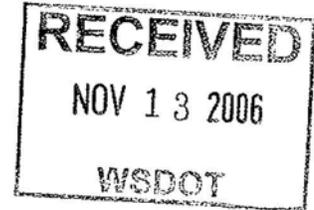




October 30, 2006

Mr. Douglas MacDonald, Secretary of Transportation
Washington State Department of Transportation
P.O. Box 47316
Olympia WA 98504-7316



Dear Mr. MacDonald,

Thank you for the opportunity to comment on the SR 520 Draft Environmental Impact Statement (DEIS). Futurewise is a statewide citizens' group that works to protect working farms and forests for this and future generations, while making cities and towns great places to live. We have members across Washington State, as well as in the Puget Sound region.

We appreciate your hard work on this issue. As you craft this package, we urge you to consider and emphasize the following priorities.

Mobility

Any alternative should aggressively maximize the use of transit, active traffic management, congestion pricing and Transportation Demand Management to move people through the 520 corridor.

- The 520 replacement should be built to accommodate future high capacity transit:
 - Pontoons should be constructed to accommodate possible future light rail connections.
 - Height/grade of the 520 facility should accommodate possible future light rail connections
 - The 520 facility should be built to accommodate possible future light rail into the proposed four or six lane footprint
- A 520 Corridor Transportation Demand Management Agreement should be developed with the adjacent 520 cities and major employers to work together to decrease SOV use in the corridor.
- WSDOT should provide supplemental information on the 4-lane alternative that includes the provision of transit and HOV lanes on local arterials, a corridor design that maximizes transit use and the effects of new regional transit and light rail investments.
 - A four-lane option with congestion-pricing should be studied.
 - WSDOT should provide supplemental information on another 4-lane option that includes a "congestion-pricing" toll that ensures free flow at rush hour for a four-lane option, to provide incentives to reduce SOV use and increase the use Transit/HOVs.

C-001-001

C-001-002

- C-001-003
- We urge studying tolling on the I-90 bridge to reduce diversion of SR 520 users to another close-by Cross-Lake facility as well as the effect of system-wide tolling on 520 Bridge throughput.

C-001-004

Select the alternative that most supports good land-use. The SR 520 Bridge replacement project is an excellent opportunity to further implement the region's growth and transportation strategy done under the state's Growth Management Act. This strategy emphasizes providing multi-modal connections between and within the region's urban centers.

The selected alternative should provide great regional and local bicycle and pedestrian connectivity.

C-001-005

Financing

The region should contribute significantly to financing the 520 project through the Regional Transportation Investment District within its current taxing authority.

Tolls should be imposed now to start generating revenue for the project.

Protection of the Natural Environment

C-001-006

Reductions in global warming emissions. Climate change is no longer the subject of debate: rather, it is our most urgent environmental and social challenge. In our region, transportation is the single greatest source of global warming emissions. Supplemental information should be provided to show how we can achieve a net reduction in global warming emissions for each alternative over a 2006 baseline.

- C-001-007
- Provide adequate mitigation for impacts on plant and animal populations.**
- There should be an inventory of plant and animal populations and mitigation should be made in light of this ecological assessment.
 - There should be a net gain in vegetation, especially trees, and no net loss in wildlife and fish based on the inventories noted above. This is an opportunity to address habitat and breeding areas, and possibly improve fish passage and other habitats.

C-001-008

Protection of Human Health

Provide appropriate mitigation for impacts on human health. Specifically, the chosen alternative should ensure:

- Noise – There should be no increase in noise levels and those noise levels should comply with King County code Chapter 12.88, Seattle and Bellevue codes or be mitigated, unless waived by the community.

- c-001-009 | • Air quality – There should be no decrease in air quality from a new bridge or from bridge construction.
- c-001-010 | • Water Quality – There should be no decrease in water quality from a new bridge or from bridge construction. Water quality includes water quantity, stormwater, spill containment and wetlands.
- c-001-011 | • Health Impact Assessment should be made for the alternative chosen. *Health impact assessment* (HIA) is commonly defined as “a combination of procedures, methods, and tools by which a policy, program, or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population.”

c-001-012 | Lid options should be studied and presented to the community for all alternatives.

c-001-013 | Protection of the Arboretum and Open Space

Any alternative should protect the Arboretum and open space. A feasible and prudent option ensures there will be:

- No net loss of publicly held parkland, open space or impairment to the plant collection and wildlife in the Arboretum.
- A limited increase of traffic traveling east/west through the Arboretum's wetlands.

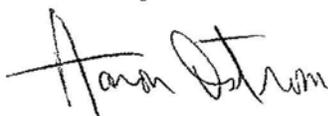
c-001-014 | Reduction of the Alternative Footprints

The footprint of each of the six-lane options should be reduced. Options should be considered that drastically limit the existing footprint including:

- Two-lane, bus and HOV-only Pacific interchange. This supports UW's neighborhood commitment to grow without increasing SOV trips.
- Reduce shoulder widths and lane widths and consider reducing design speed and vehicle speed on the bridge to ensure safety on narrower lanes as well as maximizing throughput.
- As mentioned in the above mobility section, possible future light rail should be accommodated in the proposed four-lane or six-lane footprint.

Thank you very much for considering these comments as you move forward with this project. Please feel free to contact me at (206)343-0681 if you have any questions.

Sincerely,



Aaron Ostrom

Olmsted
Friends of Seattle's Olmsted Parks
P.O. BOX 9884, SEATTLE, WASHINGTON 98109-0884
WWW.SEATTLEOLMSTED.ORG EMAIL:FRIENDS@SEATTLEOLMSTED.ORG



Board of Directors

October 31, 2006

Douglas E. Jackson
President

Duse McLean
Vice President

Charlie Sundberg
Secretary

Jerry Arbes
Treasurer

Doug Bayley

Eliza Davidson

Dottie Paris

Joan Hockaday

Brooks Kolb

Ray Larson

Brice Maryman

Sue Nicol

Susan Olmsted

Larry Sinnot

Kathleen Conner, *Ex Officio*

Mr. Paul Krueger, Environmental Manager
SR520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101

RE: SR 520 Draft Environmental Impact Statement

Dear Mr. Krueger:

As longtime advocates for preserving the Olmsted Brothers' farsighted planning and design work for Seattle and a healthy park and open space system, we are deeply concerned about the inadequacies and harmful effects of the proposals for replacing the SR 520 Bridge. Analysis in the Draft Environmental Impact Statement (DEIS) for the project is incomplete and misleading. The so-called Pacific Interchange alternative will be particularly damaging to the Washington Park Arboretum, Lake Washington Boulevard, and other nearby Olmsted-designed and planned elements of Seattle's park and boulevard system. As it stands the DEIS does not provide the basis for making an informed decision about the alternative proposals.

C-002-001

C-002-002

Board of Advisors

John Barber

Susan Black

Donald Harris

Gretchen Hull

Nancy Keith

Anne Knight

Kate Krafft

Carla Rickerson

Virginia Wilcox

Lake Washington Boulevard (Boulevard) and the Washington Park Arboretum (Arboretum) are each significant for their direct associations with the Olmsted Brothers' early and late planning and design of the Seattle park and boulevard system. The Boulevard in Washington Park was among the first design projects undertaken after the 1903 Comprehensive Plan was accepted by the city; it was built according to the Olmsteds' design. The Arboretum was designed in the mid-1930s as last of the firm's projects in Seattle. Although both the Boulevard and Park have evolved in the intervening years, when considered in their entirety they retain their essential characteristics and reflect their historic design and nature. Each should be considered eligible for National Register listing. In addition the University of Washington Campus, the design of which was in significant part planned by the Olmsteds, also appears to be eligible for National Register listing.

C-002-003

Clearly the Park and Boulevard would be most severely harmed by the "Pacific Interchange six-lane alternative. Several other elements of the Olmsted legacy in Seattle would be adversely affected as well, including the Roanoke Overlook, Interlaken Park and Boulevard, and the University's Rainier Vista.

Mr. Paul Krueger
October 31, 2006
Page 2

C-002-004 | The DEIS is deficient and misleading in several respects – the defined area of potential effect is much too narrow, several affected historic properties are either literally or effectively ignored, the analysis of adverse effect is limited and incomplete, and the 4(f) analysis does not address substantive adverse effects to historic resources.

C-002-005 | **Definition and Use of APE**

The DEIS has identified a very narrowly drawn Area of Potential Effect (APE) and has seriously assessed an even smaller area, thereby avoiding consideration of significant adverse effects to historic resources. The APE nominally includes the Arboretum and portions of the Boulevard, but in practice is limited to what is called the “project area.” Page 69 of Appendix D even states that the Arboretum Aqueduct “is not within the project APE” even though the Aqueduct spans the Boulevard within the Arboretum. While this may be an inadvertent error, it indicates the extent of consideration that the Arboretum and Boulevard are given in the DEIS. Although the University of Washington Campus (UW Campus) will also be adversely affected by traffic and visual intrusion, it is excluded from the APE. The APE and analysis of adverse effects should be expanded to encompass the UW campus and should seriously consider effects to the entire Arboretum and Boulevard.

C-002-006 | **Identification of Historic Properties**

The DEIS frequently states that the Arboretum has not been formally evaluated for listing in the National Register of Historic Places. The Boulevard, Seattle’s signature park boulevard, is neither identified nor discussed as an historic resource. As parts of the Olmsted-planned park and boulevard system, both were found eligible for listing in late 1998, in response to an inquiry from Sound Transit (see enclosed November 2, 1998 letter to Sound Transit from the Office of Archaeology and Historic Preservation).

As the DEIS notes, Lake Washington Park, and later the Arboretum, included all of Foster Island and the lagoon areas to the south. Subsequent historic WPA-era plantings were also made in the northern section of the Arboretum. As a result, all of these areas constitute a larger historic cultural landscape that must be considered in the Section 106 process, regardless of current ownership. The DEIS does not do this, nor does it properly consider the integrity of the entire resource, focusing instead only on the portion within the narrowly drawn “project area.”

The UW Campus, a designed historic landscape dating from the late 1890s and including elements of the Alaska-Yukon Pacific Exposition of 1909, will be adversely affected by traffic and visual intrusion. The UW Campus has not been considered as an historic property.

Assessment of Adverse Effects

As noted above, the DEIS does not seriously consider adverse effects to several historic properties – the entire Arboretum, the Boulevard, and the UW campus. These potential effects are numerous and significant.

Mr. Paul Krueger

October 31, 2006

Page 3

C-002-007

Traffic analysis in the DEIS underestimates volumes on Lake Washington Boulevard, particularly the “Pacific Interchange” alternative, which would create a new north-south route from the University to Madison Street via the Boulevard, carrying traffic which now uses 23rd Avenue. It is difficult to imagine that traffic loads would not be significantly affected by the proposed alternatives, since all SR 520 traffic and traffic to and from the south would be carried by the Boulevard rather than being shared with 23rd Avenue. In addition to bridge traffic, north-south traffic unrelated to SR520 would also be carried over the interchange bridge. Idle time due to bottlenecks at Madison Street would increase the adverse effects of traffic to the Arboretum.

C-002-008

Heavy traffic, noise, glare and water and air pollution along the Boulevard are already significant impediments to the ongoing functions and health of the Arboretum’s collections and its educational and recreational activities. Recreational and student users have difficulty crossing the Boulevard at many times of day and the Arboretum’s plant collections are being damaged by air pollution, and, occasionally, collisions. Increasingly degraded runoff would continue to drain directly into the Duck Bay wetlands from Arboretum Creek. Increased traffic would increase all of these adverse effects. The Boulevard is a designated park boulevard. It is completely inappropriate for use as a traffic arterial or collector. Even its current traffic volume conflicts with the Boulevard’s scenic and historic character, adjacent historic and park resources, and its small scale and capacity.

C-002-009

Visual simulations in the DEIS misrepresent the scale, appearance and intrusive visual impacts of the project, particularly the “Pacific Interchange” alternative. The viewshed defined for analysis (Visual Quality and Aesthetics, p. 13 and Exhibit 5) seriously underestimates what will be viewed from the southern UW campus and from the northern end of the Arboretum and the Boulevard, especially during the many years that are required for removed vegetation to return to mature sizes. The viewpoints chosen for simulations are either at a great distance or very close to the roadway, leaving out views in which intrusion will be most apparent – from the UW Boathouse and the northern portion of the Boulevard, among others. The Visual Quality Addendum contains no simulations, even though the “Pacific Interchange” alternative requires the broadest and highest bridges and is thus the most intrusive. Furthermore, the Addendum states that the Second Montlake Bridge alternative would have greater adverse visual effects than the “Pacific Interchange” alternative. This comparison grossly overemphasizes proximity to the Montlake Bridge while underemphasizing the much wider intrusive effects of the “Pacific Interchange” alternative. The Addendum’s analysis provides neither illustrations nor substantive justification. (Appendix S, pages 1 and 16)

C-002-010

Cumulative effects are not properly considered. As noted earlier, heavy traffic and air pollution already pose major threats to the ongoing functions and health of the Arboretum’s collections and its educational and recreational functions. Even small increases would have disproportionate cumulative impacts to these aspects of the historic properties affected.

C-002-011

In sum, the DEIS should be revised to accurately consider the full range of affected historic resources and the extent and nature of all significant adverse effects.

Mr. Paul Krueger
October 31, 2006
Page 4

Section 4(f) Analysis

The 4(f) analysis in the DEIS neglects to analyze adverse effects to ignored and minimally considered historic resources.

Some of the proposed alternatives significantly underestimate their effective land 'take' because they require relocation to the Arboretum of uses that would otherwise occupy the Museum of History and Industry facilities, as proposed on page 51 of the Addendum to Appendix P. In addition, the Boulevard, which is owned by Seattle Parks and Recreation, is a park boulevard and thus must be considered as park land. Increased traffic loads which affect its ability to function as a park boulevard constitute constructive use for road purposes. Neither of these constructive uses of historic properties is considered in the 4(f) analysis. The Addendum to Appendix P repeatedly states that the adverse effects of the 6 lane alternatives, including the "Pacific Interchange" alternative, are the same, despite the addition of north-south traffic over the interchange bridge.

Although the DEIS and 4(f) analysis claim that there is no net loss of park land if the current ramps are removed, restored and returned to park use, it neglects to note that the environmental functions of the restored areas will not offer comparable natural functions or habitat for many years, nor will the increase in covered water area be mitigated by such restoration. Although natural functions are not "historic" in the usual sense, Washington Park and the Arboretum were designed to provide a rich range of opportunities for enjoyment and study of the natural world. The loss of such richness is thus detrimental to the historic character, design, feeling and intended use of the historic properties.

Given the incompleteness of the 4(f) analysis, a de minimis finding, as suggested on page 45 of the Addendum, seems entirely inappropriate.

FSOP and other groups have requested that alternatives without ramps from the Arboretum be analyzed, but the DEIS dismisses this possibility without substantive discussion. Closure of the Arboretum ramps would remedy the majority of adverse effects to the Arboretum and Boulevard but has been rejected out of hand in the DEIS for political rather than substantive reasons -- because it would not be accepted by some in the Montlake neighborhood. Elimination of the Arboretum ramps, a simple and feasible measure that would reduce costs and eliminate the most damaging impacts to the city's park and boulevard system, should be included in all alternatives. A broader set of alternatives would also be welcome, since those addressed in the DEIS all have serious shortcomings.

The Friends of Seattle's Olmsted Parks (FSOP) requests that a thorough Section 106 review be conducted to assess the effects of the SR 520 Project on Washington Park and Arboretum, Lake Washington Boulevard and the University of Washington Campus, each of which is adversely affected by all proposed SR 520 alternatives. We also request that FSOP be included as a

Mr. Paul Krueger
October 31, 2006
Page 5

C-002-015

consulting party in the Section 106 process and any related Memorandum of Agreement or Programmatic Agreement, in accordance with the provisions of 36CFR Part 800.2(c)(5), which call for the participation of organizations with a demonstrated interest in an undertaking's effects on historic properties.

Thank you for your attention to the significant omissions, factual errors and misjudgments in the draft DEIS as noted above. We look forward to a corrected and comprehensive revision of the draft.

On behalf of the Board of Directors,

A handwritten signature in black ink, appearing to read 'D. E. Jackson', with a long horizontal line extending to the right.

Douglas E. Jackson
President

Enclosure: November 2, 1998 letter from Greg Griffith, Washington State Office of Archaeology and Historic Preservation, to James Irish, Sound Transit

cc: Governor Christine Gregoire, State of Washington
Mayor Greg Nickels, City of Seattle
James Leonard, Federal Highway Administration
Allyson Brooks, Washington State Historic Preservation Officer
Karen Gordon, Seattle Historic Preservation Officer
Seattle Landmarks Preservation Board



STATE OF WASHINGTON

DEPARTMENT OF COMMUNITY, TRADE AND ECONOMIC DEVELOPMENT
Office of Archaeology and Historic Preservation420 Golf Club Road SE, Suite 201, Lacey • PO Box 48343 • Olympia, Washington 98504-8343 • (360) 407-0752
Fax Number (360) 407-6217

November 2, 1998

Mr. James Irish
Sound Transit
1100 Second Avenue, Suite 500
Seattle, Washington 98101-3423

In future correspondence please refer to:

Log: 050598-09-FTA

Re: Central Link Light Rail Transit
Project Determinations of Eligibility

Dear Mr. Irish:

On behalf of the Washington State Office of Archaeology and Historic Preservation (OAHP) I have completed my review of the historic properties identified as within the area potentially affected by the Central Link Light Rail Transit Project. By my count, this review includes 78 Historic Property Inventory Forms which in turn has included several historic districts and one multiple property resource, the Olmsted Park system. These properties represent a diverse range of property types and a substantial collection of some of the region's most historically significant and architecturally distinguished structures.

As a result of this review, I concur that all the properties submitted to OAHP to date are eligible for listing in the National Register of Historic Places. This concurrence includes the Olmsted Park System; the Roanoke Park, Federal Avenue, and Fraternity/Sorority Row historic district; and the Columbia City Historic District expansion. I note that the Seattle-First National Bank Building at 566 Denny Way (B85) is less than 50 years of age. At this point, it does not meet the test for exceptional significance for properties which have yet to reach the 50 year age threshold for National Register consideration. However, it is my opinion that the building will be eligible by the year 2000 when it will reach the 50 year age threshold. Therefore, it would be prudent for Sound Transit to incorporate this property into its project planning process.



Laurelhurst Community Club

Serving 2800 Households and Businesses in Seattle's Laurelhurst Neighborhood

Laurelhurst Community Club SR520 Position Statement

September 11, 2006

C-003-001 | The Laurelhurst neighborhood supports the city's goal of reducing driving by promoting pedestrian, bicycle and mass-transit alternatives. We also support the city's goal of being a leader in environmental stewardship and economic viability.

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

C-003-002 | Inter-modal Connectivity

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

C-003-003 | Local Traffic Impacts

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

C-003-004 | Noise

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

C-003-005 | Washington Park Arboretum

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

C-003-006

Project Scale

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

C-003-007

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

C-003-008

Conclusion

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

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

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



Jean Amick, LCC Transportation Committee
3008 East Laurelhurst Drive NE
Seattle, Washington 98105
206-525-7065 jeanseattle@earthlink.net



Joseph Herrin AIA, LCC Transportation Committee
5040 47th Avenue NE
Seattle, Washington 98105
206-525 6541 jherrin@heliotrope.cc

CITIZENS FOR A SANER SOLUTION
SANERSOLUTION@GMAIL.COM

September 18, 2006

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

From: Citizens for a Saner Solution
sanersolution@gmail.com

Re: Proposed SR 520

Upon reviewing the draft Environmental Impact Statement for the new SR 520 project, the full impact of the current proposals have become devastatingly apparent. An emerging group of individuals and organizations have questioned "Isn't there a better way of increasing mobility of people while protecting and enhancing our natural and community resources?"

By combining some of the elements of each of the current proposals, there is way of giving priority to transit mobility while simplifying the project, reducing the impact on the wetlands and restoring Washington Park Arboretum

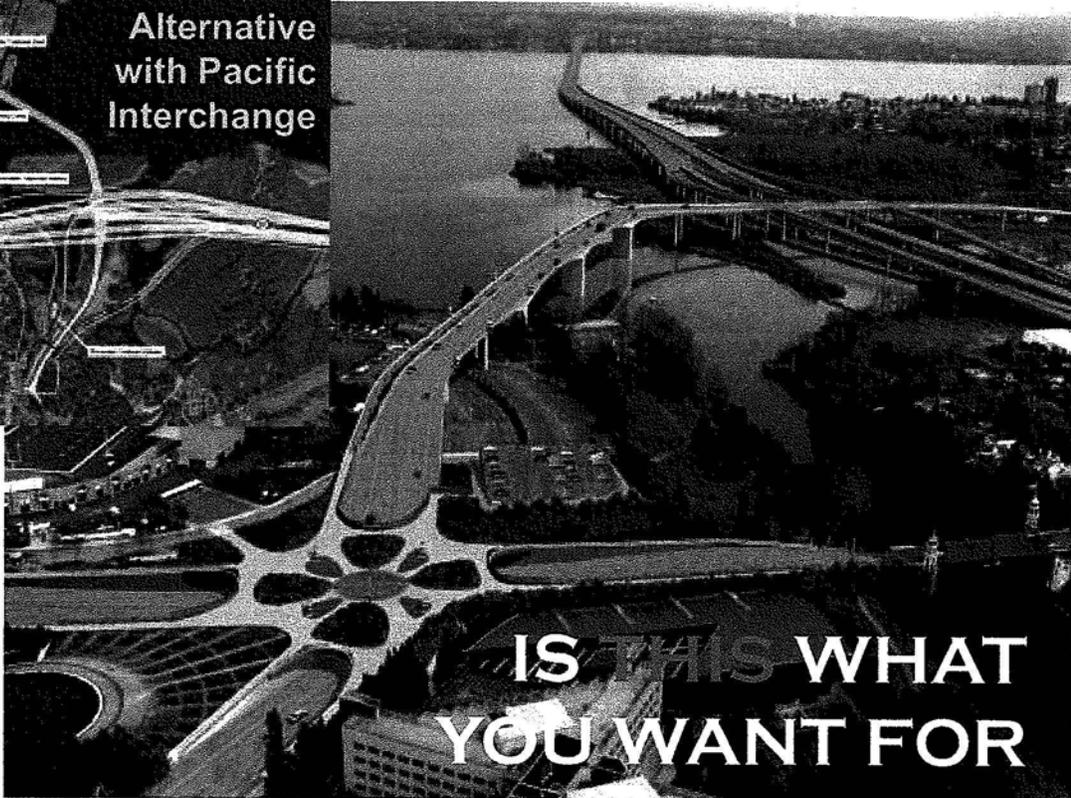
The attached documents outline the elements of a new proposal – a saner solution.

Please give this idea full consideration.

C-004-001



SR520
WSDOT
6-Lane
Alternative
with Pacific
Interchange



WSDOT
Draft Rendering:
6-Lane Alternative
for SR520
Pacific Street
Intersection
May 2006

IS THIS WHAT
YOU WANT FOR

SEATTLE ???

THERE ARE SOME SERIOUS PROBLEMS
WITH THE CURRENT ALTERNATIVES FOR
SR520, BUT...

BY COMBINING some of the best ideas from each of the current alternatives for the Montlake/Lake Washington Boulevard section of SR520 and adding some new ideas, there is an opportunity to solve this dilemma in a manner that enhances the sustainability and quality of life in our city.

Please be creative in giving priority to transportation solutions that work for our city's future, by moving people efficiently and effectively, while at the same time protecting its treasures.

THANK YOU

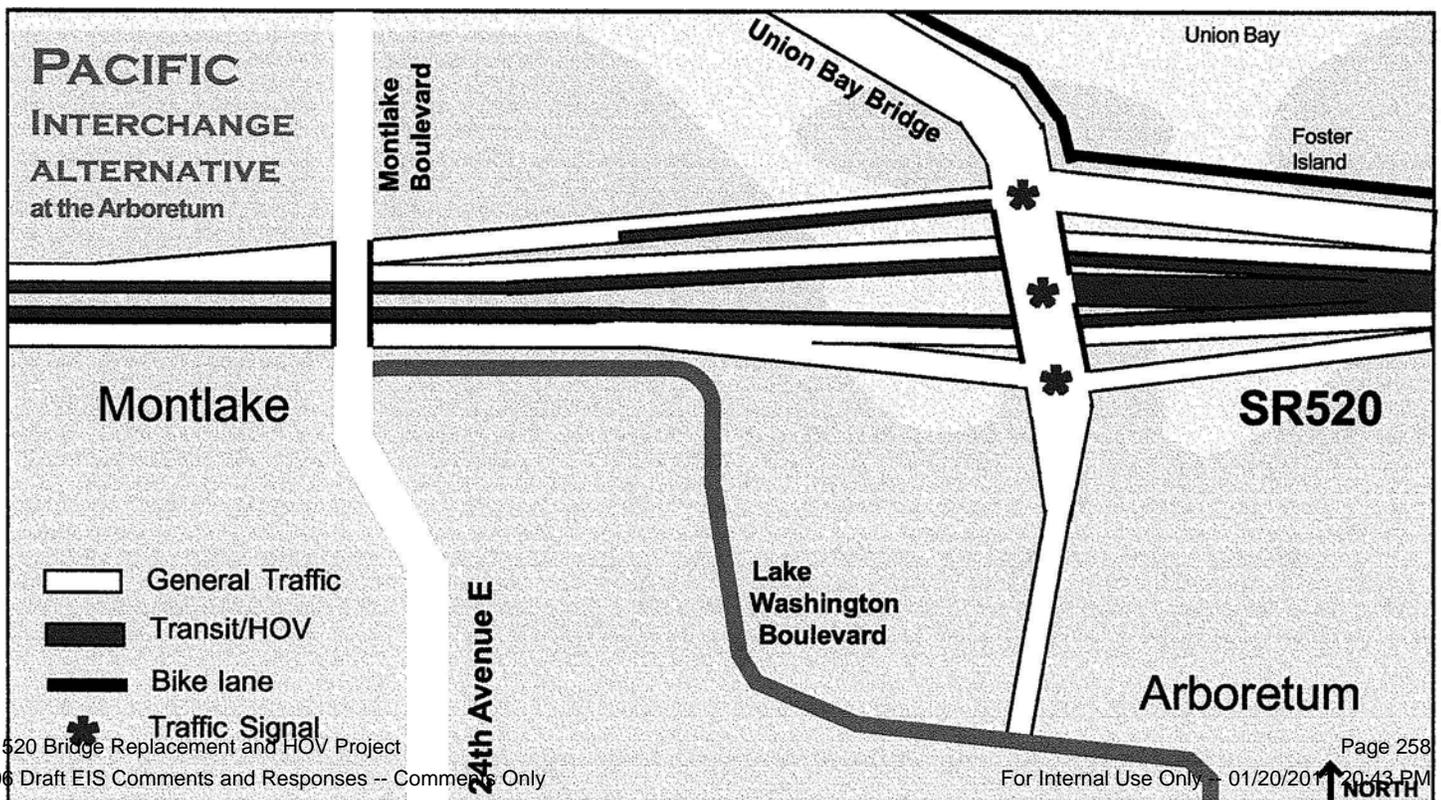
SEATTLE CAN DO BETTER AT SOLVING ITS TRANSPORTATION CHALLENGES!

FOR SR520 WE CAN DO A BETTER JOB AT:

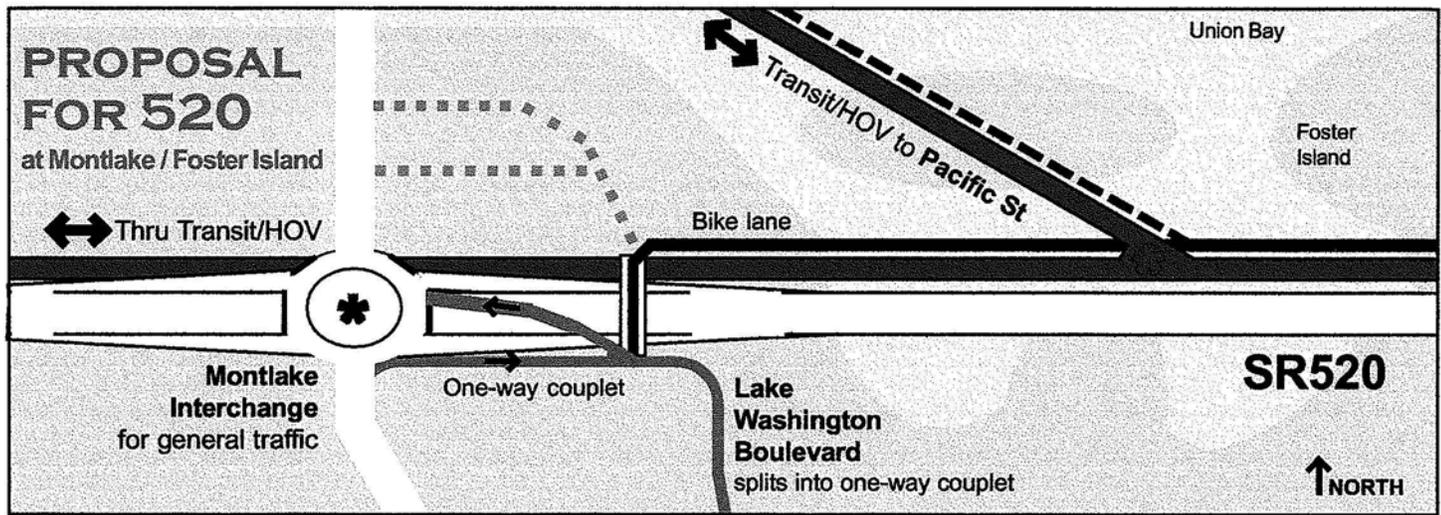
- protecting our natural systems, parks & historic resources, while
- moving more people efficiently & effectively,
- providing better options for high capacity transit connections, and
- facilitating phasing and reducing the costs of construction.

FOR EXAMPLE HERE ARE SOME OF THE PROBLEMS WITH THE CURRENT PACIFIC INTERCHANGE ALTERNATIVE:

- Pacific Interchange alternative has no dedicated transit/HOV lanes on Union Bay Bridge.
- Transit/HOV entering westbound to SR520 must merge across two lanes of traffic to reach the center HOV lane.
- SR520 eastbound exit ramp has no transit/HOV lanes.
- Seven lanes of general traffic exit SR520 at the Pacific Interchange, of which three lanes plus one HOV lane turn south to exit to historic Lake Washington Boulevard and the Arboretum rather than to a major arterial.
- The only bicycle access to SR520 is at Pacific Street on a bike lane of more than 7% grade.
- Right angle turn from bridge to SR520 does not facilitate future regional light rail from UW.
- SR520 at Pacific Interchange has (with ramps) **16** lanes fanned out across the wetlands whereas the proposal shown on the next page cuts that number in half).



HERE'S A SANER SOLUTION TO CONSIDER



06091801

GOALS:

- Reduce the width and height of SR520 between Foster Island and Montlake and the need for flyovers and weaves.
- Provide direct transit/HOV access to the Pacific intersection at the University while reducing the footprint and impact.
- Provide long-term opportunity for the future regional light rail connection using Union Bay Bridge to access SR520.
- Have SR520 vehicular traffic use major arterials for access; not the boulevard through Washington Park Arboretum.
- Provide bicycle access to/from boulevard rather than major arterial, and separate bicycles from SR520 exiting traffic for both north- and south-bound travel as well as provide possible direct connection to Pacific intersection.

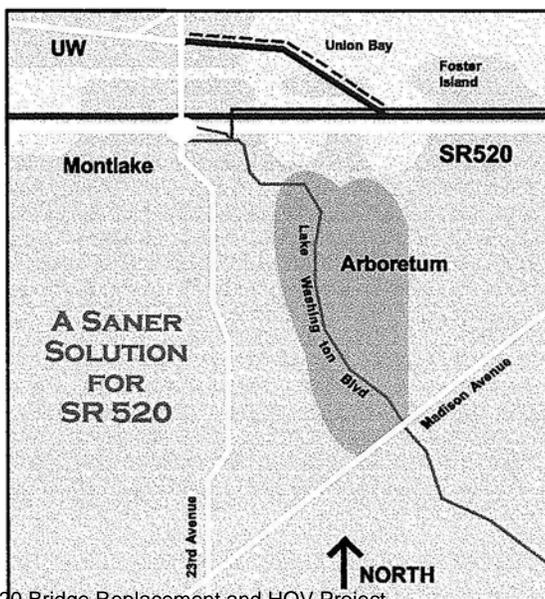
LEGEND for Saner Solution

- 4-lane General Traffic with shoulder breakdown lanes as needed
- 2-lane Transit/HOV with center bypass lane
- Bike lane (— — optional)
- Existing bike route
- Roundabout or signalized intersection
- Traffic Signal
- Lake Washington Boulevard

NOTE: Lid locations to be determined

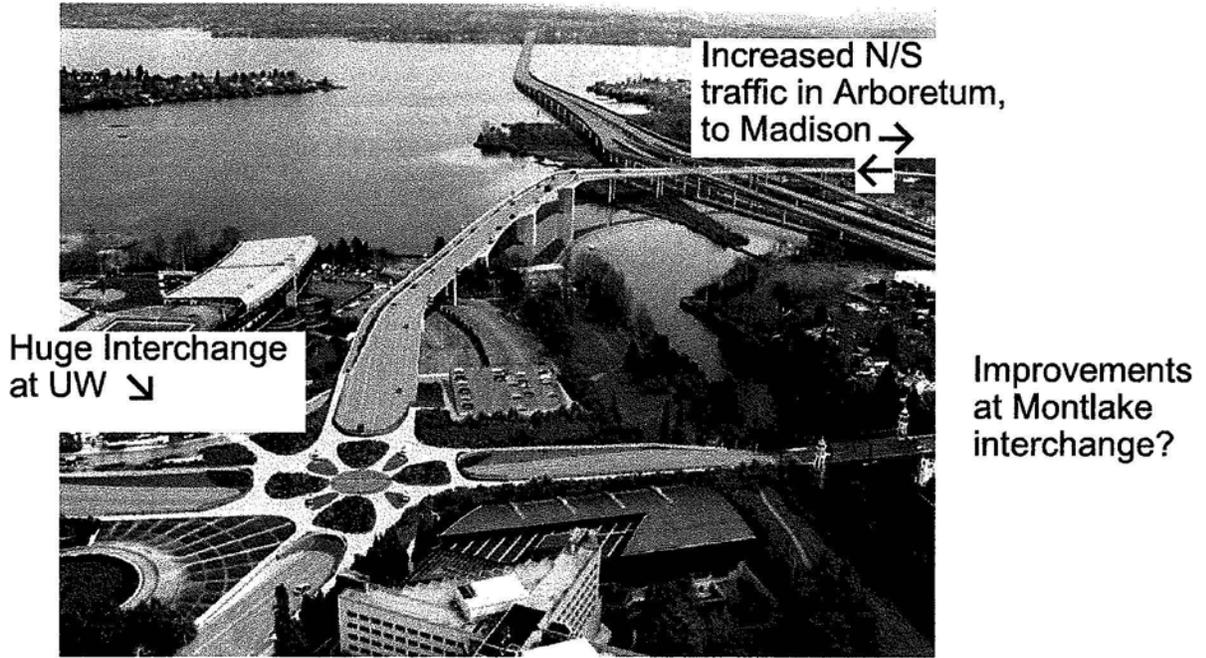
DESCRIPTION:

- **Transit/ HOV** is separated from general traffic with dedicated connection directly to Pacific Street (could be built as 1st phase).
- **General traffic** enters/exits SR520 at Montlake Interchange.
- **Lake Washington Boulevard** returns to its park boulevard status. It is split to form a one-way couplet as it approaches the Montlake interchange, thus improving the function of the Montlake Interchange.
- **Bicycles** connect directly to Lake Washington Boulevard with option to Pacific Street.

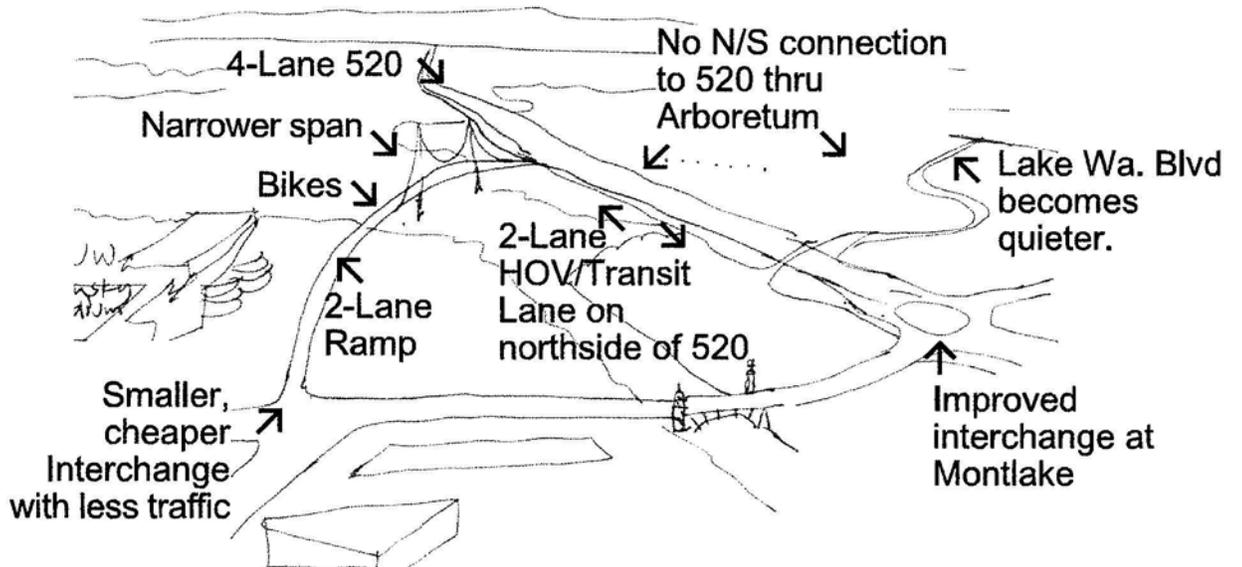


SR 520 Bridge Replacement and HOV Project

HELP ADVOCATE for a saner solution to SR520



WSDOT 6-Lane Alternative with Pacific Street Intersection



SanerSolution@gmail.com



**J. RICHARD ARAMBURU
JEFFREY M. EUSTIS**
Attorneys at Law
505 Madison Street, Suite 209
Seattle, Washington 98104
(206) 625-9515 Fax: (206) 682-1376

September 22, 2006

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

Re: DEIS for SR 520 Bridge Replacement
Pedestrian/Bicycle Connection Options

Dear Mr. Krueger:

We represent SWAMP – Save the Wetlands of the Arboretum from Multitudes of People. SWAMP is an organization of residents within the Madison Park and Montlake Communities dedicated to protecting the Arboretum and its wetlands from further desecration.

SWAMP has been long involved in working for transportation solutions that protect and preserve the Arboretum and its wetlands. During the course of a prior proposal, SWAMP convincingly demonstrated there to be preferable alternatives to a bike and pedestrian trail which was then proposed to pass through Arboretum wetlands lying between Foster Island and the Broadmoor Golf Course.

We have reviewed the Draft Environmental Impact Statement for the SR 520 Bridge Replacement. Although the DEIS does not include within either its proposed action or its alternatives an additional pedestrian/bicycle connection at Madison Park, there does exist a separate Technical Memorandum, the Madison Park Bicycle/Pedestrian Path Option (May 2, 2006) that addresses two additional options, a connection at 37th Avenue East, which would run through wetlands of the Arboretum, and a connection at 43rd Avenue East, which would connection with existing City streets.

SWAMP understands there to be interest by some within the City of Seattle to include as a modification to the 520 Bridge Replacement Project a bicycle/pedestrian connection at either of these locations.

SWAMP urges the WSDOT to reject the inclusion of such an alternative on grounds that it is unnecessary, it would be more destructive than the other available

September 22, 2006
Page 2

C-005-001

alternatives, its consideration would conflict with the City's Critical Areas Ordinance, the National and State Environmental Policy Acts, the federal Clean Water Act and the federal Department of Transportation Act, and its cost is not justifiable.

An additional connection at 37th Avenue East is unnecessary.

Within the corridor that includes Madison Park, the Arboretum and Montlake, plans for the expansion of 520 already include a number of bicycle and pedestrian connections. The DEIS at Figure 3-9 identifies five connections within the section between Montlake Boulevard and the Arboretum:

a connection to an underpass at Foster Island that serves an existing trail system;

an underpass connecting existing trails east of the Museum of History and Industry (MOHI) to those existing trails within the arboretum south of 520;

a connection to an existing bike trail on an existing overpass west of MOHI;

An overpass connection at Montlake Boulevard; and

a connection to an existing trail passing under 520 and linking the Montlake playfield with Montlake Boulevard.

The abundance of access points belies any need to consider yet additional alternatives for access. By contrast, at its westerly end the bicycle path on I-90 has one entry point, which connects to one route that passes above the bridge.

An additional connection at 37th Avenue East would unnecessarily exacerbate environmental impacts of the bridge.

An additional access point would involve far greater impacts than any of the other five access points identified above. It would cut a new swath through Arboretum marshlands, thereby displacing important breeding, nesting and rearing habitat for waterfowl. It would cross and obstruct a channel actively used for canoeing, kayaking and wildlife observation. And it would largely displace a public access point to the water. The construction of a separate bridge would involve far greater costs than any of the other access alternatives, since it would require construction of a new over-water span. And yet, despite its additional cost the proposed connection would not link to any existing bicycle route, unlike each of the five other connections. A connection at 37th Avenue East would create unnecessary and unacceptable impacts, which themselves would require additional mitigation.

A connection at 37th Avenue East would conflict with the City's Critical Areas Ordinance.

The contemplated connection would also conflict with the recently adopted amendments to the ECA ordinance. While the new amendments expand the exemptions to allow for the intrusion of trails into environmentally critical areas, that exemption still only applies where “[n]o practicable alternative to the work with less impact on the environmentally critical area or buffer exists . . .” SMC 25.09.045H.1.b Practicable alternatives to a connection at 37th Avenue East clearly do exist, at least five. Pursuit of an alternative that would violate recently adopted standards would undercut protections that the City just adopted. The conflict with existing land use codes and other environmental regulations must be identified and analyzed as a significant impact of a proposed connection at 37th Avenue East. WAC 197-11-330(3)(e)(iii) and -444(2)(b)(i).

A connection at 37th Avenue East would violate NEPA and SEPA.

The consideration of alternatives within an EIS must be devoted to those alternatives that could attain the proposal's objectives but at a lower environmental cost. See WAC 197-11-440(5)(b) (requiring the consideration of less harmful alternatives under SEPA) and *Roosevelt Campello International Park Commission v. EPA*, 684 F.2d 1041 (1st Cir. 1982)(in which the court ruled that it was proper under NEPA to exclude consideration of an alternative whose impacts were worse than those of the proposed project). After all, where it is the function of both NEPA and SEPA to “prevent and eliminate damage to the environment”, no purpose is served by pursuing an alternative that would be even more destructive to the environment than the actions already proposed. See 42 USC §4321 (NEPA) and RCW 43.21C.020 (SEPA). A modification to the project that would exacerbate its environmental impacts would contradict the purposes of NEPA and SEPA.

A connection at 37th Avenue East would violate the Clean Water Act.

The contemplated connection would conflict with Section 404 of the Clean Water Act. Regulations adopted by the EPA under 42 USC §404(b)(1) prohibit the discharge of fill material into waters of the United States unless there exist no “practicable alternatives” with less adverse impact on the aquatic ecosystem. Where the basic purpose of the proposed project does not require siting at the aquatic site, practicable alternatives are presumed to exist. 40 CFR §230.10(a)(3). The proposed connection to 37th Avenue East falls within this prohibition: it would involve the placement of fill (concrete pilings) within a US water (Lake Washington); its purpose would be to provide a connection to City streets and not to promote some aquatic use or purpose; and other, non-aquatic connections already exist, such as connections at Foster Island, the MOHI and Montlake Boulevard as listed above.

September 22, 2006
Page 4

C-005-001

A connection at 37th Avenue East would violate the Federal Department of Transportation Act.

Section 4f of the Federal Department of Transportation Act of 1966, 49 USC § 303, prohibits the Federal Highway Administration, a source of funding for the 520 Bridge Replacement project, from approving a project that would use significant public park, recreation areas, wildlife or waterfowl refuge, or an historic site unless there exist no feasible and prudent alternative to the use of such land and the project includes all possible planning to minimize harm to such an area. Conversely, if a feasible and prudent alternative does exist, it must be selected.

Under section 4f, the 37th Avenue East street end is a Seattle Parks and Recreation resource. It provides public access to the water, it is used for recreation and the area provides wildlife and waterfowl refuge. A pedestrian/bicycle connection would displace this public resource with a concrete, elevated bridge that would be at least 14 feet wide and rise up 10-14 feet from the shoreline.

The full impact of the proposed connection upon the public access has not been disclosed within the Technical Memorandum. Neither words, dotted blue lines (Ex. 3) nor solid blue lines (Ex. 13) adequately portray the impact that a 14 foot wide structure rising 10-14 feet above the shoreline would have at this public access. If the connection is proposed as part of the project, a full, graphic rendering of the connection should be provided.

Any commitment to mitigate for these displaced resources would not avoid the section 4f limitations. Before alternative planning is even considered, there must be some demonstration that there exist no feasible and prudent alternatives. But in the case of the 37th Avenue East connection, feasible and prudent alternatives clearly do exist, the five present connections. Section 4f flat out precludes an additional connection at 37th Avenue East.

Marginal benefits of the connection do not warrant its additional cost.

The Technical Memorandum does not disclose the cost of a connection at 37th Avenue East. SWAMP has heard estimates of \$25 million for an additional Madison Park Connection. The Technical Memorandum should be revised to disclose the estimated cost of this facility. At an estimated \$25 million, a proposed pedestrian/bicycle bridge that would connect to no existing pedestrian/bicycle trail would provide little, if any, marginal benefit.

For each of the above reasons, we ask the WSDOT to affirmatively reject the notion that an additional connection at Madison Park, and particularly one at 37th Avenue East, be considered among the pedestrian and bicycle access alternatives within the EIS for the 520 bridge replacement. Such a proposal would only exacerbate the adverse effects (and costs) of a project that will already have tremendous impacts on the

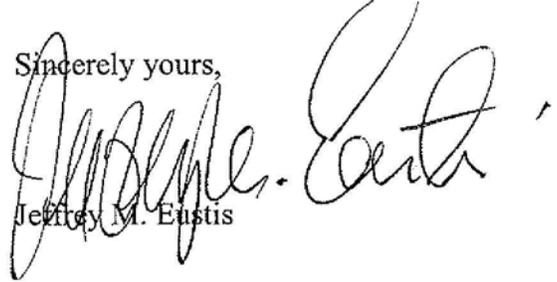
September 22, 2006
Page 5

C-005-001 |

Arboretum, its wetlands and waterways.

Thank you for your consideration of these comments. SWAMP requests to be listed as a party of record. Further correspondence may be directed to this office.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Jeffrey M. Eustis". The signature is fluid and cursive, with a large initial "J" and "E".

Jeffrey M. Eustis

JME/py

cc:
James Leonard
Megan White
Perry Weinberg
SWAMP

University Village Merchants Association

September 22, 2006

Paul Krueger
WSDOT Environmental Manager
SR520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101

Dear Mr. Krueger,

C-006-001

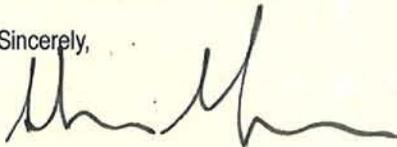
This letter is submitted on behalf of the University Village Merchants Association which represents the over 100 merchants doing business at University Village, a significant shopping resource for consumers throughout the Pacific Northwest and particularly in Seattle. The merchants in our Association employ workers who commute to University Village from throughout the region.

We would like to express our support for a solution to the Montlake Blvd. bottleneck and our impression is that the Pacific Street Interchange Plan is the alternative that significantly improves the traffic bottleneck occurring at the current SR520 interchange in the Montlake neighborhood. This bottleneck results in significant traffic back-ups for cars heading south on Montlake Boulevard. This back-up often leads all the way to University Village, delaying our customers and employees in twenty-to-thirty minute traffic line-ups should they desire to access SR520 or local neighborhoods south of that interchange (Montlake, Capitol Hill, Madison Park, Washington Park, Broadmoor, Mount Baker, etc.).

In addition, we welcome the opportunity to restore transit service to northeast Seattle, a critical consideration for our employees seeking alternative forms of transportation. As retail and restaurant owners, we heavily subsidize bus passes for our employees but the increasingly unpredictable traffic situation resulting from the Montlake bottleneck has led to a decline of bus service to University Village and adjacent neighborhoods, placing additional burdens on employees and customers with increased single occupancy vehicles. The fact that the Pacific Street Interchange Plan provides a direct link between buses and the Sound Transit light rail station at the University of Washington is another transit improvement that will significantly help our employees and customers. We support Metro's commitment to providing additional bus service to and from the proposed transfer station and University Village. It is the only SR520 plan that supports direct bimodal transit connectivity for our part of the city.

In short, we believe that the Pacific Street Interchange Plan offers the greatest opportunities for traffic and transit mobility throughout the region that University Village serves, and accomplishes this in a way that minimizes adverse environmental and residential impacts. Indeed, it appears that with this alternative there are several opportunities to enhance parks, pedestrian and bike trails, and green space in and around the neighborhoods adjacent to SR520, through the mitigation planning process.

Sincerely,



Shawn Garner of Zao Noodle Bar

Representing the University Village Merchants Association Board of Directors:

- | | |
|--|---|
| <i>Toni Forseth, Louie Permelia</i> | <i>Jim Mar, Bartell Drugs</i> |
| <i>Mindy Bogdan, Kiehl's Since 1851</i> | <i>Karla Easton, Kid's Club and Sole Food</i> |
| <i>Mary Anne Stusser, Paint the Town</i> | <i>Keith Hudson, The Ram</i> |
| <i>Tony Elliott, Barnes & Noble</i> | |

- Kristi Holmes, The Confectionery*
- Carol Bromel, Mrs. Cook's*
- Susie Plummer, University Village*

cc Governor Christine Gregoire
Mayor Greg Nickels
Seattle City Councilmember Richard Conlin
Seattle Chamber of Commerce

From: earljbelle@netscape.net [mailto:earljbelle@netscape.net]

Sent: Wednesday, October 04, 2006 12:17 PM

To: SR 520 DEIS Comments

Cc: richard.conlin@seattle.gov; Jan.Drago@seattle.gov; Jean.Godden@seattle.gov;
Nick.Licata@seattle.gov; Richard.McIver@seattle.gov; Tom.Rasmussen@seattle.gov;
Peter.Steinbrueck@seattle.gov; David.Della@seattle.gov; sally.clark@seattle.gov

Subject: SR 520 Comments of DEIS

Please find attached the comments of the University Park Community Club on the August 18, 2006 DEIS. Remarks, questions and clarifications should be addressed to me as the authorized person for this matter.

Earl J. Bell
Board Member

[Check Out the new free AIM\(R\) Mail](#) -- 2 GB of storage and industry-leading spam and email virus protection.

UNIVERSITY PARK COMMUNITY CLUB

OCTOBER 10, 2006

Paul Krueger
Environmental Manager
SR 520 Bridge Replacement Project

Comments sent to sr520deiscomments@wsdot.wa.gov

c-007-001 These are Comments submitted by the University Park Community Club (UPCC) pursuant to the call for public comment on this project contained in the DEIS dated August 18, 2006. We join those individuals and organizations who have stated their concerns or their opposition to the Pacific Street Interchange Option (PSIO). As the manner in which all of the alternatives and options are presented serves to make it appear that this option under the six-lane alternative is the WSDOT "putative preferred alternative" (PPA) most of our comments will be addressed to it specifically.

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

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

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

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

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

c-007-001 | bulk of the projected demand to this transport modality. This has not seriously been considered in the DEIS. There is not even a clear plan of how passengers transfer between different bus lines. There must be a valid concept of how a new light rail line would continue on either side of the bridge and connect to other lines and buses. For instance, the intersection near Marsh Island should be designed to accommodate the wider curves needed for light rail to make the turn towards Husky Stadium. Once light rail gets to the Pacific Street intersection is it going to go over all the planned new construction or below? Can the mezzanine floor of the presently planned station be modified for an underground east-west station for a line to Ballard, or is the 520 line going to make a turn and connect to the downtown line? We should not box ourselves in and prevent solutions needed in the future.

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

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

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

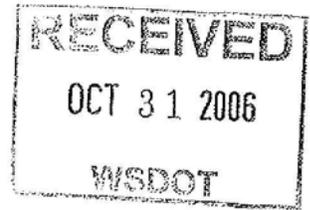
c-007-002 | Thus, with the recent adjustments due to inflationary pressure and the Seattle City Council's apparent preference for the most expensive option, the process is dangerously close to assurance that the PPA will not be fully funded. This being the case, the UPCC urges the adoption of the 6-lane alternative with a second Montlake bridge as the most prudent way to proceed given the current fiscal situation of the State. The six-lane alternative is acceptable as an alternative only if the "HOV lanes" are dedicated not for HOV use but for transit use exclusively. To do otherwise would be to court a lack of full funding and thus to delay the immediate undertaking of bridge replacement.

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

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

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

Earl J. Bell
Board Member



LESCHI COMMUNITY COUNCIL
P.O. BOX 22391 ♦ SEATTLE, WA 98122-0391

Maintaining the Ethnic and Economic Diversity of the Leschi Community

October 5, 2006

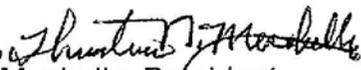
TO: Paul Krueger, WSDOT Environmental Manager
FROM: Leschi Community Council
RE: 520 options and Need for Increased Police

The Leschi Community Council made two motions in last night's meeting addressing the 520 plan and requesting more police in view of increased gang activity in the Central district. The motions were accepted unanimously and read as follows:

c-008-001

The Leschi Community Council expresses its opposition to the 6-lane Pacific Interchange Alternative for the replacement of 520 because of the environmental impacts (especially on the Arboretum) and the costs. We urge submission of an alternative without Arboretum ramps. We feel so strongly about the proposal that we are withholding our support of the Transportation Levy until Seattle provides environmentally and fiscally sound solutions for transportation projects.

The Leschi Community Council is aware of a marked increase in crime, especially gang related crime, and we strongly support increased funding for increasing the number of police.

Sincerely, 
Thurston Muskelly, President
Leschi Community Council

c: City Council Members
Mayor Greg Nickels
Governor Christine Gregoire

MONTLAKE COMMUNITY CLUB

"Working together to maintain and nurture the natural environment and history of the Montlake neighborhood"

October 14, 2006

VIA E-MAIL AND U.S. MAIL

John Milton, Project Director
Washington State Department of Transportation
SR 520 Bridge Replacement and HOV Project
414 Olive Way, Suite 400
Seattle, Washington 98101-1209

Re: Montlake Community Club Comment – SR 520 Draft Environmental Impact Statement

Dear Mr. Milton:

I am writing on behalf of the Montlake Community Club regarding the SR 520 Draft Environmental Impact Statement. Representing over 1300 household and business members, the Montlake Community Club strongly supports the adoption of the Pacific Interchange / BetterBridge alternative as the preferred alternative for the replacement of SR 520.

c-009-001 On September 14, 2005, the Montlake Community Club unanimously passed a resolution enthusiastically supporting the Pacific Interchange option for SR 520 and vigorously opposing the other 6 lane alternatives.

Since passage of that resolution, SR 520 has been discussed at every Board and general meeting Montlake Community Club has held, as well as in the Montlake Flyer, the monthly publication of the Montlake Community Club. Support for Pacific Interchange in these open forums has been unwavering and strong. Additionally, I have had at least 100 private discussions with residents of Montlake about the replacement of SR 520, in which support for Pacific Interchange has been equally strong.

The case for the Pacific Interchange is compelling from both a local and a regional perspective:

- The Pacific Interchange is the only alternative that allows direct and reliable transit connections between SR 520 and Sound Transit's North Link Light Rail station at Husky Stadium. Taxpayers have a right to expect these multi-billion dollar transportation projects to connect.
- The Pacific Interchange is the only alternative that improves, rather than worsens, the flow of local traffic on Seattle streets, particularly traffic north of the Montlake Cut.
- The Pacific Interchange minimizes the negative impacts on all the Seattle neighborhoods through which SR 520 passes, including Montlake, Portage Bay / Roanoke Park, and North Capitol Hill, and maximizes the enhancements to these neighborhoods. These enhancements include new trails and parklands that are contiguous to the Arboretum and benefit the entire region.

- The Pacific Interchange is the only alternative that holds the potential for restoration of bus service to Northeast Seattle / SR 513 [see Metro letter dated July 27, 2006].

The "base 6 lane" alternative under consideration fails to achieve the critical goals of improving transit connectivity and local traffic flow through the SR 520 corridor, and has numerous unacceptable impacts:

- Even the smallest of the interchanges proposed for Montlake is completely out of scale with the neighborhood. Due to the topography and the location of access ramps, there is no configuration for a lid over this interchange that would mitigate these impacts for the Montlake community.
- The base 6 lane alternative is projected to worsen congestion on arterial streets that provide access to SR 520.
- Under the base 6 lane alternative, the Portage Bay viaduct would need to be widened to 8 or 9 lanes. This would have significant negative impact on wetlands, parkland, and homes and businesses in the Portage Bay, Roanoke Park, and North Capitol Hill neighborhoods.

Many Montlake residents are employed by or affiliated with the University of Washington. They are some of the Pacific Interchange's best informed and most enthusiastic supporters. The University will significantly expand in the coming decades, placing substantial additional demands upon surrounding neighborhoods and on the transportation network. Pacific Interchange is the only alternative with the potential to provide the transportation infrastructure needed to responsibly handle the UW's growth. We are hopeful the University will participate constructively in the planning process.

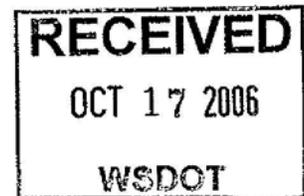
Many members of the Montlake Community Club are especially sensitive to the impacts any of the alternatives might have on the Arboretum and Botanical Gardens. Our members have made clear that while they strongly support the Pacific Interchange, they will demand that all efforts be made to minimize and / or mitigate Arboretum impacts.

In summary, the 1300 household and business members of the Montlake Community Club overwhelmingly support the Pacific Interchange as the preferred replacement for SR 520.

Please contact me with any questions or comments.

Sincerely, 

Robert Rosencrantz
President, Montlake Community Club
1866 East Shelby Street
Seattle, Washington 98112
206-726-9999 office 206-322-7673 home
Email: rosencrantz6@hotmail.com



cc: Montlake Community Club Board of Trustees
cc: Mr. Paul Krueger, Environmental Manager, SR 520 Project, WSDOT



City of Seattle Department of Neighborhoods

Bernie Matsuno, Acting Director

Gregory J. Nickels, Mayor

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

October 18, 2006

Members

- Matthew Fox (Co Chair)
- Daniel Kraus (Co Chair)
- Caroline Colon
- Betty Swift
- Kit O'Neill
- Brett Frosaker
- Eric Larson
- Dave Eckert
- Pat Cowen
- Chris MacKenzie
- Neal Lessenger
- Adel Sefrioui
- Matthew Stubbs
- Heather Newman
- Ashley Emery

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

Mr. Krueger,

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

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

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

Thank you for considering our comments.

Sincerely,

Matt Fox, Co-Chair
CUCAC

Danny Kraus, Co-Chair

cc: Mayor Greg Nickels
Seattle Councilmembers



C-010-001

Alternates

- Chris Leman
- Neal Wechsler
- Tom Roth
- Larry Sinnott
- Brian Ramey
- Ruddi Risler
- Mark Holden

Ex-Officio Members

C-010-002

- Cliff Louie - DON
- Theresa Doherty - UW



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

Re: SR 520 DEIS RESPONSE FROM ARBORETUM FOUNDATION

Dear Mr. Krueger:

INTRODUCTION

Washington Park Arboretum is an internationally recognized treasure that all of us here in Western Washington have the benefit of enjoying and the responsibility to protect. It is a 230-acre classroom, park, and museum; it is home to a world-class plant collection, an Olmsted Legacy, Works Progress Administration-built artifacts, fragile habitat, and Seattle history. As a site eligible for standing on the National Register of Historic Places, impacts of the SR 520 project need to be carefully considered.

The Arboretum Foundation's mission is to protect the Arboretum – to preserve, steward and expand the botanical, educational, and recreational opportunities afforded by this unique and irreplaceable resource. This letter summarizes our position with regard to protecting the Arboretum from the impacts of the proposed SR 520 expansion. In short, we are concerned with the proposals contained in the DEIS and even more troubled by the lack of study done in certain key areas.

Our primary concerns and needs center around finding a *feasible and prudent option* that ensures there will be:

- 1) no net loss of publicly held parkland or currently accessible open space in the Arboretum
- 2) no net loss or impairment to the plant collection and wildlife or their future health
- 3) no increase of traffic traveling north/south through the Arboretum
- 4) a limited increase of traffic traveling east/west through the Arboretum's wetlands
- 5) no net loss of physical meeting and office facilities for the Arboretum Foundation and the other Arboretum partners' management and maintenance functions
- 6) no net increase to negative intangible conditions (e.g. visual, audio, air quality, light, green space, educational opportunities, or international reputation or significance).

DISCUSSION

Following are a series of comments connected with each of the foregoing primary concerns:

- 1) no net loss of publicly held parkland or currently accessible open space in the Arboretum

All options presented in the DEIS involve taking of parkland and open space, and the Pacific Interchange option is particularly onerous with the permanent filling and shading of high-quality lake fringe wetlands. Further, there has been inadequate (if any) study offered to assess the impacts imposed by the size and magnitude of proposed projects, especially the Pacific Interchange option, which has a magnitude and footprint well beyond any reasonably prudent option.

c-011-001

c-011-001

2) no net loss or impairment to the plant collection and wildlife or their future health

As discussed above, the options proposed, (particularly the Pacific Interchange) result in the taking of land and open space as it relates to irreplaceable wetland and its contribution to the collection and wildlife. We believe the collection and wildlife habitat would be permanently impaired due to the taking.

Also, plant collections and habitat in the areas to be impacted by the construction and final alignment of the proposed SR 520 expansion include riparian understory and overstory (Betula, Populus, Nyssa, Salix, etc.). These are among the most striking and outstanding specimens in the Arboretum for the purposes of demonstrating vegetative accommodation to varying hydrologic conditions, geologic conditions and aesthetic and practical uses in the region. Many of these plants are rare, documentation difficult, and growth to specimen size lengthy, difficult and expensive. Moving a plant collection is equally difficult and expensive. It is also unlikely to succeed, given the lengthy construction period, pollution, dust and changing hydrologic conditions of the construction zone, and lengthy disruption to a static natural condition on which most of these non-natives depend.

Finally, the zone of impact of the DEIS needs to be redrawn at Madison Ave, and the impacts to the Arboretum evaluated in that light. The proposed traffic increase (50% or more) to Lake Washington Boulevard (LWB) exacerbates already high levels of air and water pollution to which the Arboretum is uniquely susceptible. The Arboretum's canopy traps air pollution and heat, and runoff from LWB flows directly into Arboretum Creek. The result would be immitigable in our preliminary assessments, and the DEIS appears generally not to have considered the impacts.

3) no increase of traffic traveling north/south through the Arboretum

All options presented effectively create an expressway through the Arboretum on LWB. LWB was originally designed for 4,000 trips each day, and currently accommodates 19,000. The four and six lane options presented would increase daily trips to 33,000, and the Pacific Interchange to as many as 53,000. The DEIS failed to study the impact of traffic along LWB. We believe the impact would be substantial, both the direct physical deterioration of the collection and environment, as well as the ongoing impacts of noise, sight and safety.

4) a limited increase of traffic traveling east/west through the Arboretum's wetlands

The options presented in the DEIS seem to directly encourage increased single-occupancy-vehicle travel east/west through the Arboretum's wetlands (particularly the Pacific Interchange option). We are not in favor of any option that causes greater air and water pollution impacting the Arboretum's wetlands. We are also not in favor of any option that causes an increase in other negative intangibles as discussed in issue #6, below. Finally, we urge that all partially built ramps which currently exist be removed.

C-011-001

- 5) no net loss of physical meeting and office facilities for the Arboretum Foundation and other direct partners to the Arboretum

The Arboretum Foundation was set to occupy the Museum of History and Industry (MOHAI) building, per the Seattle City Council-approved Master Plan of 2001. Fundraising activities, education program development and expansion, exhibits and lectures were to occur in the offices and auditorium there. The DEIS does not discuss or evaluate the loss of this opportunity for the Arboretum or the Foundation. We consider the loss of the use of this facility significant to the management of education, outreach and other programs. It also negatively impacts the Foundation's ability to raise funds for future capital improvements envisioned in the Master Plan.

- 6) no net increase to other negative intangible conditions (e.g. visual, audio, air quality, light, green space, educational opportunities, or international reputation or significance).

We believe that all options presented (especially the Pacific Interchange) will generate substantially more noise, heat, odor, visual impairment, safety hazards, and general chaos than currently exists in the Arboretum. Any distraction from the reasonable enjoyment, learning opportunity, and appreciation of this treasure is out of sync with the best interests of the Arboretum and its audience. We also believe the DEIS has not adequately studied these impacts.

CONCLUSION

As stewards of the Arboretum and all of its treasures, we:

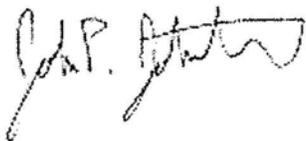
- 1) believe the best *feasible and prudent option* has not been identified and studied
- 2) believe the Pacific Interchange option is the most egregious offender
- 3) believe all options presented would result in net loss of land, collections, and usability
- 4) believe impacts to the Arboretum have been inadequately studied and reported on in the DEIS, and the zone of impact of the DEIS needs to be redrawn at Madison Ave with impacts to the Arboretum evaluated in that light.

Therefore, we call for:

- 1) elimination of the Pacific Interchange option in its current form from further consideration
- 2) identification and study of a more *feasible and prudent option*
- 3) greater study of the overall potential impacts to the Arboretum.

Thank you for the opportunity to comment on the DEIS for SR 520. We ask that you consider the Arboretum as precious as we do. We strongly believe that further analysis of impacts is required, and that the best option will involve substantially less impact to the Arboretum.

Sincerely,



John P Johnston, President
Arboretum Foundation

Save Union Bay Association
Susan Holliday, Ph.D.
3909 NE Surber Dr
Seattle, WA 98105



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

RE: Comments to SR520 Bridge Replacement DEIS
Dear Mr. Krueger,

October 21, 2006

Save Union Bay Association has been in existence for over 30 years and has been instrumental in dealing with environmental issues of Union Bay. These issues include milfoil intrusion, motor boat speed, wetlands management, and the Green Lake pipeline (a plan by Seattle Parks Department to pipe water from Green Lake into Union Bay.) Because the SR520 Replacement Project will have major impact on Union Bay, we plan to be involved and work with the other environmental agencies to propose mitigation.

As mentioned in the DEIS, one of the issues with the bridge replacement and the Pacific Street interchange is the effect on salmon and other wildlife that inhabit Union Bay. A major problem with Union Bay is that it has become shallower over the years due to erosion of shorelines, UW construction projects, storm water run-off, and increased growth of aquatic weeds. In addition, the lake temperature has risen and blue green algae have increased in concentration. These factors create a toxic environment for wildlife, especially salmon and frogs. We are concerned that, because the construction will occur in the deep water part of Union Bay, salmon will be displaced into the shallow, warm water and will be less likely to survive. We believe that there are ways to mitigate the effects of construction and of the completed project.

Save Union Bay Association is acutely aware of the transportation crisis involving SR520 and we are in favor of the 6 lane alternative and the Pacific Street Interchange. We know that this option will cause great distress during construction but that the expansion of SR520 is needed to meet transportation demands in the future. It is likely that there will be modifications to the Pacific Street interchange in response to University of Washington and community needs. We do not plan to dispute issues concerning project design and land options. Our concern is the viability of Union Bay and its wildlife.

Please add us to your mailing list. We will be in contact with you as the mitigation process begins.

Sincerely Yours,
Susan Holliday
Susan Holliday, Ph.D.
President
Save Union Bay Association

Steve Sulzbacher
Steve Sulzbacher, Ph.D.
Vice President

C-012-001



Seattle Yacht Club

Established in 1892

Mr. Paul Kruger
Environmental Manger
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101

October 23, 2006

Re: Comment on Draft 520 EIS

Dear Mr. Kruger:

This letter is to provide comment from the Seattle Yacht Club regarding the EIS recently issued pertaining to the SR 520 Bridge Replacement and HOV Project's Draft Environment Impact Statement.

The Seattle Yacht Club hereby goes on record as supporting the Pacific Interchange option of a 520 revision provided that maximum bridge clearance be at least 110 feet.

The Seattle Yacht Club has 2,500 members plus spouses. The Portage Bay Mainstation, which is now 86 years old, has moorage for 227 boats for its members. The Seattle Yacht Club holds a junior sailing program in the summer for upwards of 400 juniors for both members and non-member youngsters in the community. On the first Saturday in May, the Opening Day of Boating Season is held at the Club with hundreds of participating boats and tens of thousands of spectators lining the Montlake Cut eastward out to Webster Point in Laurelhurst. The Seattle Yacht Club is an institution in this City that counts among its past members and flag officers, many of the individuals instrumental in Seattle's growth and success. The Mainstation is on the National Register of Historic Places. It is in fact an institution that, because of its proximity to the concrete ribbons of highways, is threatened both in terms of enjoyment but also basic use of the water.

While any change in the 520 is going to significantly impact the Seattle Yacht Club its members and guests, of the presented alternatives, the Pacific Interchange offers the best hope of curing the Montlake "mess" without adding an excessive amount of lanes over Portage Bay. An important part of the Seattle Yacht Club's support for the Pacific Interchange, is that any bridge have a full 110 feet of clearance for vessels transiting out of the Montlake Cut to the East, which is what we understand is proposed.

In June, 2002, the Seattle Yacht Club provided comment to WSDOT concerning 520. For your convenience of reference, I am enclosing a copy of our letter dated June 19, 2002 to Secretary Doug MacDonald stating many of our concerns with regard to the SR 520 Bridge Replacement Project ("The Project").

Mr. Paul Kruger
October 13, 2006
Page 2

This Project remains a grave concern to the Officers and Membership of the Seattle Yacht Club. We have conducted a review of the draft EIS ("The Report") and hereby submit the following comments on that report.

1. Encroachment Into Portage Bay by Roadways.

Our primary concern remains that Northerly encroachment into the Portage Bay waterway will limit the access to our dock #1 moorages. The Seattle Yacht Club expects WSDOT to make every effort to present a project alignment and design that essentially constructs the new facility in the footprint of the old facility without going further northward.

2. The Seattle Yacht Club is on the National Register of Historic Places.

Mention is made in several places in the draft EIS of the significance of the Federal Transportation Act of 1966 Section 4(f) regarding preservation of Historic Sites. The report does make mention of the Montlake Historic District that includes the Seattle Yacht Club but does not make specific mention of the Seattle Yacht Club as a designated Historic Site. WSDOT should be aware that the Seattle Yacht Club was listed as a Historic Site; by the Seattle Land Mark Preservation Board on February 1, 2006, by The Washington State Historic Preservation Office on January 27, 2006 and by the National Register of Historic Places on June 9, 2006.

"The designation and listing of the Seattle Yacht Club on the National Register of Historic Places does assure protective review of the property should a federal or state action have a potential adverse effect to the property's historic values" as summarized by Allyson Brooks, PhD, Washington State's Historic Preservation Office, January 27, 2006. The Seattle Yacht Club (SYC) considers Allyson's statement to include the "adverse effect to be both the construction process period and the final end product and its property." The building, its grounds, docks and moorage and waterways, all part of the culture and tradition of many Seattle activities since 1919, are all considered historic values to be considered in this process.

To ensure the security of these assets, the Club Board Members request that FHWA and WSDOT submit as a part of this final EIS statement a more detailed description of the construction process, mentioned in Chapter 8: Construction Effects, page 15, Would Project Construction Affect Navigation Channels? and include a map/diagram illustrating access and egress for materials, equipment and labor force on Portage Bay between the west end of the Seattle Yacht Club Moorage and the east end of the Queen City Yacht Club Moorage. It is expected that this access route will only be used during days and time of days approved by SYC, this under the provisions of Section 4(F) from 23 CFR 771.135 Paragraph (3)(ii). The SYC does not consider the Pacific Interchange option to have a negative impact on the community, but does consider the process of construction as potentially negative in terms of impact.

Mr. Paul Kruger
October 13, 2006
Page 3

3. Roadway Filth

Our review of The Report found that Air Quality related to The Project was well defined as to the types of pollutants, content of pollutants and source of pollutants but show that little or no effort has been made to include into the design of The Project any mitigation to relieve the adjacent neighborhoods of the particulate pollutants generated by the automobiles and trucks from tires and engine discharge. The Seattle Yacht Club is subjected to continual traffic filth raining down onto the boats, buildings and parking lots. This is a costly and cumbersome maintenance project for the Club and for the boat owners who are faced daily with the need to clean their boats from road grime and tire dust. The existing roadways are extremely imposing and there is no reason to expect the new facility to be any improvement without some collecting equipment being included into the design. The Seattle Yacht Club requests that the result of this road filth be somehow mitigated.

4. The "Montlake Mess"- Too Much Congestion

The Seattle Yacht Club's membership only access to their Clubhouse and moorage facilities is from Montlake Boulevard via Hamlin street. Today our membership experiences long waits in an insufficient storage lane to make left turns from northbound Montlake Boulevard onto westbound Hamlin Street. Likewise, members leaving from Shelby Street either northbound or southbound onto Montlake Boulevard face long waits. Careful examination of this Draft EIS shows no relief for our problem *with the exception of the Pacific Street Interchange option*. It appears that the other designs offered are aimed at a greater through-put on both SR 520 and Montlake Boulevard giving little or no relief to congestion. This is an important reason to the Seattle Yacht Club why the Pacific Interchange option should be chosen.

5. Opening Day of Boating Season- Largest Free Event in Seattle

It appears that reconstruction of the western end of SR 520 is inevitable. Seattle Yacht Club urges the WSDOT to go to extreme measures in planning the demolition and reconstruction methods so that their impacts on the Montlake and Portage Bay communities will be minimized. A 7 to 8 year construction period will adversely impact individual boaters and the yacht club itself.

As you may know, the Seattle Yacht Club in conjunction with the University of Washington, on the first Saturday in May each year stages Opening Day of Boating Season, the world's largest Rowing Regatta and Boat Parade as a free event for the general public in Union Bay, the Montlake Cut and Portage Bay. Thousands of hours of volunteer effort are put forth in order to stage this event. Over 100 visiting yacht clubs from the Puget Sound and Canada participated in Opening Day this past year.

The Seattle Yacht Club would like to work with WSDOT in order to minimize the conflicts in presenting Opening Day of Boating Season during the SR 520 construction period.

Mr. Paul Kruger
October 13, 2006
Page 4

6. Traffic Noise Reduction with Sound Walls

c-013-007 | The Report addresses the impacts of traffic generated noise and the potential mitigation provided by sound deflecting or absorbing walls. In addition, The Report explains the extent that the various alternatives will present visual impacts. The Seattle Yacht Club expects WSDOT to optimize the design of the Portage Bay Viaduct to achieve the greatest reduction of noise impacts while minimizing the visual impacts of that structure.

c-013-008 | 7. Seattle Yacht Club Endorses the Pacific Interchange Option

The Seattle Yacht Club upon review of the Draft EIS finds the Six Lane Alternative with the Pacific Street Interchange Option to have the least impact and the greatest benefit to the surrounding neighborhoods while still providing an optimum increase in traffic volume and reducing traffic on Montlake. It appears without question to be the best solution.

8. 110 Foot Clearance Height of Bridge Handling Boat Traffic From Montlake Cut
Consideration of the other Alternatives and Option presents WSDOT with a dilemma of construction of a high level or a low level Union Bay Bridge in the Pacific Street Interchange Option. The Union Bay Bridge will have a visual impact for Yachtsmen especially for the Opening Day Rowing Races and boat parade. Functionally, the low level minimum clearance of about 110 feet would be adequate to satisfy the needs the recreational boating community and commercial vessels. 110 feet is the clearance that must be maintained for any new bridge structure and implementation of the Pacific Interchange Option must include this bridge height.

c-013-009 | 9. The Construction Process Will Be A Substantial Adverse Impact

The construction process will no doubt take many years. The construction process of a project of this magnitude will unquestionably have a huge impact on the greater Montlake area which includes the Seattle Yacht Club. In light of this, we believe that the citizens in the greater Montlake area, specifically and most centrally including the residents of Shelby and Hamlin Streets, along with the Seattle Yacht Club, must have input and be given a final authority for approval of the construction process.

We ask for this under the auspices of the section 4(F) which obligates the State to not interfere with the cultural aspects of historic places. For instance, we might object to having any activity after 5 PM and on weekends because of clubhouse and waterborne activities. In the alternative and in addition, a complete review of accelerated construction should be undertaken such as was carried out for the Santa Monica Freeway following the Northridge earthquake. An accelerated program of construction, with proper mitigation and economic incentives to the contractor, could result in cutting the construction time by half or possibly more, which in an overview, might have less impact on the Montlake neighborhood and the Seattle Yacht Club.

During the summer, our junior sailing courses, which take place in Portage Bay, will be jeopardized during construction. The weeklong celebration of Opening Day in early May brings thousands of people to the Montlake Cut and Portage Bay. There are many other

Mr. Paul Kruger
October 13, 2006
Page 5

C-013-009

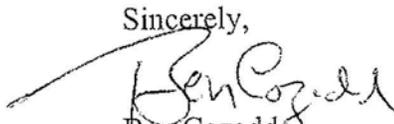
conflicts, not to mention the incredible daily burden of noise and inconvenience that will be placed on the immediate residents of Hamlin and Shelby streets. This underscores the need for the Seattle Yacht Club and the Montlake neighborhood to be integrally involved in the construction process.

The Seattle Yacht Club looks forward to the SR 520 Bridge Replacement and HOV project to be a safe, quickly built facility that is successful in reducing traffic congestion for the motoring public yet preserving all boating alternatives and employing mitigation measures for dust, noise and avoiding any northward encroachment into Portage Bay.

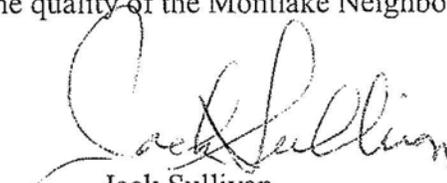
C-013-010

The Seattle Yacht Club wishes to fully participate in the mitigation planning of this most significant project that has many significant adverse impacts. We are available to meet with you at any time to discuss our concerns and to offer suggestions as to how this project can preserve the quality of the Montlake Neighborhood.

Sincerely,



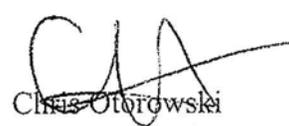
Ben Cozadd
Commodore



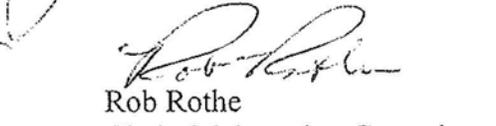
Jack Sullivan
Vice Commodore



Fred Roed
Rear Commodore



Chris Otorowski
Staff Commodore



Rob Rothe
Chair, Mainstation Committee
Seattle Yacht Club

- Cc: Douglas B. MacDonald, Secretary WSDOT
Governor Christine Gregoire
Senator Patty Murray
Senator Maria Cantwell
Congressman Jay Inslee
Congressman Rick Larsen
Congressman Brian Baird
Congressman Doc Hastings
Congresswoman Cathy McMorris
Congressman Norm Dicks
Congressman Jim McDermott
Congressman Dave Reichert
Congressman Adam Smith
Mayor Greg Nickels
Councilman Richard Conlin
Councilwoman Sally Clark
Councilman Nick Licata
Councilman David Della

Mr. Paul Kruger
October 13, 2006
Page 6

Councilman Jan Drago
Councilwoman Jean Godden
Councilman Richard McIvor
Councilman Tom Rasmussen
Councilman Peter Steinbrueck
Richard Ford, Chair, Washington State Transportation Department
Ed Barnes, Member, Washington State Transportation Department
Robert Distler, Member, Washington State Transportation Department
A. Daniel O'Neal, Member, Washington State Transportation Department
Elmira Forner, Member, Washington State Transportation Department
Dale Stedman, Member, Washington State Transportation Department
Carol Moser, Member, Washington State Transportation Department
Mark Emmert, President, University of Washington
Kate Battuello, Montlake Community Club
Rob Wilkinson, Montlake Community Club

SYC



Dwight G. Shaw
Commodore

Seattle Yacht Club

Established in 1592

June 19, 2002

Douglas B. Mac Donald, Secretary
Washington State Department of Transportation
Post Office Box 47300
Olympia, Washington 98504

Dear Mr. Mac Donald,

I am writing to you to express my concerns regarding the Translake Washington Project. I am the current Commodore of the Seattle Yacht Club. We have more than 2000 members in this region. Our club will celebrate its 110 birthday this year. We have resided more than 80 years at our Portage Bay Station. Many of our traditions are rooted in our Historic Clubhouse and its associated facilities.

The Translake Washington Project, as proposed, will severely impact the Seattle Yacht Club's Portage Bay Station. I fear that the Project's impacts will permanently degrade this Club and its associated facilities. It is for these impacts that I must notify you that Seattle Yacht Club is joining with our neighbors in the Montlake Community and other citizens of the City of Seattle in support of the "Do No Harm" theme. We fully support the positions of Representative Frank Chopp and Representative Edward B. Murray as stated in their letter to you dated March 8, 2002.

March 27, 2002 the Seattle Yacht Club Board of Trustees met to review and consider the Translake Washington Project plans. My Board of Trustees adopted the following statement of concerns that I wish to bring to your attention:

1. Depending on the final configuration and location of the roadway, the new facility will certainly further encroach into the waterways surrounding our club and its moorages.
2. The Seattle Yacht Club currently gets significant amounts of dust, dirt, noise, tire and exhaust fume pollution created by the traffic on the present viaduct roadway. The waters around the club contain contaminants from the Freeway that kill fish and other marine life. A larger facility with more traffic is certain to exacerbate these problems.

3. Montlake Boulevard is the only ingress and egress for SYC members and their guests. Access to the club is currently congested. Left turns by northbound traffic on Montlake Blvd to Hamlin Street and left turns onto Montlake Blvd from Shelby Street are currently extremely difficult. We understand that the City of Seattle will not allow the Montlake Bridge to be modified nor can Montlake Boulevard be widened in the area of Hamlin and Shelby Street by prior agreement. We encourage the City to maintain this position.
4. The present Portage Bay viaduct and the upgraded facility will continue to create a visual impairment, not only for the club but also to the entire neighborhood.
5. The Shelby-Hamlin Street district dates back prior to the 1920's and the opening of the Montlake cut. This district has been well maintained and represents a significant Historical place in the development of this city. We object to this area being inundated with additional freeways, arterials, bridges and/or tunnels.
6. We think that trying to solve all of our present cross-lake transportation problems with an expanded SR-520 is unrealistic.

I fear that the approach that you and those who you have assigned to provide solutions for our transportation problems are taking a myopic patchwork approach. As a result, they have promulgated a series of projects at various pinch points that tends to just move our traffic congestion from one point to another.

I see that most metropolitan areas around the country have constructed a system of beltways that allows traffic to flow around their down town areas. Where are our beltways? Why not build an Interstate 605 beltway to relieve the North/South traffic currently on I-5 and I-405? A truck traveling from Vancouver BC to Portland has absolutely no interest in driving under the convention center through downtown Seattle.

The most important project to our region is the reconstruction of the Alaskan Way Viaduct. This must be done immediately, for failure of that facility will further strangle North South transportation

I ask you, Why not build an east-west connector from I-5 to SR-522 along the King County-Snohomish County line. I am sure that your traffic studies will show reductions in volumes on both I-405 and SR-520 from construction of a northern bypass.

Public transportation alone cannot solve our traffic congestion. Rail constrains travel to narrow corridors. Buses add to congestion and overhead wires are visual pollution. Having to make one or more transfers on a public conveyance places that mode of travel at a psychological disadvantage because of the fear of missing a connection and having to

wait a half hour or more for the next bus. In general buses serve only a few who happen to live in one place and work in another place that a bus happens to connect. I feel that you must de-emphasize your reliance on Public Transportation for a solution to the traffic congestion in the Puget Sound region.

Finally, I believe that it is time to revisit the potential gains that can be derived from a third Lake Washington crossing at the Jaunita to Sand Point location. This would certainly help our University of Washington, Laurelhurst and Sand Point neighborhoods and pull their traffic out of the Montlake community.

Thank you for letting me make comments on the Translake Washington Project and its associated traffic concerns.

Sincerely,

Dwight G. Shaw
Commodore

Distribution:

The Honorable Greg Nichols
Councilman Richard Conlin
Councilman Richard McIver
Councilperson Heidi Wills
Councilman Paul DeMitriades
Mayor Alan Merkle
Senator Pat Thibaudeau
Representative Frank Chopp
Representative Edward Murray
Councilman Larry Gossett
Clarissa Easton
Peter Staten
Terry Baker
Phil Butler
Bill Munday
Jean Amick
Chris Leman
Jim Reckers
Red Lane
Maurice Cooper
Cornelius & Gloria Peck
Jorgen Bader
Alan Jones

Tran slake Project
Impacts on
Seattle Yacht Club

Air Quality

Increased exhaust gases in atmosphere will degrade the air quality within the club facilities.
Increased exhaust gases in the atmosphere will affect the frequency for cleaning repainting facilities
Increased airborne particulate raining down onto SYC boats in moorage and facilities

Water Quality

Airborne exhaust gases and particulates degrading waterways
Project storm runoff degrades waterways.
Floating scum collects on boat hauls and causes increased maintenance.

Visual Pollution

Portage Bay viaduct creates a manmade visual barrier to the adjacent panorama views and sky.
Signs and barriers walls creates visual impairment of panoramic view from club

Noise Pollution

Increased traffic closer to SYC adds to the ambient roar at clubs facilities.

Increased Traffic Congestion

Project revisions restricts and encumbers access to club facilities.

Reduced Waterway and Navigational Space

Reconstruction Portage Bay viaduct reduces the space available for navigation in the areas adjacent to the club facilities.

Wildlife Impacts (Raccoons, beaver, ducks and geese etc)

Fish Impacts (degradation of fish habitat)

Endangered Species (Portage Bay crayfish)

Seismic Risks (collapse of Portage Bay viaduct could cause a tsunami effect to boats and Club facilities)

Wetland (Does the club have any land classified as wetlands?)

Parking (Reduction of available parking)

Portage Bay Habitat (Has the UofW done any studies on Portage Bay with regard to their Fish hatchery?)

From: [Jean Amick](#)
To: [Krueger, Paul W \(UCO\); SR 520 DEIS Comments;](#)
CC: [Joe Herrin;](#)
Subject: Fw: Comments from Laurelhurst
Date: Tuesday, October 31, 2006 5:20:14 PM
Attachments: [LCC3223SR520DEISComments.doc](#)

Dear Paul,
Here are the official 520 DEIS comments from Laurelhurst Community Club. Please put into the comments' record - and can you please acknowledge that you have received this letter?
Thank you,
Jean

October 31, 2006

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

RE: SR 520 Replacement and HOV Project, Comments on the DEIS

Dear Mr. Krueger:

The Laurelhurst Community Club offers the following comments on the Draft Environmental Impact Statement (DEIS) for the SR 520 Replacement and HOV Project. We attach and incorporate by reference the Laurelhurst position statement of September 11, 2006.

Arboretum: We are concerned about the impact of all of the proposed alternatives on the Washington Park Arboretum. All proposals would take Arboretum land, destroy valuable plantings and tree collections and destroy wetlands. In this regard, the Pacific Interchange alternative is particularly detrimental to the health and well-being of this treasured park setting that serves as a habitat for birds, wildlife and endangered species. As noted on page 4-41, the Pacific Interchange would fill .2 acres of wetlands and require a 5.3 acre buffer, as compared to the 2 acre buffer required under the four-lane option. The shading that would result from the Pacific Interchange option would amount to 7.8 acres of wetlands and a 1.3 acre buffer, as compared with the 4.5 acres of shading and 2.3 acres of buffer required by the four-lane option. The DEIS should study ways to minimize impacts to the Arboretum and preserve the beautiful and pristine open space to ensure no net impact. Further study of the

C-014-001 | pollution and noise that would result from the Pacific Interchange alternative and vehicle traffic through the Arboretum is necessary.

C-014-002 | Coordination with other planning efforts: On page 2-36, the DEIS recognizes that the University of Washington and the Washington Park Arboretum have adopted master plans that will affect development in the SR 520 project area. Both of these plans involved extensive public involvement over many years of preparation. How can implementation of these plans move forward with a new SR 520 bridge, particularly under the Pacific Interchange alternative? The DEIS does not adequately explain why little traffic increase is projected through the Arboretum along Lake Washington Boulevard in the Pacific Interchange Option.

The DEIS does not discuss how the various options, especially the Pacific Interchange, would fit in with the goals and action items in the University Community Urban Plan. This neighborhood plan, developed over an extended period of time with involvement from the City and the University of Washington envisions restriction of vehicular traffic to a minimum, through such programs as U-Pass, and creation of a pedestrian-friendly environment. Building more lanes and the massive Pacific Interchange is contrary to the neighborhood plan. Analysis of the alternatives in light of neighborhood planning efforts should be undertaken.

C-014-003 | Air quality: As noted in the DEIS beginning on page 2-36, several air pollutants are associated with vehicle emissions from heavy traffic congestion in the project area. Due to violation of federal air quality standards in the 1990s, the U.S. Environmental Protection Agency designated the region as a “maintenance area” that requires extra care to prevent future violations and preparation of state implementation plan to meet and maintain compliance with air quality standards. The Puget Sound Regional Council has suggested that emissions of particulate matter will gradually increase between 2010 and 2030 as traffic volumes increase. A new SR 520 will add two more vehicle lanes thus many more vehicles—a major source of pollutants. Is creation of more traffic lanes into Seattle and the Puget Sound area counterproductive for the city’s anti-global warming efforts and pro-clean air efforts? Additional studies are necessary to determine that added vehicle trips through the Arboretum and the impact on the trees, plant collections and habitat.

C-014-004 | Wetlands: The DEIS does an excellent job in pointing out the importance of wetlands in providing economic and ecological benefits through a number of physical, chemical, biological and social functions, beginning on page 2-41. The problem with the DEIS and its technical appendices, however, is that the impacts of all of the alternatives, especially the Pacific Interchange option are minimized. Starting on page 5-43, the effects of the project on Seattle’s ecosystems are reviewed in a summary fashion. We agree with the University of Washington wetlands consultants that “several important analyses of environmental effects are either not performed, performed using questionable assumptions or inappropriate analyses, or some of the conclusions within

c-014-004 | the DEIS are based on analyses or data that are not provided within the DEIS or its Technical Appendices.”

Statements about the shading impacts on the wetlands are inconsistent and not substantiated by the scientific literature. In discussing the Union Bay wetlands, no citations are listed document the claims made in the DEIS.

c-014-005 | Noise: On page 5-19, the DEIS states that the noise situation would improve substantially if either of the build alternatives were built. Applying noise abatement criteria, the DEIS states that the four-lane alternative would be noisier than the other options (other than the no build alternative). This statement ignores the possibility for lids to address noise issues. It also ignores noise under 66 decibels and above the first floor, both of which are worse with the six-lane alternatives. It defies logic to suggest that more vehicles will not result in more noise, or that Laurelhurst will not have noise impacts with a new six-lane alternative 400 feet closer on the north side. Further study and analysis is necessary in this regard. What will be the impact of increased noise on the University Medical Center?

c-014-006 | Visual blight: The DEIS fails to adequately address the visual blight that would result with the Pacific Interchange alternative. For example, on page 6-1, it is stated that “changes in scale and appearance are expected to be somewhat noticeable from shoreline neighborhoods...but would not change the quality or character of those views...” We disagree and ask for further analysis. The proposed Pacific Interchange literally runs a string of concrete arches the length of a pristine natural area, destroying peace and quiet and views. The visuals from the Arboretum were not included in the DEIS and should have been, along with further study of the impacts.

c-014-007 | Cost: The Pacific Interchange alternative is costly and there is no assurance that \$4.38 billion will be available to fund this option. The Governor’s Expert Review Panel agrees with this assessment. The four-lane alternative is considerably less expensive and a more fiscally sound approach. A thorough assessment of the costs of each alternative must be undertaken, including the costs associated with mitigation and a reassessment of issues relating to tolls (as explained below). WSDOT should study the possibility of scaling back the four-lane option by reducing the width of the lanes, shoulders and ramps, cutting the Portage Bay viaduct to its current four lanes, and making shoulders intermittent, rather than continuous and thus convertible to future traffic lanes.

c-014-008 | Transit connections: On page 3-28, the DEIS incorrectly states that the Pacific Interchange option “would provide a more reliable transit connection to the Sound Transit University Link light rail station at Husky Stadium than the six-lane Alternative because buses coming from SR 520 to the Pacific Street bus stops would not be affected by congestion on Montlake Boulevard.” The problem is that no bus-to-rail transfer facility for bus riders traveling on SR 520 is proposed at the North Link Husky Stadium station. University of Washington transportation consultants state that it

c-014-008 | would be difficult to construct such a facility and they estimate that an additional 30-50 feet of right-of-way would be required along the east leg of the Montlake Boulevard and Pacific Street intersection. Costs of providing such transit connections should be incorporated in the DEIS and the budget modified to reflect the increased costs. An explanation as to the need for a transit connection should be provided in light of the East Link light rail.

c-014-009 | Traffic: The DEIS includes many exhibits on pages 4-8 and 4-9 showing intersection levels of service on key arterials during morning and afternoon peak hours. The methodology for calculating the levels of service is not clearly outlined in the DEIS. The DEIS also does not indicate the backups that would result from downstream congestion and adjustments made, if any, to the calculated level of service. We agree with the University of Washington transportation consultants that “if adjustments were not adequately made to reflect the impacts of vehicle queues from the downstream intersections or traffic merge points, 2030 arterial intersection levels of service shown in the DEIS are seriously understated. The DEIS should also have shown daily traffic volumes among the alternatives, rather than just during peak hours.

The DEIS also fails to show the impacts on Montlake Boulevard. The DEIS also states that there would be no increase in traffic on Lake Washington Boulevard south of SR 520 under the Pacific Interchange alternative. There are no studies or no analyses to support this conclusion.

c-014-010 | Impact of tolls: The DEIS fails to analyze the impact of tolls and the likelihood that single-occupant drivers will use routes other than SR 520 due to the toll. The toll for a one-way trip in 2006 dollars would be \$3.35 and a round trip would be \$6.70 per day. This will be a strong disincentive for drivers to use SR 520. The amount collected by tolls could be much less than projected for the four-lane alternative and both six-lane alternatives if drivers do not use SR 520. This means that the amount of the toll may have to be adjusted. The total cost of the project could be substantially higher if revenue from tolls does not meet projections in the DEIS. The DEIS should discuss the various possibilities. WSDOT should analyze the forecast traffic volumes with and without tolls and include an analysis of the probable shifts in traffic from SR 520 to I-90 and SR 522 due to the tolls.

c-014-011 | Other tolling issues: On page 3-46, the DEIS notes that its analysis assumes that tolls would not be paid by transit vehicles, registered vanpools, carpools with three or more people or vehicles that use SR 520 without crossing the bridge. The DEIS goes on to state, however, that WSDOT policy on tolling may change in the future. Possible changes to the tolling policy should be analyzed to assess revenue that would be raised and the true costs of each alternative.

c-014-012 | The DEIS notes that tolls would be collected using an electronic toll collection system, rather than manual collection at a toll plaza, thus allowing traffic to flow freely across

c-014-013 | the bridge instead of stopping to pay at the beginning or the end. How will the occasional cars, nonlocal drivers, trucks and buses from instate and out-of-state pay? The DEIS indicates that WSDOT would develop policies to address this. An analysis of how these users would be incorporated into the tolling system should be undertaken and an opportunity to comment allowed.

c-014-014 | Removal of Aurora Borealis Sculptures: On page 3-47, the DEIS notes that the Aurora Borealis sculptures will be removed to accommodate the new highway and returned to the original donor. In 2001, the Laurelhurst Community Club studied the proposal from Max Gurvich to replace the two inoperative “Nellie Cornish” fountains near the western terminus of the SR 520 Bridge with kinetic art sculptures. Prior to that time, for eight years Mr. Gurvich paid for the bi-monthly maintenance of the fountains due to his deep commitment to aesthetics in our urban environment. Because of constant clogging and WSDOT’s unwillingness to assume the maintenance costs, the fountains eventually became defunct in 1989. After over a year of planning involving WSDOT, structural engineers and installation contractors, Mr. Gurvich’s artistic endeavor again brought beauty to surrounding communities and vehicles stuck in traffic on SR 520. After Mr. Gurvich’s extraordinary efforts to address aesthetic issues and an alternative to the defunct fountains, it is not sufficient to merely state that WSDOT will simply give back the sculptures. A plan should be developed to preserve this important art.

Thank you for considering the comments of the Laurelhurst Community Club.

Sincerely,
Jean Amick, LCC Transportation Committee
3008 East Laurelhurst Drive NE
Seattle, Washington 98105
206-525-7065
jeanseattle@earthlink.net

Joseph Herrin AIA, LCC Transportation Committee
5040 47th Avenue NE
Seattle, Washington 98105
206-525 6541
jherrin@heliotrope.cc

ENC: Laurelhurst Position Statement of September 11, 2006

**Laurelhurst Community Club SR520 Position Statement
September 11, 2006**

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

viability.

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

Inter-modal Connectivity

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

Local Traffic Impacts

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

Noise

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

Washington Park Arboretum

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

Project Scale

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

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

Conclusion

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

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

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

Jean Amick, LCC Transportation Committee
3008 East Laurelhurst Drive NE
Seattle, Washington 98105
206-525-7065
jeanseattle@earthlink.net

Joseph Herrin AIA, LCC Transportation Committee
5040 47th Avenue NE

Seattle, Washington 98105
206-525 6541
jherrin@heliotrope.cc

*** eSafel scanned this email and found no malicious content ***
*** IMPORTANT: Do not open attachments from unrecognized senders ***

Jean G. Amick
3008 E Laurelhurst Dr NE
Seattle WA 98105
206-525-7065
jeanseattle@earthlink.net