City of Redmond
WASHINGTON

September 26, 2006

Paul Krueger
Environmental Manager
Washington State Department of Transportation
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101

Subject: Comment Letter on the Draft Environmental Impact Statement for the SR 520 Bridge Replacement and HOV Project

Dear Mr. Krueger:

The City of Redmond has reviewed the Draft Environmental Impact Statement (DEIS) for the SR 520 Bridge Replacement Project. We must preface our comments on the DEIS by stating up front the vital need for full funding for the SR 520 Bridge and corridor improvements to allow construction of this critical facility. With regard to the key bridge and corridor features being considered, we have the following specific comments:

L-001-001

- The City of Redmond supports a **multi-modal transportation** solution for the SR 520 Bridge and corridor.
- The City prefers the **six-lane SR 520 Bridge option**, with the new bridge having two general-purpose lanes and one high occupancy vehicle (HOV) lane in each direction.
- The new SR 520 Bridge and corridor must be built with a design and structure that **allows the incorporation of a high-capacity transit (HCT)** route between Redmond and Seattle.
- The new SR 520 Bridge and corridor must **incorporate a continuous bicycle and pedestrian path** throughout the SR 520 corridor between I-5 and Redmond.

L-001-002

- The City encourages the Washington State Department of Transportation (WSDOT), Sound Transit, the City of Seattle, the University of Washington and affected Seattle neighborhoods to reach agreement on design options and transit access that result in solutions that provide regional benefits and enable the design and construction of the SR 520 Bridge and corridor improvements to proceed without delay;

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L-001-003

- The City urges WSDOT to meet the current schedule for SR 520 Bridge and corridor improvements, with the Final EIS issued in 2007, a Record of Decision in 2008 and bid for construction in 2009;

L-001-004

- The proposed closure of the Seattle-bound HOV lane between I-405 and Lake Washington for over two years due to construction will delay buses and increase travel time for transit riders between the Eastside and Seattle. **This delay is a significant concern**. Please carefully examine the impact of this closure on affected bus routes, such as Sound Transit Route 545 and Metro Route 255, and develop mitigation to reduce this impact as much as possible;

L-001-005

- SR 520 Bridge and corridor improvements and funding **must be coordinated with other regional transportation efforts**, including Sound Transit Phase 2 (ST2) and the Regional Transportation Improvement District (RTID) improvements, so that a comprehensive system of multi-modal transportation improvements is built for the region.

Thank you for considering comments from the City of Redmond. In addition to our comments, the cities of Redmond, Bellevue and Kirkland will submit to you a joint interest statement containing our common position on SR 520 Bridge and corridor improvements. Please contact Terry Marpert at (425) 556-2428 should you wish to discuss the City's comments.

Sincerely,

Rosemarie M. Ives
Mayor of Redmond

Nancy McCormick
Council President

cc: Christine Gregoire, Governor of Washington

City of Seattle

Gregory J. Nickels, Mayor

Seattle Transportation
Grace Crunican, Director

Seattle Bicycle Advisory Board

Emily Allen, Chair
Sean Ardussi
Dongho Chang
Brian Dougherty
Stephanie Innis-Frans
Brian Lee
Rodney Rutherford
Natalie Gulsrud

The Seattle Bicycle Advisory Board shall advise the City Council, the Mayor, and all departments and offices of the City on matters related to bicycling, and the impact which actions by the City may have upon bicycling; and shall have the opportunity to contribute to all

September 26, 2006

Paul Krueger,

L-002-001 The Seattle Bicycle Advisory Board would is writing this letter to point out a missed opportunity in the current SR 520 DEIS. While the Board approves of the bicycle / pedestrian lane on the proposed bridge in both the 4 and 6 lane alternatives, a significant opportunity is being missed to connect the important employment centers of Microsoft as well as parts of Bellevue and Redmond. While Bellevue and Redmond are not directly the responsibility of the Board, many employees in the Bellevue / Redmond high tech area live in and commute from the City of Seattle meaning the potential for increased non-motorized commuting is of regional importance.

There is currently a great multi use trail running alongside SR 520 from Marymoor Park to the vicinity of 124th Ave NE in Bellevue. The proposed multi use trail begins near Yarrow Bay and continues across Lake Washington. Nowhere in the DEIS does it mention that the feasibility was studied for connecting these two important bikeways. The potential to provide access to one of the largest employment centers in the Puget Sound is great, making this an opportunity that must not be overlooked in this project. You would never plan to create a major facility for cars and trucks without considering what will happen with the vehicles once they reach the end of the new facility. It is equally unacceptable to create a new bicycle facility in this manner as well. Under the current alternatives, cyclists are left with absolutely no idea how to connect between these facilities. The Seattle Bicycle Advisory Board strongly recommends that a bicycle / pedestrian connection be studied specifically connecting the new facility across the bridge to Yarrow Point with the existing facility that parallels SR 520 from Marymoor to 124th Ave NE.

Thank you,

Sean Ardussi
Seattle Bicycle Advisory Board
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Seattle, WA
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October 2, 2006

VIA E-MAIL AND MAIL

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

Re: SR 520 Bridge Replacement and HOV Project

Dear Mr. Krueger:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement dated August 18, 2006 (Draft EIS) for the SR 520 Bridge Replacement and HOV Project (Project). On behalf of its citizens, the Mercer Island City Council makes the following comments based upon information presented in the EIS:

L-003-001

1. **Preferred Alternative**.

The City of Mercer Island encourages the selection of the "6-Lane Alternative" resulting in adding one HOV lane in each direction across the bridge as the preferred alternative. The 6-Lane Alternative would complete the regional HOV connection across SR 520 and allow for two general-purpose lanes in each direction. The City supports the 6-lane Alternative for the Project.

2. **Mitigate Adverse Environmental Impacts from 6 Lane Alternative**

L-003-002

It is our understanding that the increase expansion of the SR 520 Bridge, and associated increases in impervious surfaces and loss of environmentally-sensitive areas, within the Lake Washington watershed will require mitigation under NEPA and SEPA. As you may be aware, Mercer Island owns and manages an 84 acre waterfront park known as Luther Burbank Park. This park is located along the northern and eastern shore of Mercer Island and has 4,280 feet of shoreline. Puget Sound (PS) Chinook salmon protected under the Endangered Species Act use this shoreline habitat for juvenile rearing and migration. This park shoreline may provide an excellent opportunity for habitat restoration that could assist the 520 Project meet their NEPA and SEPA mitigation requirements.

L-003-003

To further emphasize the need for habitat mitigation, it is our understanding that the Pacific Interchange Option will place four large columns in the path of all migrating fish, as well as

L-003-003 increase the impervious surfaces and storm water runoff into Lake Washington. This option could increase the predation effects to PS Chinook as well as further degrade the water quality in Lake Washington.

We recommend the EIS be amended to provide detailed environmental impacts for all the alternatives, including the indirect and cumulative effects under NEPA and SEPA. In addition, a detailed mitigation should be developed for the EIS so we may better understand the associated environmental impacts of all of the alternatives.

L-003-004

3. Tolling.

The Draft EIS lists the following adverse effect as one that cannot be mitigated:

> The need to pay tolls to cross the Evergreen Point Bridge. If the SR 520 project is built, drivers would have to pay to use the Evergreen Point Bridge-a crossing that is free today.

The decision to toll the Evergreen Point Bridge must also be evaluated as an indirect and cumulative effect on the I-90 corridor. The Draft EIS should be amended to include this indirect and cumulative effect. The City of Mercer Island requests that all tolling decisions be thoroughly studied by WSDOT to insure there is no adverse environmental impact on the City of Mercer Island by increasing traffic within the I-90 corridor or adversely impacting Mercer Island residents ingress to or egress from Mercer Island.

4. I-405 Expansion

The City supports expansion of the I-405 corridor from SR 520 south to I-5 (e.g. southern section of corridor).

Thank you for considering Mercer Island's comments on the Draft EIS and please do not hesitate to contact City Manager Rich Conrad if you require further clarification of these comments. The City reserves the right to comment further in the event further studies, analysis or new information becomes available.

Sincerely,

Bryan Cairns

Bryan Cairns,
Mayor

Copied: Mercer Island City Councilmembers
Doug MacDonald, WSDOT Director
Joni Earl, Sound Transit CEO
Paul Tanaka, Sound Transit Engineer
Rich Conrad, City Manager
Deb Symmonds, Deputy City Manager
Londi Lindell, City Attorney

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October 6, 2006

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

RE: SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement

Dear Mr. Krueger,

L-004-001 The comments on the SR-520 Bridge Replacement & HOV Project Draft Environmental Impact Statement (DEIS) are submitted on behalf of the Medina City Council. The Medina City Council supports the 6-Lane Alternative between I-405 and I-5 (two general purpose lanes and one HOV lane in each direction).

The Medina City Council has reviewed the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement and selected a preliminary alternative. Based on our review of the DEIS, we believe the project most appropriate for the region and the city of Medina includes:

- A six lane SR 520 corridor that allows for future expansion to accommodate high capacity transit;
- Continuous bicycle/pedestrian facility on the north side of the highway that connects without gaps to the SR 520 trail east of I-405;
- Transit flyer stops at 92nd Avenue NE and Evergreen Point Road;
- Direct access ramps at 108th Avenue NE for transit and HOV users.

L-004-002 The Medina City Council has identified several concerns, which we wish to share. Our interest is to seek reasonable solutions that will protect established neighborhoods and the natural environment while meeting transportation demands. The following bullet point comments address real concerns identified by the Medina City Council:

- Added congestion at 92nd Avenue N.E. westbound off-ramp and 84th Avenue N.E. westbound on-ramp.

L-004-003
- Medina residents will experience the most construction effects on the Eastside. As such, the City of Medina would like to work closely with WSDOT to develop a reasonable and appropriate mitigation plan prior to the start of any construction.

L-004-004

- The City of Medina is committed to working with WSDOT to develop a mitigation plan for the bridge operations facility, to be built in Medina, for both construction issues and on-going operational issues.

L-004-005

- The City of Medina is concerned about the potential adverse impact to residents' properties and strongly encourages WSDOT to work with property owners to avoid undesirable partial acquisitions of properties.

The following bullet point comments are arranged by the referenced page numbers of the DEIS and are provided to address more specific issues.

L-004-006

Page 2-35 (*Medina's Comprehensive Plan policies support developing a bicycle path along SR 520 and across the Evergreen Point Bridge, improving access to transit and pedestrian facilities, increasing public transit and HOV use within the SR 520 corridor, and mitigating the noise and appearance of SR 520.)*

Medina's Comprehensive Plan policies relative to SR 520 specifically state:

- Minimize impacts of regional transportation facility on adjacent residential uses.
- Maintain and enhance access to public transportation.
- Maintain and/or improve local and regional air quality.
- Retain current transit stops at 92nd Avenue N.E. and Evergreen Point Road.

L-004-007

Page 2-49 (*Fairweather Creek Basin)*

- City of Medina, in cooperation with a Puget Sound anglers' association, have maintained a salmon incubator in Fairweather Creek near SR 520 since 2001.

L-004-008

Page 3-7 (*Alternatives and options studied in detail in the Draft EIS)*

- Elimination of the Evergreen Point Freeway Transit Stop option is <u>not</u> supported by City of Medina or by neighboring cities/towns.

L-004-009

Page 3-31 (*6-Lane Alternative*)

- WSDOT is encouraged to continue working with local community representatives on the design and landscaping treatments for the lids.

L-004-010

Page 4-10 (*Affect on local traffic and parking*)

- The Draft EIS addresses traffic and parking impacts at the intersections of Bellevue Way and Northup Way, 92nd Avenue N.E. and SR 520 westbound ramp, but does not address impacts on 84th Avenue N.E. at N.E. 24th Street, Points Drive or the SR 520 westbound ramp. How will the project affect traffic on 84th Avenue N.E. and Points Drive? What is the current and projected LOS rating at intersections along 84th Ave. NE between N.E. 12th Street and the SR 520 westbound on-ramp?

L-004-011

Page 4-15 (*Affect on navigation channels*)

- City of Medina prefers the minimum height possible for the Eastside high-rise. As such, the City of Medina supports maintaining the existing height. If an increase is necessary, Medina strongly urges an increase to no greater total height than the proposed 70-foot clearance.

L-004-012

Page 4-19 (*Air quality*)

- PM2 should be addressed even without EPA standards. What is current level? What is projected 2016 and 2030 level?

L-004-013

Page 4-23 (*Public services and utilities*)

- What mitigation measures will be taken to reduce the impact of service disruptions? e.g. EPR water main

L-004-014

Page 4-26 (*Appearance of project area after completion*)

- How will the new bridge affect panoramic views of the lake from homes in Medina located along the east shoreline?
- Continued efforts to improve the aesthetic appearance of the bridge from public and private vistas are encouraged.

L-004-015

Page 4-28 (*Noise*)

- Permanent noise barriers should be installed in advance of the project or, at a minimum, as the first phase of project. This was previously agreed to by Mr. Les Rubstello of WSDOT as a mitigation measure.
- The City of Medina strongly encourages the use of quiet pavement in addition to other noise reduction treatments.

L-004-016

Page 4-33 (*Construction Effects*)

- What are the hours of work?

L-004-017

- What method(s) will be used to control dust and how frequently will dust control measures be required?

L-004-018

- As previously noted, construction of noise walls prior to construction will help to reduce construction effects as well as ongoing impacts after project construction is completed.

L-004-019

Page 4-41 (*The project also would replace or improve up to eight Eastside culverts that currently block fish passage, opening new areas of upstream habitat to salmon and other species.*)

- Will opening new areas of upstream habitat to salmon and other species effect Fairweather Creek? If so, how?

L-004-019

Page 7-32 (*Fairweather Creek Basin*)

- The City of Medina has installed and maintained a Salmon incubator in Fairweather Creek since 2001. See comment above – page 2-49.

L-004-020

Page 8-29 (*Air Quality change as a result of construction*)

- The City of Medina understands that new federal regulations currently require the use of low-sulfur diesel fuel in on-road trucks and, beginning in 2010 will require construction equipment to use low-sulfur diesel fuel. However, if the project starts prior to 2010, construction equipment involved with the project should use low sulfur diesel fuel voluntarily. This would avoid mid-project equipment retrofits.

We appreciate the past efforts of WSDOT and, in particular, the SR 520 Project staff in working closely with the local communities to address concerns and to obtain input by those most affected. We look forward to a continued productive relationship with WSDOT as the environmental review, design and construction process is completed.

Sincerely,

Miles R. Adam

Miles R. Adam, Mayor
City of Medina

Cc: Medina City Council
Douglas J. Schulze, City Manager
Joe Willis, Director of Public Works

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October 9, 2006

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

RE: SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement

Dear Mr. Krueger,

L-005-001

The Bellevue City Council supports the reconstruction of the SR 520 corridor between I-405 and I-5 as a six lane facility (two general purpose lanes and one HOV lane in each direction). It is clear from the DEIS that a tolled six lane corridor will carry far more people than the four lane alternative. The new HOV lanes would provide the main transportation benefit. Because of this, it will be critical for WSDOT to design a system that provides the maximum benefit to transit, vanpools, and carpools, while not undermining general purpose traffic capacity.

The Bellevue City Council has reviewed the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement (DEIS), has selected a preliminary preferred alternative, and has identified several concerns we wish to share. We seek solutions that reasonably address travel demands while protecting established neighborhoods and the natural environment. The SR 520 DEIS reflects the magnitude and extent of study that WSDOT has undertaken over the past nine years in conjunction with the greater region to fully evaluate all reasonable solutions. Clearly, it is time to act to address the vulnerabilities and travel demands of the corridor.

Based on our review of the DEIS, we believe that the region should pursue:

- A six lane SR 520 corridor that allows for future expansion to accommodate high capacity transit;
- 108th Avenue Northeast direct access ramps for transit and HOV users;
- Transit flyer stops at 92nd Avenue Northeast and Evergreen Point;
- Pacific Interchange with direct access ramps for transit and HOV users; and
- Continuous pedestrian/bicycle facility on the north side of the corridor that connects without gaps to the SR 520 trail east of I-405.

Given the future importance of transit to the corridor, we view a direct access ramp at 108th Avenue NE/SR 520 as an essential component of the project. This option would better match the overall corridor design and functionality than the Bellevue Way HOV lane option. The Bellevue Way option would introduce a significant weave across congested general purpose lanes for buses using the new HOV facilities and the 92nd Ave NE transit flyer stop. This weave could undermine the functionality of the investment and would compromise its reliability, particularly during peak travel periods.

We support WSDOT's efforts to design the new floating bridge in such a way that future implementation of high capacity transit can be accommodated. We also support the inclusion of the Evergreen Point Freeway Transit Stop so that adequate right of way is preserved for future high capacity transit use. Without this added width, it appears that costly and disruptive reconstruction of the planned Evergreen Point lid would be necessary.

City of Bellevue offices are located at 450 110th Avenue N.E.

L-005-001

The six lane alternative would improve overall mobility to corridor users, particularly with the Pacific Street Interchange. We support inclusion of this option because it would improve access between the Eastside and the University District/Northeast Seattle. The Pacific Street Interchange appears to be the best option for addressing existing and future demand for travel between the Eastside and the University District. The City of Bellevue recognizes that there may be impacts that require mitigation, particularly affecting the University of Washington and the environment. We encourage the Washington State Department of Transportation, City of Seattle, and the University of Washington to continue their discussions regarding the design and mitigation of the Pacific Street Interchange. We are optimistic that a solution can be found that satisfies regional and local transportation needs, the site-specific design issues in the University area, and provides a permanent long-term solution for the corridor.

L-005-002

Additionally, reconstruction of the corridor should include a continuous pedestrian/bicycle path that connects to the existing SR 520 trail east of I-405 in the vicinity of 120th Ave NE. We consider it unacceptable to truncate the path at Points Drive NE, as currently proposed. Again, these types of facilities should be viewed as interconnected systems, rather than isolated components.

L-005-003

How to address impacts has been an ongoing concern for neighborhoods and jurisdictions along the SR 520 corridor. We are impressed that the project team has found ways to alleviate nearly all existing and anticipated noise issues. However, we are concerned that solutions to high noise levels associated with proposed improvements East of I-405 have not been found. We anticipate that the WSDOT funded NE 8th St. to SR 520 "braid" project will build upon the SR 520 DEIS and seek to address noise issues in this area. It is disappointing that some Bellevue residences south of SR 520 near the Bellevue Way interchange would also continue to experience high noise levels. We are optimistic that solutions will be found as design progresses.

The City Council has communicated its desires for the State to pursue noise mitigation aggressively. City of Bellevue Resolution 7375 (adopted June, 2006) states: "The City Council of the City of Bellevue Washington hereby declares its desire for the Washington State Department of Transportation and other applicable agencies to aggressively pursue all noise abatement strategies, traditional and emerging, to mitigate noise generated by the use of major transportation facilities, to levels well below current state and federal guidelines." It will also be important for WSDOT to work closely with the affected neighborhoods to balance noise abatement strategies with potential view impacts.

L-005-004

Bellevue prides itself as "a city within a park." We value our parks, open spaces, natural areas, wetlands, and streams. The SR 520 project proposes to improve its relation with the environment by treating run-off and mitigating wetland impacts by creating new ones. The DEIS states that there are insufficient opportunities for mitigation within the affected basins. City staff have communicated numerous candidate mitigation opportunities that are within the affected basin that we believe could satisfy the need. This presents an opportunity to enhance Bellevue's assets and satisfy WSDOT mitigation needs. We look forward to working with you to realize our mutual goals.

L-005-005

Reconstruction of the SR 520 corridor would clearly have lengthy and significant impacts on the region. We understand the concepts described in the DEIS reflect a worst case scenario and that future work will better define the staging of improvements. It is encouraging to see that the corridor would remain open to traffic throughout the construction period. However, we are deeply concerned with the potential closure of the westbound HOV lane for up to two years for construction staging. While we realize that adequate staging areas are imperative to the project, we expect that transit and HOV demands will be high during construction and therefore continued operation of the HOV lane will be critical. Similarly, we anticipate significant impacts during the reconstruction of major interchanges such as Bellevue Way and 108th Ave NE. We encourage you to continue to refine your construction staging plans and to work closely with Sound Transit,

L-005-005 King County Metro, and City staff to develop workable solutions that include realistic demand management strategies and special transit services, as appropriate.

L-005-006 Bellevue supports moving forward with the SR 520 Bridge Replacement and HOV Project as a six lane facility with a direct access ramp at 108th Ave NE and a continuous pedestrian/bicycle path that connects to the existing trail east of I-405. We look forward to a continued productive relationship with WSDOT to complete environmental review and design processes to develop a financing plan, and to reconstruct the corridor. We strongly encourage the State and region to pursue this project aggressively, while addressing neighborhood and environmental issues. We recognize that the SR 520 corridor represents a large capital investment for the State and region and that funding is a major issue. The cost of delay will only intensify this challenge. Therefore, we are committed to working with the State and region to construct this critical project as soon as possible.

Sincerely,

Grant Degginger, Mayor
City of Bellevue

Cc: Bellevue City Council
Steve Sarkozy, City Manager
Goran Sparrman, Transportation Director
Matt Terry, Planning and Community Development Director
Patrick Foran, Parks and Community Services Director
Denny Vidmar, Utilities Director

Richard Conlin
Seattle City Councilmember

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October 13, 2006

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

Dear Mr. Krueger,

I am writing to comment on the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement (DEIS) from my perspective as chair of the Seattle City Council's SR 520 Committee of the Whole. My comments will cover the size of the design alternatives, effects on parkland and wetlands, and impacts of construction.

L-006-001

Size of the Design Alternatives

Although the DEIS offers a significant amount of data on the impact of the various SR 520 design alternatives, the document fails to present a clear indication of the size of any of these alternatives. The DEIS only provides width measurements of the various design alternatives at mid-span on the floating bridge portion of the roadway. The document does not detail the significantly wider footprint of any of the alternatives for the sections located in the residential neighborhoods of Seattle. Further, the high-level visualizations of the proposed design alternatives do not adequately convey the size of these alternatives.

Data concerning the width of the design alternatives must be made available for the public to fully understand the impact of any of the design alternatives on the areas adjacent to the roadway. Absent such information, it is likely that many of the residents of the impacted communities, as well as the numerous citizens who take advantage of the parklands and wetlands surrounding the SR 520 corridor, will not gain a full appreciation of the impacts of any design alternative. This deficiency is true for both the 4-lane alternative, which is referred to as a "replacement" alternative in the DEIS, yet is significantly wider than the current roadway, and the 6-lane alternative, which can be as much as three-and-one-half times wider than the current facility under certain scenarios.

L-006-002

In addition to providing better information on the size of the future roadway, WSDOT should indicate how the overall size of the footprint could be reduced for the alternative chosen for inclusion in the final EIS. The design alternatives assume the maximum possible width of lanes and shoulders, as well as an increase in the numbers of lanes on exit and entrance ramps. Given the physical confines of the neighboring communities, WSDOT should analyze any possible way of reducing the size of the future roadway—yet it has not done so in the DEIS. In the final EIS,

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L-006-002 WSDOT must indicate ways in which the size of the chosen alternative can be reduced. In doing so, WSDOT should also provide the potential consequences of the narrowing of roadway components on safety, traffic reliability, or other key factors.

L-006-003 Effects on Parkland and Wetlands

One of the most significant drawbacks of any of the SR 520 design alternatives is the proposed acquisition of, or impact on, a significant amount of both parkland and wetlands. SR 520 travels through some of the most important wetland habitat in a metropolitan area in the United States. Any of the design alternatives would negatively impact this environmentally sensitive habitat. Although the ownership of these wetlands varies along the SR 520 corridor, the citizens who use this area for recreational purposes do not distinguish among property owners, and neither do the endangered wildlife species that frequent the area. Simply put, WSDOT must minimize the negative impacts on both wetlands and parklands to the greatest extent possible. WSDOT should ensure that there will be no net loss of any parkland or wetlands area, regardless of the current owner of the impacted land. This commitment would entail both the re-establishment of removed wetlands in the immediate vicinity of the SR 520 corridor, as well as the transfer to the City of Seattle of an amount of green space either equivalent to or greater than the total to be forfeited for the project.

L-006-004 In addition to minimizing the permanent impact of any design alternative on parkland or wetlands in the project vicinity, WSDOT must provide citizens with as much access as possible to existing parkland and wetlands throughout the period of construction. Marsh Island, Foster Island, East Montlake Park, and the waterways surrounding these areas are some of the most heavily used green space in the City of Seattle, and it would be unacceptable to restrict access to these areas for a period of construction that could last for several years. The need to ensure continuous access to these recreation areas means that WSDOT must minimize or eliminate the use of parkland for temporary construction staging. WSDOT has indicated that East Montlake Park is one possible location for construction staging; however, given the already significant impacts to parkland throughout the SR 520 corridor to be created over the long run, WSDOT should remove from consideration construction staging that further limits access to existing recreational facilities in the short term.

L-006-005 Impacts of Construction

As the DEIS makes clear, the SR 520 Project will be a significant intrusion into various Seattle neighborhoods during the many years that construction will take place. However, the DEIS does not give appreciation to the extent of the negative impacts of construction, nor does it adequately explain how WSDOT will lessen these hardships on these communities. WSDOT needs to more thoroughly estimate in the final EIS the full consequences that construction will have on the quality of life in the impacted neighborhoods, and it should clarify how it will fully mitigate these negative impacts. In particular, WSDOT should reconsider or better address the following elements of construction, which are highlighted in the DEIS:

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L-006-006

- *Construction of Temporary Work Bridges.* Although the proposed temporary work bridges would enable WSDOT to rebuild SR 520 while maintaining the existing traffic capacity, these temporary work bridges would cause the SR 520 roadway to further intrude into surrounding neighborhoods and green space. WSDOT should provide an analysis of how long construction would last under scenarios that would narrow these work bridges or eliminate their utilization.

L-006-007

- *Closure of Lake Washington Boulevard Ramps.* The DEIS indicates that the Lake Washington Boulevard Ramps would be closed during construction for between three and five years. The closure of these access points to SR 520 would likely create an untenable level of congestion at the Montlake Boulevard interchange, which is already heavily congested during peak travel hours—as the DEIS clearly indicates. Further, the extra traffic forced through the Montlake Boulevard interchange would undoubtedly increase congestion on non-arterial streets throughout the Montlake area, as commuters facing increased congestion would attempt to bypass backups on the arterial roadways. Heavier traffic on non-arterial roads would in turn have unacceptable quality-of-life impacts on the residents of these neighborhoods and would likely have detrimental safety consequences. WSDOT should either allow the Lake Washington Boulevard Ramps to continue to operate until the new ramps are constructed, or clearly indicate how both negative safety and traffic flow effects in the local neighborhoods would be minimized in the case the ramps are closed.

L-006-008

- *Impacts on University Medical Center.* Should the 6-lane Pacific Interchange option be chosen as the preferred alternative, WSDOT should develop a detailed plan specifically for mitigating the impacts of construction on the University Medical Center. The DEIS states that, under this design alternative, Pacific Street Northeast between the Medical Center's emergency entrance and Montlake Boulevard would be closed for up to one year. WSDOT needs to clearly indicate how it would ensure direct access to the Medical Center throughout the period of construction. Further, the DEIS indicates that construction could result in undesirable dust and noise impacts in the vicinity of the Medical Center, possibly impacting the health of the Medical Center's patients. If the Pacific Interchange option is selected as the preferred alternative, WSDOT should indicate how it will ensure that construction will have zero environmental impacts on the Medical Center throughout construction, given the deleterious consequences these effects can have on Medical Center patients.

L-006-009

- *Use of Local Streets for Construction Hauling.* The DEIS indicates that many local arterial and non-arterial streets throughout the Montlake, Roanoke/Portage Bay, North Capital Hill, University District, and Eastlake neighborhoods will be used for construction hauling. WSDOT must clarify which segments of the streets it expects to use for construction hauling. Streets such as Newton Street East and 11th Avenue East extend through various neighborhoods, and the DEIS is not clear on which segments it is considering for construction hauling. Even with such a clarification, WSDOT must narrow the list of streets it will use for hauling construction materials. It appears that WSDOT intends to use almost every local street in the vicinity of the SR 520 corridor for

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email: richard.conlin@seattle.gov

L-006-009 construction hauling. However, many of the streets listed in the DEIS are entirely residential. Routing up to 12 trucks per hour over these streets—up to one truck every 5 minutes over the course of many years—will be overly intrusive.

L-006-010
- *Inclusion of Eastlake as an Impacted Community.* Concerning the use of local streets for construction hauling, WSDOT has proposed using Boylston Avenue East and Eastlake Avenue East to such ends. Parts or all of these streets are located in the Eastlake neighborhood, yet the Eastlake neighborhood is not included as an impacted community in the DEIS: WSDOT must either incorporate Eastlake as an impacted community if it proposes using streets in this neighborhood for construction hauling, or it should eliminate consideration of such streets for these purposes.

L-006-011
- *Access to Parkland.* The DEIS does not indicate the extent to which access to the Arboretum, East Montlake Park, or currently accessible green space will be curtailed, if at all. For example, the DEIS does not specify whether the heavily used Foster Island trail passing underneath SR 520 will be open or closed during construction. As indicated earlier in this letter, WSDOT must ensure access to these valuable recreational areas to the greatest extent possible throughout the period of construction.

L-006-012
- *Possible Nighttime Work Variances.* The DEIS states that WSDOT may seek nighttime work variances to speed construction. Although nighttime variances may be acceptable in rural areas or commercial zones, the SR 520 corridor runs through a largely residential zone of Seattle. Nighttime work would create unacceptable noise and light pollution for the surrounding neighborhoods. WSDOT should remove consideration of nighttime work as part of its construction planning.

L-006-013 Because the various construction issues highlighted above can impact the length of construction, for the SR 520 project WSDOT should follow the example set by the Supplementary Draft Environmental Impact Statement for the Alaska Way Viaduct and Seawall Replacement Project by outlining various construction options for the design alternative chosen for the final EIS. These construction options would demonstrate how varying methods of mitigating the impact of construction on the neighboring communities would affect the length of construction.

Thank you for your consideration of these comments. I look forward to continue working with the SR 520 Team as this project moves forward.

Sincerely,

Richard Conlin

Richard Conlin, Chair, SR 520 Committee of the Whole
Seattle City Council

An equal opportunity employer
600 Fourth Avenue, Floor 2, PO Box 34025, Seattle, Washington 98124-4025
Office: (206) 684-8805 Fax: (206) 684-8587 TTY: (206) 233-0025
email: richard.conlin@seattle.gov

RECEIVED
OCT 16 2006
WSDOT

RESOLUTION NO. 314

L-007-001

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MEDINA, WASHINGTON REGARDING A PREFERRED ALTERNATIVE AND ASSOCIATED OPTIONS FOR THE SR-520 BRIDGE REPLACEMENT AND HOV PROJECT

WHEREAS, the Washington State Transportation commission adopted resolution 596 of September 16, 1999, endorsing the Translake Washington Study Committee recommendations and directed the Washington State Department of Transportation (WSDOT) to proceed with an environmental impact study scoping effort focused on the SR-520 corridor and

WHEREAS, there is a desire by the State of Washington and the City of Medina to create an environment of cooperation and agreement in which agreement is reached relative to the design of a proposed SR-520 facility and related transportation improvements, and

WHEREAS, the Medina City Council by Resolution No. 270, dated December 13, 1999 and Position Statement, dated December 13, 2004, identifying community mitigation for any proposed SR-520 solution,

WHEREAS, any project within the SR-520 corridor must provide measurable congestion relief to the regional transportation system, and

WHEREAS, the City of Medina supports the SR-520 corridor Bridge Replacement and HOV Project to enhance regional transportation mobility and assure mitigation and enhancement of the SR-520 corridor in and through Medina and its adjacent communities, and

WHEREAS, the City of Medina would like to share its project recommendations and expectations with those also involved in identifying a preferred alternative for the SR-520 Bridge Replacement and HOV Project,

NOW, THEREFORE,

THE CITY COUNCIL OF THE CITY OF MEDINA, WASHINGTON, HEREBY RESOLVES AS FOLLOWS:

Section 1. The City of Medina supports the following project alternative and options:

L-007-001

A. 6 Lane Alternative (two general purpose lanes plus an HOV lanes in each direction) such that the project is constructed with pontoons sized to carry future high-capacity transit.
B. Construction of the eastside bicycle/pedestrian path along the north of the highway.
C. Retain the Evergreen Point freeway transit stop for current and future service.
D. Provide direct transit access at 108th Ave. NE to the S. Kirkland Park and Ride.

Section 2. The general project requirements for the SR-520 Bridge Replacement and HOV Project should include the following elements:

1. Lids
   - 3 Lids, 92nd Ave. NE; 84th Ave. NE; Evergreen Point Road
   - Maximum length possible not requiring mechanical ventilation or fire suppression – minimum 500' long.
   - Designed per community input for low intensity use and natural park-like appearance.

2. Sound Walls/ Noise
   - Continuous Sound Walls from the Eastside landing to Bellevue Way (except where lidded)
   - Design Sound Walls for maximum noise reduction benefit; cantilevered walls for uphill sound suppression.
   - Use of "Quiet Pavement" surface throughout Points communities.
   - Sound buffering within the lids to prevent "trumpeting the noise."

3. Transit Stops
   - Maintain Transit Stops at 92nd Ave. NE and Evergreen Point Road

4. Environmental
   - Avoid negative impacts to sensitive areas, including Nature Preserves. If avoidance is not possible, provide full mitigation

5. Construction Period
   - Minimize all construction impacts without unreasonably extending completion of construction.
   - Provide reasonable access for residents to their homes during construction.

6. General Design
   - Regional trail/bike path to be located on the north side for SR-520.
   - Provide owners of property identified for partial acquisition with option to sell entire property to WSDOT at fair market value.

L-007-001

- The object of any interchange modification is to minimize cut through traffic, carpool lane cheaters, and traffic back ups on local access routes.
- Equitable mitigation on both sides of the lake.

PASSED BY THE MEDINA CITY COUNCIL ON THE 9th DAY OF OCTOBER 2006, AND SIGNED IN AUTHENTICATION OF SUCH PASSAGE ON THE SAME DAY.

APPROVED:

Miles R. Adam

Miles R. Adam
Mayor

ATTEST/AUTHENTICATED:

Rachel Baker
City Clerk

Filed with the Clerk: 10/12/2006
Passed by the City Council: 10/9/2006
Resolution No. 314

Fax

Date: October 20, 2006

To: The Honorable Christine Gregoire
Governor, State of Washington
Fax No: (360) 753-4110

Douglas MacDonald
Washington State Secretary of Transportation
(360) 705-6800

John Milton
206·381·6442

From : Redmond Mayor Rosemarie Ives
Kirkland Mayor James L. Lauinger
Bellevue Mayor Grant Degginger
Clyde Hill Mayor George Martin
Medina Mayor Miles R. Adam
Yarrow Point Mayor David Cooper
Hunts Point Mayor Fred McConkey

Pages: 4 (including cover)

Re: SR 520 Corridor Bridge Replacement Improvements

cc: SR 520 Bridge Replacement & HOV Project Exec. Committee
Sally Jewell, UW Board of Regents

☐ **Urgent** ☐ **For Review** ☐ **Please Comment** ☐ **Please Reply** ☐ **Please Recycle**

•Comments:

October 20, 2006

The Honorable Christine Gregoire
Governor
State of Washington
PO Box 40002
Olympia, WA 98504-0400

Douglas B. MacDonald
Secretary
Washington State Department of Transportation
PO Box 47316
Olympia, WA 98504-7316

Dear Governor Gregoire and Secretary MacDonald:

L-008-001 As Mayors of the communities of Redmond, Kirkland, Bellevue, Clyde Hill, Medina, Yarrow Point and Hunts Point, we are pleased to provide you with the enclosed Joint Policy Interest Statement for the SR 520 Corridor and Bridge Replacement Improvements.

Our communities all support a comprehensive system of multi-modal transportation improvements for the Eastside. In summary, the interest statement lists the following options that we jointly support for the SR 520 Bridge and Corridor:

- A six-lane SR 520 Bridge Replacement and HOV option (two general purpose lanes and one new HOV lane in each direction);
- A system of freeway-to-freeway HOV connections at SR 520/I-5 and SR 520/I-405;
- Direct transit access at 108th Avenue NE, provided that existing regional bus service levels are not impaired;
- A SR 520 Bridge and Corridor designed and sized to incorporate high capacity transit (HCT), with adequate right-of-way to accommodate the required footprint of HCT and a re-constructed east high-rise that can structurally accommodate HCT;
- Retaining bus transit flyer stops between the SR 520 Bridge and I-405, as long as HCT can be accommodated in the future; and
- A bicycle/pedestrian path across the SR 520 Bridge and throughout the Corridor from I-5 to SR-202, providing a continuous, seamless bicycle/pedestrian path.

The 520 corridor is a critical component of the Puget Sound regional transportation network and it is time to move forward with the preferred alternative decision so that the State and Region can work in tandem to resolve the question of funding.

L-008-001 We applaud WSDOT for conducting a thorough and exhaustive analysis of the corridor over many years of study. In doing so, they have fulfilled their promise to listen to the issues and concerns of all interested parties.

In addition, we would like to thank you personally for your support for this project. Our communities on the Eastside are united in our vision for the new bridge and corridor, and we look forward to continuing to work with you to make this vision a reality in the near future.

Sincerely,

Rosemarie Ives
Mayor of Redmond

James L. Lauinger
Mayor of Kirkland

Grant Degginger
Mayor of Bellevue

George Martin
Mayor of Clyde Hill

Miles R. Adam
Mayor of Medina

David Cooper
Mayor of Yarrow Point

Fred McConkey
Mayor of Hunts Point

Enclosure: Redmond, Kirkland, Bellevue, Clyde Hill, Medina, Yarrow Point and Hunts Point SR 520 Corridor and Bridge Replacement Improvements Joint Policy Interest Statement

cc: SR 520 Bridge Replacement and HOV Project Executive Committee
Sally Jewell, Chair, University of Washington Board of Regents

L-008-001

SR 520 Corridor and Bridge Replacement Improvements

CITIES OF REDMOND, KIRKLAND, BELLEVUE, CLYDE HILL, MEDINA, YARROW POINT, & HUNTS POINT

POLICY INTEREST STATEMENT

October 2006

- The Cities of Redmond, Kirkland, Bellevue, Clyde Hill, Medina, Yarrow Point, and Hunts Point support multi-modal transportation solutions for the SR 520 Bridge and Corridor that include general purpose, HOV, high-capacity transit (HCT), bus transit and non-motorized improvements;

- SR 520 Bridge and Corridor improvements, construction phasing and funding must be coordinated with other regional transportation efforts underway, including development of Sound Transit Phase 2 and the Regional Transportation Improvement District investments, for a comprehensive system of multi-modal transportation improvements for the Eastside;

- The Cities of Redmond, Kirkland , Bellevue, Clyde Hill, Medina, Yarrow Point, and Hunts Point support the following options for the SR 520 Bridge and Corridor:

  - A 6-lane SR 520 Bridge Replacement and HOV option (two general purpose lanes and one new HOV lane in each direction)

  - A system of freeway-to-freeway HOV connections at SR 520/I-5, and SR 520/I-405

  - Direct transit access at 108th Avenue NE, provided that existing regional bus service levels are not impaired

  - A SR 520 Bridge and Corridor designed and sized to incorporate HCT, with adequate right-of-way to accommodate the required footprint of HCT and a re-constructed east high-rise that can structurally accommodate HCT

  - Retain bus transit flyer stops between the SR 520 Bridge and I-405 as long as HCT can be accommodated in the future

  - Bicycle/pedestrian path across the SR 520 Bridge and throughout the Corridor from I-5 to SR-202, providing a continuous, seamless bicycle/pedestrian path

- The Cities of Redmond, Kirkland, Bellevue, Clyde Hill, Medina, Yarrow Point, and Hunts Point encourage WSDOT, Sound Transit, the City of Seattle, the University of Washington and affected Seattle neighborhoods to reach agreement on design options and transit access that result in solutions that provide regional connections and enable the design and construction of the SR 520 Bridge and Corridor improvements to proceed without delay;

- The Cities of Redmond, Kirkland, Bellevue, Clyde Hill, Medina, Yarrow Point, and Hunts Point urge the WSDOT to meet the current schedule for SR 520 Bridge and Corridor improvements, with the Final EIS issued in 2007, a Record of Decision in 2008 and bid for construction in 2009;

- The Cities of Redmond, Kirkland, Bellevue, Clyde Hill, Medina, Yarrow Point, and Hunts Point are committed to working with WSDOT to minimize neighborhood impacts, including addressing Corridor bottlenecks and queuing of traffic onto local arterials;

- The Cities of Redmond, Kirkland, Bellevue, Clyde Hill, Medina, Yarrow Point, and Hunts Point will work with WSDOT to develop a construction mitigation plan that will minimize impacts to SR 520 users and affected neighborhoods; and

- The Cities of Redmond, Kirkland, Bellevue, Clyde Hill, Medina, Yarrow Point, and Hunts Point will actively assist in efforts to secure necessary funding for implementation of the SR 520 Bridge and Corridor improvements, and will continue to work together on planning for future HCT on the SR 520 Bridge.

King County
Office of Regional Transportation Planning
Department of Transportation
M.S. KSC-TR-0811
201 South Jackson Street
Seattle, WA 98104-3856

RECEIVED
NOV 03 2006
WSDOT

October 31, 2006

Paul Krueger
Environmental Manager
SR 520 Project Office
Washington State Department of Transportation
414 Olive Way, Suite 400
Seattle, WA 98101

Dear Mr. Krueger:

I am pleased to send you comments on the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement (DEIS). This project is sorely needed to prevent the loss of life and economic disruption that will occur if and when the existing SR 520 bridge sinks or is taken out of service due to its deteriorating condition. The project also promises substantial improvements to mobility and safety, while having the potential to mitigate the effects of the freeway on the communities it passes through.

These comments reflect the concerns of the King County Department of Transportation (KCDOT). Our primary comments reflect the potential benefits and impacts this project would have on transit services and customers, including vanpools, carpools, and Access paratransit riders; as well as mobility for pedestrians and bicyclists who use the corridor. Other King County departments may submit separate comments.

KCDOT offers the following comments, which are detailed further in the body of this letter:

L-009-001 1. KCDOT supports the six-lane alternative. High Occupancy Vehicle (HOV) lanes are needed to meet the project need as stated in the DEIS. HOV lanes should be a standard element of congested freeways with high transit use.

L-009-002 2. The Environmental Impact Statement (EIS) should show how project elements connect to other existing or planned improvements in the corridor, including HOV lanes, bicycle trails and freeway-to-freeway HOV ramps.

L-009-003 3. A ramp connection from SR 520 to the I-5 express lanes would have a strong benefit, but impacts of reducing the capacity of the express lanes should be assessed. Options to provide the ramp without reducing capacity of the express lanes should be considered.

MOBILITY FOR THE REGION

L-009-004

4. A Pacific Street interchange would save transit travel time, improve reliability and consolidate transferring at the Link Light Rail station; but more information is needed about how the intersection of the direct access ramp connection to the Union Bay Bridge would operate.

L-009-005

5. While the Montlake freeway station provides a substantial transit benefit, its functions could be replaced if three conditions are met:

   (1) the Pacific Street interchange is completed,

   (2) an eastside freeway station is retained, and

   (3) frequent bus service is provided between the University District and Redmond.

L-009-006

6. The design of the Montlake Triangle area will be critical if it is to function effectively for passengers and transit operations. Metro desires to be involved in a collaborative design process, and the final EIS should address how the proposed design will meet requirements of a multimodal transit transfer facility.

L-009-007

7. The 108th Avenue NE direct access ramp would also have substantial travel time savings for transit. The analysis showing it to have only a minor incremental benefit compared to the alternative to modify the loop ramp exit at Bellevue Way is counter-intuitive and probably does not include the travel time impact to buses of weaving across general traffic.

L-009-008

8. The design of freeway transit stations is critical and should be addressed further before the final EIS is published.

L-009-009

9. Closing the existing westbound HOV lane during construction should be avoided. If it is closed, an alternative route for transit should be provided. Projected incremental costs to transit operations due to construction should be calculated, and agreement about mitigation should be reached prior to publishing a record of decision.

L-009-010

10. A collaborative process should be used to develop a program of construction mitigation measures consistent with provisions of HB 2871. A full range of transit, demand management and passenger ferry options should be considered.

L-009-011

11. The impact of tolls on traffic performance should be assessed. The benefits and impacts of applying tolls as a traffic management tool should be assessed, including the option to apply tolls to both Lake Washington bridges. Facilities needed for toll and HOV enforcement should be assessed.

L-009-012

Thank you for producing a DEIS that is readable and understandable to the general public. The document is clear and comprehensive. Despite the volume of the documentation, the level of detail is not yet sufficient to comment on some location-specific design issues that could impact transit operation and safety at specific locations. We hope to participate in further discussion of

L-009-012 design issues beyond the level of detail discussed in the DEIS before those details are finalized. The following section provides a more detailed discussion of the previous general comments.

L-009-013 **1. Need For High Occupancy Vehicle (HOV) Lanes**

While the formal purpose for the project speaks only generically about improving mobility for people and goods across Lake Washington, the DEIS (page 1-5) states more directly that the project is needed because "SR 520 is congested and unreliable and does not encourage maximum transit and HOV use." Given that definition, it is difficult to see how the four-lane alternative meets the purpose and need for the project.

SR 520 is one of the few places in the region where large volumes of buses and other high occupancy vehicles have no priority over other vehicles through heavily congested freeway traffic. The Washington State Department of Transportation (WSDOT) committed in 1991 to an HOV Core Program that made HOV lanes a standard feature of freeways in the core of the Puget Sound region. SR 520 was excluded from the HOV Core Program because of the high cost of replacing the Evergreen Point Bridge. King County believes HOV lanes should be a standard element on Puget Sound freeways wherever heavy congestion and high transit use will co-exist.

L-009-014 The travel model used in preparation of the DEIS is now outdated in part because it projected unrealistically high transit mode shares for trips destined for downtown Seattle. It forecasts the share of transit trips on SR 520 will more than double even with the no action alternative which includes transit operating in mixed traffic. If the DEIS is updated to use a more current version of the regional travel model, the travel forecasts used for the SR 520 project would likely show a lower mode share for transit and, therefore, a higher level of traffic congestion on SR 520 in the future. If so, the need for HOV lanes would be even greater. Maintaining a reliable transit speed advantage is a prerequisite to maximize transit use and total corridor person throughput.

L-009-015 **2. Corridor Connectivity**

Because the eastern project limit is set just east of I-405, it is difficult to know what impact this project would have on the complete SR 520 corridor. Despite the project limits, the DEIS should describe how the project would fit with adjacent freeway segments to provide continuity for users of the eastern corridor.

For example, it is not clear whether the project provides for HOV lanes through the I-405 interchange to connect with relocated HOV lanes that currently end east of the interchange. In order to relocate the existing SR 520 HOV lanes from the outside lane of the freeway to the inside lane, will new lanes be necessary through the interchange to provide a continuous median-side lane from Redmond to Seattle? Will the roadway need to be widened through the interchange to accomplish that, and would that widening be dependent on funding for a separate I-405 project?

Once HOV lanes are moved to the median side throughout the corridor, buses will have to weave across traffic to make stops at the Northeast 40th Street freeway station to serve the Overlake

L-009-015 Transit Center and Northeast 40th Street park-and-ride lot. This will have an impact on the ability to operate service and removes some of the benefits of having an HOV lane in the area for buses. The EIS should identify the future need for direct access or an in-line freeway station at Northeast 40th Street that will result from moving the HOV lanes to the median side.

The need for freeway-to-freeway HOV connections between SR 520 and I-405 has been studied several times. These connections could be critical to transit routing decisions since transit cannot effectively use HOV lanes if buses need to weave to the outside lane to use general purpose exit ramps. The EIS should address how future freeway-to-freeway HOV connections included in the I-405 master plan will be accommodated by the project's design.

The project will add a bicycle lane that terminates east of I-405. It is not clear whether a connection will be provided with the existing SR 520 Bikeway Connection to Sammamish River Regional Trail following SR 520 between Northeast 24th Street and the West Lake Sammamish Parkway. Many bicyclists crossing the lake will be destined for employment or recreation sites located along SR 520 east of I-405, and the EIS should address how the project will allow them to make a continuous bicycle or walking trip along the SR 520 corridor.

L-009-016

3. I-5 Interchange

A reversible ramp connecting SR 520 to the I-5 express lanes has been long desired and would have a substantial benefit for transit. It would allow SR 520 bus trips operating into and out of Seattle to avoid congestion on the I-5 mainline and eliminate the need for buses to weave across dense I-5 traffic to get from the left-side southbound SR 520 to I-5 on-ramp to right-side I-5 downtown exits - a difficult movement to make with a 60 foot articulated bus. It could also allow buses to reach the Mercer Street corridor from SR 520 in the future if direct service is desired between the eastside and South Lake Union.

Previous studies such as the 1993 HOV Pre-Design Study have assumed this ramp would be added without reducing the number of lanes on the I-5 express lanes. The DEIS states that to accommodate this ramp the I-5 express lanes would be reduced from four lanes to three in the vicinity of the interchange (page 3-22). The traffic impacts of reducing the number of lanes on the I-5 express lanes are not presented in the DEIS. Since the express lanes carry a very high volume of transit riders, we would want to understand the tradeoffs involved before making a decision of this magnitude. We request all options be fully considered to add the ramp without removing a travel lane, such as by deviating freeway standards in the vicinity of the interchange.

L-009-017

4. Pacific Interchange

It is not clear how the intersection at the junction of the Union Bay Bridge and the ramps to and from SR 520 will operate. The diagrams show three closely-spaced intersections; two to accommodate general purpose ramp connections for a full-diamond interchange, and another between them where HOV traffic will enter and exit to and from the east. Will three signals be provided? How will HOV traffic be controlled to allow entering and exiting without being blocked by traffic queued at the general-purpose intersections?

L-009-018

5. Elimination of the Montlake Freeway Station

The Montlake freeway station allows eastside bus riders to use any of the many SR 520 routes to downtown Seattle to access the University of Washington (UW), and it allows Seattle residents to access SR 520 routes from downtown to eastside destinations. Because of the access it provides, the Montlake freeway station has the highest usage of any in the region despite being inaccessible to people with disabilities and an uncomfortable place to wait for a bus.

KCDOT participated in an SR 520 transit analysis sponsored by WSDOT in part to understand the impact of proposals to remove the Montlake freeway station and the steps needed to provide the same transit access in some other way. While we want to maintain the utility of the freeway station, we also understand the benefits that removing the freeway station would have on reducing the freeway footprint through the Montlake area when combined with the Pacific interchange option. We also see potential advantages in locating all transit transferring activity at the future Link station at the Montlake/Pacific intersection rather than having two transfer locations on each side of the Montlake Bridge, with no direct connection between SR 520 buses and Link Light Rail.

We believe the impact of removing the Montlake freeway station can be mitigated and the access it provides can be retained if three conditions are met:

(1) the Pacific Street interchange must be completed,

(2) a freeway station must be provided east of Lake Washington where transfers can be made between bus routes crossing SR 520, and

(3) a frequent all-day bus route must be provided between the University of Washington (UW) and Redmond. Seattle residents headed to the eastside could still access eastside services from local buses or Link Light Rail, and eastside residents could still board Seattle-bound buses to reach the University District by transferring at the remaining freeway station to the UW-Redmond route.

KCDOT considers this UW-Redmond bus route as a necessary mitigation if the Montlake freeway station is removed and feels it should be funded by the SR 520 project, at least during the construction period but preferably in perpetuity. A portion of the toll revenues could be set aside for this purpose on an ongoing basis. Agreement on funding for this service should be in place before the record of decision is issued for the project.

L-009-019

6. Montlake/Pacific Intersection and Connection to Link Light Rail

Especially if the Montlake freeway station is eliminated and the Pacific interchange option is chosen, the Montlake Triangle area will be a focus for transfers between buses, light rail trains, ACCESS paratransit vehicles and bicycles. This will also be a major transit access point from the University of Washington and its hospitals and the Husky Stadium high volume trip generators. More attention is needed in the EIS as to how these many functions will be

L-009-019 accommodated, the design improvements needed to minimize walk distances for passengers and to meet transit operating needs.

It is very important this area be designed to accommodate intermodal transfers effectively in order to minimize inconvenience and maximize safety for transferring passengers and to ensure this activity fits well with hospital and stadium access and other area activities. Once a preferred alternative has been selected, KCDOT would like to participate in interactive design sessions to improve on the current Montlake Triangle design to help it function more effectively as a transfer facility. The FEIS should address whether and how the design will effectively address transferring needs and identify which elements will be funded by the SR 520 Bridge Project, the UW, Sound Transit, the City of Seattle, King County or other parties.

Key factors critical to facilitating effective transfers include:

- minimizing the distance between bus bays, light rail platforms and bicycle storage locations,
- minimizing the need to cross traffic to make transfers,
- providing spaces where buses on routes terminating at the station can park between trips,
- maintaining a way for buses (including electric trolley buses) to turn around without delay,
- providing safe access to and from the Burke-Gilman trail,
- providing adequate bicycle storage,
- providing bus shelters, illumination and rain protection along walkways,
- considering space for ACCESS paratransit loading areas and an attended waiting area,
- providing space for a bus driver comfort station (bathroom), and
- maintaining transit priority measures through bottlenecks, such as on Pacific Street.

L-009-020 **7. 108th Avenue NE Interchange**

The Transportation Discipline Report Addendum shows (page 7-2) there is a very significant travel time saving for transit (16 minutes) that would use a direct access ramp at 108th Avenue NE compared with the base six-lane alternative. It also shows the modified loop ramp alternative would provide almost as great a travel time as the direct access ramp but with a lesser environmental impact. That finding is at odds with what we expect and probably excludes delays associated with weaving across freeway traffic to reach the right-side exit.

The direct access option provides an almost immediate connection between the freeway HOV lane and 108th Avenue NE, providing a direct route to the South Kirkland park-and-ride lot. In contrast, the modified loop ramp concept requires buses to weave across general purpose traffic to reach the Bellevue Way NE ramp, and then to travel on Bellevue Way and Northup Way to reach 108th Avenue NE. When congestion is present, buses will weave to the right lane in advance of the exit, foregoing the benefits of the HOV lane through the congested area. Please explain how this could possibly save as much time as the direct access alternative, since the reason is not intuitive. If our comment on page 1 about the model overestimating transit mode

L-009-020 share is correct and freeway traffic will be heavier than the forecast predicts, then the travel time cost of weaving across traffic will also be greater than predicted.

8. Freeway Stations

Freeway stations will need to be relocated to the median-side of the freeway to accommodate the six-lane alternative. All of the proposed freeway stations will be located under lids, so the environment will be similar to a subway. The design of these stations will be critical for them to be effective, safe, and comfortable places to wait for or transfer between bus services. KCDOT would like to review and comment on designs for these and other transit operating facilities before the design process reaches a point where important changes are no longer possible. The FEIS should address how the design will effectively address transit operation and capacity needs and what the passenger environment will be like in terms of noise levels, visibility, illumination, personal safety and exposure to emissions in the freeway environment. Access to these stations from trails and availability of bicycle storage should be addressed.

If transfers are anticipated between buses on the freeway and services on adjacent arterials, the proximity and design of arterial bus and paratransit facilities should also be addressed, including for disabled riders. WSDOT should evaluate design options that could allow vanpools to pick up and discharge passengers at freeway stations without interfering with transit operations.

L-009-021 **9. Construction Impacts on Transit**

It concerns us that the existing westbound HOV lane is being considered as a potential staging area and could be closed for up to two years. We do not believe closing the HOV lane during construction is an acceptable option. In that case, transit would be far less effective, with lower ridership and higher costs. The DEIS says two general purpose lanes will remain open during peak periods, but this suggests lane closures may occur during off-peak periods. We appreciate WSDOT's intent to work with us to find alternatives to closing the HOV lane, but if such solutions are not found, transit will be heavily impacted. The extra cost to Metro Transit to maintain service in this environment is not included in KCDOT's financial plans, especially if concurrent construction in other corridors will impact Metro's costs at the same time.

If reliable transit cannot be maintained on SR 520 during this period, trips to downtown Seattle may be rerouted to I-90. Since other traffic will also be rerouted adding congestion to I-405, this alternative will only be effective if transit priority is available on I-405, if buses can make the movement from I-405 to I-90 without crossing heavy traffic in Factoria, and if the I-90 R-8A HOV lanes have been completed. Potential solutions include allowing buses to use shoulders on I-405 through Bellevue, providing an opportunity to exit the HOV lane at Northeast 6th and re-enter the freeway south of Northeast 6th onto a shoulder HOV lane on the right side to I-90. All options should be explored to provide an alternative path during any HOV closure on SR 520.

Finding alternative routes for transit displaced from SR 520 requires solutions to be in place on several other corridors. Achieving this will require WSDOT to coordinate the transportation facilities and project staging on several projects to achieve a continuous transit pathway that can

L-009-021 continue to function during the period when the HOV lane is proposed to close. The FEIS should address the program management steps that will be taken to achieve this coordination.

This situation would occur within a context where transit is expected to play a significant role mitigating construction-related traffic congestion (see "Flexible Transportation Program and Construction Mitigation" section below). Providing transit service alone will not be sufficient to provide an effective mitigation. Transit service can only play a meaningful role in mitigating construction impacts if the right-of-way can be managed during construction to provide reliably fast transit service either in the corridor or in an alternative corridor that provides a similar travel time to riders.

The final EIS should identify how transit service will be affected during construction, and steps required for transit to play an effective role in mitigating construction-related traffic delays. Metro Transit Division's projected operating cost increases attributable to construction should be quantified, and if those costs cannot be avoided or minimized, the project should include funds to mitigate the incremental costs borne by Metro attributable to construction. Agreement on mitigation costs should be in place before a record of decision is issued.

L-009-022 **10. Flexible Transportation Program and Construction Mitigation**

Appendix A describes the Flexible Transportation Program (FTP), which sets aside a target of approximately one percent of the project total for Transportation Demand Management (TDM) purposes (estimated at $31M for the six-lane alternative) and commits "to facilitate a process that will bring together representatives from local jurisdictions and various other agencies to implement those elements of the FTP that would not be funded as part of project construction." KCDOT supports inclusion of TDM measures in the project budget and we look forward to working collaboratively to refine a flexible transportation program that will minimize single-occupant trips in the corridor.

We have several concerns about the program as described. While we appreciate that determining the "right" size of a TDM program is conceptually difficult, setting an arbitrary total may not be the best approach to sizing the program. There is significant data available on the effectiveness of different TDM measures and a body of literature on best practices that could be applied to determine how much TDM spending will be effective, and the point of diminishing returns for specific TDM actions. Metro Transit Division's Market Development staff can help provide information to support this process.

Three TDM elements are described: (1) administration and oversight, (2) marketing and public awareness programs, and (3) vanpool programs.

These may or may not be the most effective TDM measures to apply and documentation is missing to support the decision to focus on these elements. We believe the collaborative facilitated process described to refine the flexible transportation program should be well underway before a final program is described and costed in the final EIS, and that the full range of TDM, transit service pass subsidy options and the potential for passenger ferry service should

L-009-022 be open for discussion. A collaborative approach to developing corridor mitigation plans is part of recent legislation:

> "...operational expenses for traffic mitigation provided solely for transportation project construction mitigation directly related to specific projects as outlined in the plan shall be included in a regional transportation investment plan. Construction mitigation strategies may include, but are not limited to, funding for increased transit service hours, trip reduction incentives, non-motorized mode support, and ride-matching services." (House Bill 2871)

If a regional funding package is passed that provides funding for the SR 520 project, traffic will likely be impacted by congestion in multiple corridors concurrently. The mitigation program should address the cumulative impacts of these multiple projects. From a user's point of view, it is difficult to understand a TDM program focused on a single corridor, since many users travel in multiple corridors, and construction on multiple corridors will also impact other freeways that are not under construction. From an implementer's point of view, the cumulative impacts of mitigation programs in multiple corridors will determine whether the required fleet, base capacity and operating staff will be available, and whether resources can be moved from one area to another to adapt to changing construction conditions. For all of these reasons we believe a program of TDM and transit mitigation for freeway construction should be developed, assessed and implemented on a program basis rather than for each corridor separately.

The SR 520 corridor also provides an opportunity to consider TDM and transit support in the corridor on an ongoing basis once the project is completed. Toll revenues in the corridor will be collected in part to finance the project but also to help manage volumes to minimize congestion. In effect, tolling is one of several TDM strategies that could be applied to minimize single occupancy vehicle trips and maximize availability and use of alternative capacity. The use of toll revenues to support transit service and TDM as ongoing freeway management tools should be addressed in the final EIS.

L-009-023 **11. Tolling, Freeway Management and Enforcement**

While tolling is mentioned in the document, it is not clear whether the impact of tolling on travel behavior has been assessed. KCDOT supports active steps to manage transportation corridors, including use of dynamic tolling where rates vary based on congestion levels. The final EIS should discuss how tolling will be applied, and identify whether and how it will be used as a traffic management measure. The impacts on adjacent and parallel corridor traffic should also be assessed.

KCDOT believes consideration should be given to tolling both Lake Washington crossings to avoid having undue impacts on I-90 traffic while raising greater revenues for the SR 520 project

L-009-023 and for cross-lake transit service. The final EIS should assess the impacts and potential benefits of tolling both facilities.

L-009-024 To be effective and safe, both tolled roadways and HOV lanes require facilities and provisions for enforcement. The final EIS should address how enforcement will be done and the facilities needed to safely observe and enforce violations.

Thank you again for providing the opportunity to comment on the SR 520 Bridge Replacement and HOV Project DEIS. If you have questions or need further information relating to these comments, please contact Victor Obeso, Manager, Service Development, Metro Transit Division, KCDOT, at 206-263-3109.

Sincerely,

Harold S. Taniguchi
Director, King County Department of Transportation

cc: Laurie Brown, Deputy Director, KCDOT
Ron Posthuma, Assistant Director, KCDOT
Kevin Desmond, General Manager, Metro Transit Division (MTD), KCDOT
Victor Obeso, Manager, Service Development, MTD, KCDOT
Doug Hodson, Policy and Government Relations Liaison, KCDOT

Public Health
Seattle & King County

HEALTHY PEOPLE. HEALTHY COMMUNITIES.

Dorothy F. Teeter, MHA, *Interim Director and Health Officer*

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October 31, 2006

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

RE: SR 520 Bridge Replacement and HOV Project's Draft Environmental Impact Statement

Dear Mr. Krueger:

L-010-001 The need to replace the SR 520 Bridge has been established and safety is a primary concern. However, the appropriate mitigations should be developed for the environmental and community health impacts. Each environmental issue should be presented after each alternative. It is difficult when the environmental issues are separated by geography. All alternatives will have significant health impacts. The Environmental Health Division of Public Health – Seattle & King County does not recommend any particular alternative. However the Environmental Health Division is concerned about the following environmental quality issues that affect human health:

L-010-002 Noise Issues – Noise levels as defined in King County Code Chapter 12.88 are known to impact health. Noise levels and those noise levels should comply with the Seattle and Bellevue codes or be mitigated. The DEIS makes clear comparisons for the noise levels for all alternatives and demonstrates that every one but the no action alternative would improve or diminish noise levels. Such comparisons should also be made for air quality, water quality and ecological impacts.

L-010-003 Air quality Issues – Clean air is vital to the health of individuals and our community. Diminished air quality can exacerbate asthma and lung diseases. Therefore, air quality should at least remain the same and not decrease during bridge construction and use of a new bridge. Further, the Environmental Health Division suggests that there should be additional air monitoring before, during, and after construction. In King County, asthma is the second most common reason for children to be admitted to the hospital.

Environmental Health Services Division
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City of Seattle
Gregory J. Nickels, *Mayor*

King County
Ron Sims, *Executive*

Paul Kruger
October 30, 2006
Page 2

L-010-003 Air quality is diminished by toxics and particulates. Traffic exhaust contains toxic chemicals that include carbon monoxide, diesel particulate matter, benzene, 1, 3-butadiene, formaldehyde and polycyclic hydrocarbons. This project is in an EPA non attainment area for carbon monoxide. Traffic exhaust also contains suspended particles that are main ingredient of haze and airborne dust. Suspended particles, particularly particles less than 10 microns (PM-10) are a health hazard. This project is in an EPA non attainment area for PM-10. Therefore, contributions to greenhouse gasses and global warming need to be considered. Finally, the DEIS should make clear comparisons for air quality for each alternative as it has done for the noise levels.

L-010-004 Water Quality Issues - Water quality should at least remain the same or improve with the construction and use of a new bridge. Elements to consider in water quality include water quantity, stormwater, spill containment, and wetlands. Water quality and water quantity are inseparable. Any increase in impervious surfaces increases the quantity of stormwater. Therefore, appropriately sized containment is essential. Stormwater calculations should be provided for each option. Retention facilities should be discussed. Diagrams of stormwater discharge areas should be provided and current flows should be compared with any changes. The ability of the containment wetlands to handle heavy metals and other toxics should be monitored. Toxic spill response also requires appropriate and appropriately sized containment. Wetlands may not be the appropriate containment for spills. Spill containment, treatment and removal of spilled materials should be discussed. As wetlands need to be replaced, they should be replaced one for one, with at least the same degree of quality wetlands being removed. Wetlands that are shaded should also be replaced one for one. The DEIS should make clear comparisons about water quality for each alternative as it has for noise levels.

L-010-005

L-010-006 Ecological Issues -- A healthy ecosystem is inseparable from human health because humans are part of the ecosystem and because diminishment of ecosystems is strongly linked to psychological conditions as well as unsustainable economic conditions. As John Muir said "Tug on anything at all and you'll find it connected to everything else in the universe." There should be an inventory of all the plant and animal populations, interactions and behavior patterns. Mitigations should be made in light of this ecological assessment.

L-010-007 There should be a net gain in vegetation, especially trees, based on the inventories noted above. Currently, all construction alternatives propose to remove trees.

L-010-007 However, vegetation will help clean the air for all. Older vegetation is able to clean air better than newer so there should be a net gain in plants. Additionally, the Arboretum collections should receive special attention, based on expert opinion, to assure that there is no loss to the Arboretum and therefore, to the community.

L-010-008 There should be no net loss in wildlife and fish based on the inventories noted above. Further, there should be no disruption in habitat migration and breeding areas. The DEIS should make clear comparisons for the ecological impacts between alternative proposals as has been done for noise levels.

L-010-009 Prioritize public transit - All alternatives should have a strong transit-focus. Each alternative needs to be strongly associated with promoting modes of transportation other than single-occupancy vehicles. Comparisons of impacts to transit should be made.

L-010-010 Bicycle and pedestrian safety and health - Pedestrian safety and bicycle safety must be protected. Biking and walking are legitimate forms of transportation and they provide physical activity which Public Health promotes. The public health goal is to improve health, fitness, and quality of life through daily physical activity and environmental protection. This is being accomplished by promoting activities that already exist, by partnering with other community efforts, and by developing new resources and improving access to existing resources through the efforts of organizations such as the King County Physical Activity Coalition and other Public Health programs. Therefore, it is important that bicycling and walking options are prioritized and carefully planned.

L-010-011 Finally, Public Health – Seattle and King County suggests that a Health Impact Assessment be conducted 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" (1999 Gothenburg consensus statement, www.who.dk/document/PAE/Gothenburgpaper.pdf). Further information can be found at http://www.cdc.gov/healthyplaces/hia.htm or by contacting Anne Bikle at anne.bikle@metrokc.gov or 206 296 4794.

Thank you for the opportunity to comment on the Washington State's Department of Transportation's SR 520 Bridge Replacement and HOV Project's Draft Environmental Impact Statement.

Sincerely,

Ngozi T. Oleru, Ph.D., Director
Environmental Health Services Division
Public Health – Seattle & King County

NTO:dm

cc: Dorothy Teeter, MHA, Interim Director and Health Officer, Public Health – Seattle & King County, (PHSKC)
Greg Kipp, Chief Administrative Officer, PHSKC
Anne Bikle, Environmental Health Public Health Planner, PHSKC
Lee Dorigan, Supervisor, Special Projects, PHSKC

From:	Layne Cubell
To:	SR 520 DEIS Comments;
CC:	Karen Kiest; Guillermo Romano; Tom Iurino;
Subject:	Seattle Design Commission letter
Date:	Tuesday, October 31, 2006 4:30:27 PM
Attachments:	DC SR520 DEIS Final 103106.pdf

Dear Mr. Krueger,

On behalf of the Seattle Design Commission, attached please find a comment letter on the SR-520 Bridge Replacement and HOV Project DEIS. We'll be sending a copy to you by US mail, as well, and to all parties copied on the letter via a separate email.

Sincerely,

Layne Cubell
Seattle Design Commission
City of Seattle
700 Fifth Avenue, Suite 2000
P.O. Box 34019
Seattle, WA 98124-4019
(206) 233-7911

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Seattle
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Commission

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Mayor

Karen Kiest
Chair

Tasha Atchison

Pam Beyette

Evan Bourquard

Brendan Connolly

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October 31, 2006

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

RE: Response to the Draft Environmental Impact Statement for the SR-520 Bridge Replacement and HOV Project

Dear Mr. Krueger:

The Seattle Design Commission appreciates the open and collaborative approach that WSDOT has taken on this project, applauds its strong cooperation with the City of Seattle to identify and address the local impacts that will result from this most significant project and takes seriously our charge to advise the City on its long term interests.

We have conducted a series of reviews of the SR-520 project in seven courtesy briefings over the past four years. Our comments on the DEIS are based on the formal actions that we took at those meetings. Our review of the DEIS document concentrates on the urban design implications for the City of Seattle contained in Section 5, "Detailed Comparison of Alternatives-Seattle", but we have also given a cursory look to other sections and also to Appendix S: Visual Quality and Aesthetics.

Key Recommendations:

L-011-001

- We feel strongly that new project cost estimates released last month by WSDOT must be clearly identified for each alternative and must factor into your own decision making. We think it is best to analyze the alternatives with this in mind as public funds are a finite resource. It is unrealistic to think that all of the mitigation measures will be funded.

L-011-002

- The final EIS needs to reframe the alternatives to allow a fair comparison between the 4-lane and 6-lane alternatives. Added amenities to mitigate environmental impacts are not included in the 4-lane alternative as they are in the 6-lane options. This is a real shortcoming of the DEIS. Given the budget challenges of the project and the likely need for severe value engineering, we think that all the options need to be evaluated on an even footing.

L-011-003

- It is clear from the available information that the physical impacts on Seattle of any 6-lane option will be far greater than those of the 4-Lane Alternative. Therefore, we cannot support the 6-lane options presented as we remain solid in our concerns for: impacts on the University of Washington; impacts on the Arboretum and area wetlands; impacts to Seattle neighborhoods; and inherent conflicts with Seattle's global reputation as an environmental policy leader.

L-011-004

- The Preferred Alternative for SR-520 must duly consider the changing and highly integrated mix of land uses along the Seattle corridor. The DEIS examines impacts with existing uses only and overlooks planned future uses. Special consideration must be given to the UW's Long Term Physical Development Plan, the Arboretum's Master Plan, and Sound Transit's plans for the new Stadium Station.

L-011-005

- While we understand that the study is looking at selected options, the best mobility and urban design solutions might be found in a hybrid alternative that pulls together the fundamental merit of the 4-lane Alternative and the added benefits of the several 6-lane options. We hope that this type of resolution is not excluded in this process. Specifically, we recommend that any such alternative include: dedicated transit ramps at key junctures; lids that offer improved surface connections; a direct intermodal transportation connection at the University; and aggressive traffic management and congestion pricing tools. This alternative might also investigate depressing, stacking or layering the corridor through parts of Montlake and Portage Bay to minimize the roadway width.

Mobility - Vehicles, Transit, Bicycles and Pedestrians

L-011-006

- It seems to us that the goal of the project should be to increase overall mobility with the least environmental impact possible. While various aspects of the transportation system are studied in the DEIS, it is not easy to understand the mobility impacts of each alternative. Although much of the information is embedded in the DEIS it needs to be compiled and reorganized so it may be compared in a clearer way.

L-011-007

- The Sound Transit Light Rail project represents the region's largest investment in rapid mass transit and the first phase of the project will terminate just to the north of SR-520. Regardless of which alternative is selected, we think it is critical that a direct connection between the two projects be made. The Pacific Interchange option offers the best such connection, but it is not clear how bus/train transfers will be accommodated in a very busy and complex intersection. A concerted planning effort for a true multi-modal transit center needs to drive the Pacific Interchange scheme or any scheme that promotes improved intermodal connections.

L-011-008

- For optimal mobility, the highway infrastructure must work well as a system of connected roadways. I-5 has insufficient highway capacity to effectively handle 520 traffic flows with either of the 6-lane options. Improvements to this critical connection point must be articulated in the FEIS.

L-011-009

- It appears that all alternatives make huge improvements to cross-lake bicycle and pedestrian mobility, which we applaud. Similarly, it appears that north-south bicycle and pedestrian access is improved with all alternatives, however it is not clear in the DEIS how connections are made to the larger existing pedestrian and bicycle network in the city. This point is critical and needs to be expanded in the FEIS.

Noise

L-011-010

- Lids themselves, if well designed, could work effectively to mitigate noise. The I-90 lid over Mercer Island offers a good example. The noise impacts of the 4-lane alternative appear the greatest, but it is evaluated without lids. The FEIS should compare how the 4-lane alternative and 6-lane options work with the same type of lids in place and then both should be evaluated without lids, as well.

- Sound walls need to be assessed for optimal location based on noise impacts and community desire. In some cases, they may not be the optimal solution.

Visual Quality

L-011-011

- We applaud the effort to look at aesthetics early on and commend the Corridor Aesthetics Handbook recently released. The Commission is most concerned with how the good thinking in this handbook gets applied to the actual design of the project. The recommendations contained in the handbook should be reinforced in the FEIS.

L-011-012

- Sound walls should be used sparingly and need to be approached more aesthetically as design elements of the overall corridor. Their height, form and materials need to be refined from the early computer engineered images shown in the DEIS.

L-011-013

- Exhibits 5-1 through 5-4 give a very good comparison of the visual impacts of the alternatives and options viewed from the Arboretum and Portage Bay. Given the current visual impact of SR-520 on the North Capitol Hill and Roanoke neighborhoods, similar visual simulations of the alternatives and options for those neighborhoods need to be included in the FEIS, as well. More attention should be given to views looking west along the corridor in this area.

L-011-014

- We think the FEIS needs to more fully explore all options through visual simulation videos, much like the Viaduct project has recently done. These will be important to fully assess the impact on adjacent neighborhoods and should include realistic lighting, landscaping and signage conditions.

Environment and Recreation

L-011-015

- The scale of both the over-water and over-wetland coverage through the north end of the Arboretum and Portage Bay for both 6-Lane options are of great concern because of the impacts on environmental habitat. Soils, water quality, shoreline vegetation and aquatic life all must be fully assessed and to the extent possible, loss of habitat must be mitigated.

L-011-016

- Also of great concern are the impacts on recreation sites. These same areas offer important walking, running and non-motorized boating access for citizens of the city. While both 6-lane options show significant impacts, the Pacific Interchange Option also impacts the UW Waterfront Activities Center. The spreadsheet shown in Exhibit 5-14 seems like an inadequate investigation of the physical, visual and noise impacts on nearby recreation areas.

L-011-017

- The DEIS indicates that all alternatives would decrease vehicle emissions because of improved mobility and increased travel speeds. This is admirable, given Seattle's (and Redmond's) commitment to reducing greenhouse gases through the Mayor's Climate Protection Agreement (MCPA). There are obvious positive impacts on the quality of life in the city if emissions are reduced. However, the projected reductions appear minimal and nowhere close to the goals of the MCPA. The FEIS needs to quantify the effect of each option on cumulative emissions throughout the city, not just within the corridor. If more vehicles are entering the city street grid what are the overall emissions impacts? Are there any ways in which the project could be modified to come closer to meeting the MCPA?

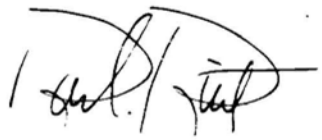
L-011-018

Summary

We fully recognize the need for compromise on this major regional transportation project. The Pacific Interchange option has generated a lot of media attention lately and certainly has its merits, but we remain concerned about its impacts and instead recommend honing a 4-Lane hybrid option that more fully meets the needs of Seattle's citizens.

We thank WSDOT for their willingness to work with the Seattle Design Commission and appreciate the legibility of the DEIS document. We look forward to continuing to work with WSDOT as this critical project moves from preliminary engineering through design and into construction.

Sincerely,



Karen Kiest
Chair

cc: Secretary Doug McDonald, WSDOT
Mayor Greg Nickels
Tim Ceis and Emelie East, Seattle Mayor's Office
Seattle City Council
Michael Fong and Casey Hanewall, Seattle City Council Central Staff
Grace Crunican, Bob Powers, Dave Allen, SDOT
Diane Sugimura and John Rahaim, DPD
Ken Bounds, Erin Devoto, Kevin Stoops, David Graves, Seattle Parks
Barb Wilson and Jerry Finrow, Seattle Planning Commission