April 15, 2010

Governor Christine Gregoire
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

Paula Hammond, Secretary
Washington State Department of Transportation
Transportation Building
501 Maple Park Avenue SE
PO Box 47300
Olympia, WA 98504-7300

Jenifer Young
SDEIS Environmental Manager
600 Stewart St., Suite 520
Seattle, WA 98101

Dear Governor Gregoire, Secretary Hammond, and Ms. Young:

Thank you for the opportunity for to provide comments and recommendations on the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. We appreciate the support you have given to our involvement, and the structure of the work groups that were created in ESSB 6392. This letter communicates our perspective as we move into the next stage of cooperative efforts involving the State, the region, and the City of Seattle.

Our comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project fall into four categories:

1) An overview of our policy approach to the project in this cover letter.
2) A set of formal recommendations for the SDEIS (Attachment 1) to improve the project, particularly in the Westside interchange area.
3) Additional recommendations for the SDEIS that include phasing the decisions relating to the construction of two specific project components (Attachment 2). The two components are the second Montlake Bridge and the 24th Avenue (Lake Washington Boulevard) ramps.
4) An additional recommendation for a future project to be analyzed (Attachment 3).

We are committed to moving this project forward towards a 2014 opening for the new bridge and to keeping the project within the projected $4.65 billion budget. We support the vision of the project as a six lane corridor between Medina and I-5 that includes two dedicated high occupancy vehicle (HOV)/transit lanes. Dedicated HOV/transit lanes will immediately improve transit in the corridor and are consistent with the state legislative requirement "to accommodate light rail in the future".
The project should be designed and constructed to be ready for conversion from HOV/transit to Bus Rapid Transit (BRT), with a clear and legislatively mandated performance standard for increasing the minimum number of passengers per vehicle in HOV lanes and ultimately the conversion of the HOV/transit lanes to dedicated BRT, as envisioned in the SR 520 High Capacity Transit Plan. Such a performance standard has already been articulated in ESSB 6392, but it is an imperative that the Legislature and Governor take this standard to a level of certainty by adopting additional legislation requiring that action will be taken when appropriate thresholds are reached. It is also critical that the state identify committed revenue to fund transit for the SR 520 corridor.

As we noted in our January 28 letter, “neither Alternative A+ nor M adequately meets the needs and priorities of the City of Seattle and our residents.” We oppose designating Alternative A+ as the Preferred Alternative for this project, and recommend that the state identify a new alternative that includes our design alternatives.

The relatively short comment period for the SDEIS precludes the possibility of a full exploration of all possible design options and refinements for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. If accepted by WSDOT, some of the recommendations included in this letter will also require additional design work in order to determine the scale of their potential impacts and costs. Although WSDOT intends to identify a preferred design alternative for the SR 520 Bridge by April 30, 2010, it is our sincere hope that, in the weeks and months ahead, WSDOT will continue to work with the City of Seattle, Metro, ST, and UW as they refine and finalize their plans and prepare to issue a final EIS in late 2010.

Thank you for considering our comments. As the SR 520, I-5 to Medina: Bridge Replacement and HOV Project continues to move forward, we look forward to working in partnership with you to ensure the final design for the corridor is sensitive to the needs of the Seattle communities that surround it.

Sincerely,

[Signatures]

Council President Richard Conlin
Councilmember Sally Bagshaw
Councilmember Tim Burgess
Councilmember Jean Godden
Councilmember Nick Licata
Councilmember Tom Rasmussen
Councilmember Sally J Clark
Councilmember Bruce Harrell
Councilmember Mike O’ Brien
ATTACHMENT 1: COMMENT LETTER FOR THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)

Following the Washington State Department of Transportation's (WSDOT) release of the SDEIS in January 2010, the Seattle City Council initiated a two month review and assessment process that was intended to inform the content of this letter. As part of that effort, we hired transportation consultants from Nelson\Nygaard and also worked closely with the Seattle Department of Transportation (SDOT), WSDOT, Sound Transit (ST), King County Metro (Metro), and the University of Washington (UW). Our key goals for the review and assessment process were to develop specific design recommendations for the new SR 520 Bridge that would help improve transit service and connectivity, the pedestrian and bicycle environment, neighborhoods, traffic operations, and open space in the vicinity of the corridor. We also identified the following four assumptions to help guide the development of any new design elements and/or system-level alternatives that might emerge from our SDEIS review process:

1) Between Medina and I-5, SR 520 will have a total of six travel lanes, including four general purpose lanes (two in each direction) and two high occupancy vehicle (HOV) or transit lanes (one in each direction);

2) The total budget for SR 520 corridor improvements, including mitigation, will not exceed $4.65 billion;

3) No additional environmental impact assessments, including the publication of an additional SDEIS, will be necessary; and

4) The design alternatives evaluated as part of this process will generally be within the scope of either the DEIS or SDEIS that WSDOT has already completed for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project.

We believe that most of the recommendations included in this letter are substantially within the framework and intent of these baseline assumptions. Each of our recommendations is designed to significantly improve the portion of the SR 520 corridor that extends through the City of Seattle. Consistent with the ongoing design refinement process described in ESSB 6392, we would welcome an opportunity to continue working with the State to analyze the potential outcomes of the policy and design options we are supporting in this letter.

Our recommendations are as follows:

Design Recommendations

- **Construct the replacement corridor in a six-lane configuration.**
  We reaffirm our position that the replacement corridor should be designed to accommodate no more than six lanes of traffic, including two lanes for transit and HOV and four lanes for general purpose traffic.

- **Locate Westside interchange at Montlake, with conditions.**
  More than 50 percent of the current daily traffic on SR 520 uses the existing Montlake interchange. The interchange, which is located just south of the Montlake Cut, offers convenient access to several institutions and amenities that draw visitors and employees from across the region, including UW and the Washington Park Arboretum. However, the interchange is also sited in the heart of Seattle’s historic Montlake neighborhood, where it abuts the community’s commercial district on 24th Avenue East. If a new, replacement interchange is to be sited in Montlake, the following elements should be incorporated into its design:

  1) The interchange must be redesigned to reduce the overall footprint, to be more compatible with the Montlake community, scaled to its location within a neighborhood, and organized to promote the most effective pedestrian, bicycle, and transit connections. We request that continued collaboration occur between WSDOT, SDOT, and if appropriate, consultants to redesign the interchange to operate as an urban intersection, not a
highway interchange. Options for a redesigned interchange should include a tightened intersection, a diverging diamond configuration, and loop ramps under the east end of the Portage Bay Bridge.

Ramp intersections should also be tightened and slip ramps eliminated. These design refinements will help to improve bicycle and pedestrian safety along Montlake Boulevard and support creating an interchange that is more suitable for a neighborhood setting like Montlake.

2) New HOV/transit-only ramps should be located at 24th Avenue East rather than at Montlake Boulevard. Placing the HOV/transit-only ramps at 24th Avenue East would require buses and carpools traveling between SR 520 and the UW and Montlake areas to drive about two blocks farther in order to utilize a direct access ramp. However, locating the HOV/transit-only ramps at 24th Avenue East would create an opportunity to construct a large lid over SR 520, between Montlake Boulevard and 24th Avenue East that would not be bisected by any vehicle lanes.

3) A new lid over SR 520, between Montlake Boulevard and 24th Avenue East, would create a buffer between the Montlake neighborhood and SR 520. It would also enhance the bicycle and pedestrian environment on Montlake Boulevard. Bus stops should be included on this lid.

4) Priority signals for transit should be provided at key intersections in the vicinity of the Montlake interchange. These include the intersection of Northeast Pacific Street and Montlake Boulevard, and intersection at the north end of the Montlake interchange. This form of signalization, also referred to as a "queue jump," would allow buses to clear busy intersections before other traffic is allowed to move.

5) Dedicated HOV/transit lanes should be provided on Montlake Boulevard. At a minimum, these lanes should extend from the intersection of Northeast Pacific Street and Montlake Boulevard to the intersection of 23rd Avenue and Lake Washington Boulevard.

6) WSDOT should also commit to working with SDOT to consider extending the dedicated HOV/transit lanes on Montlake Boulevard to the north, and on 23rd Avenue to the south. The southern corridor should be reviewed as far as the intersection of Madison and 23rd Avenues.

7) The High Capacity Transit Plan for SR 520 lacks specificity with regard to service availability, particularly midday, over the phase-in of new transit service on SR 520. WSDOT should work with Metro and ST to ensure that there will be an adequate base level of mid-day service between the UW/Montlake area and the Eastside when the current flyer stop is closed. A specific transit service plan for the ramp up to and duration of construction of the corridor should also be developed. A reduction in frequent and reliable service is unacceptable. WSDOT is heavily dependent upon the implementation of new transit service in order to meet the corridor's purpose of improving mobility for people across Lake Washington. As a result, we believe more specific commitments to transit service investments need to be sought from Metro and ST.

8) WSDOT should set a goal of identifying design alternatives that would reduce the number of general purpose lanes exiting westbound SR 520 at Montlake Boulevard from two to one.

- **Direct project mitigation funds to the Montlake Triangle area.**
  The Montlake Triangle, at the intersection of Montlake Boulevard and Northeast Pacific Street, is a heavily traveled area that will be significantly impacted by the replacement and expansion of the SR 520 corridor. As such, the Montlake Triangle, which is a major pedestrian and transit hub and will soon be home to the U-Link light rail station, should be a strong candidate for project mitigation funds. Consistent with ESSB 6392, we also look forward to convening a work group to study and make recommendations about transit connections in this area. One of the Council's primary goals for this work is to identify ways to reduce the walking distances between all the transit modes that will serve the Montlake Triangle into the future and to improve the pedestrian environment in this area.
• **Minimize the height of the cross-lake bridge deck.**
  The SDEIS considers a 32-foot high bridge deck on the cross-lake, floating portion of the SR 520 Bridge. At more than 20 feet higher than the existing bridge deck, 32 feet is unacceptable. A bridge height of 32 feet would have significant, negative visual impacts and degrade important scenic and historic viewsheds from the Washington Park Arboretum, UW, and along Lake Washington Boulevard. We recommend that the height of the replacement bridge deck be lowered to as close to 20 feet as possible without compromising the safety of the corridor.

• **Split the bridge corridor and narrow shoulders through the Arboretum.**
  To minimize impacts on the Arboretum and provide for the daylighting of the area underneath the bridge, the eastbound and westbound lanes on SR 520 should be split through Foster Island and as much of the Arboretum as possible. This design modification is important to ensure that the corridor can accommodate light rail in the future. The gap should be as wide as feasible without interfering with traditional cultural property. The amount of pavement should be reduced by narrowing the shoulder width by two feet on each side of both eastbound and westbound lanes, for a total pavement reduction of 8 feet through the Arboretum.

• **Reduce the width of the Portage Bay Bridge.**
  In the SDEIS, Option A+ calls for a seven lane configuration across Portage Bay from Montlake to I-5. This configuration includes four general purpose lanes, two HOV/transit lanes, and one westbound auxiliary lane. We support eliminating the auxiliary lane and replacing it with a managed shoulder that could be used as a traffic lane during peak travel times. Adoption of this concept could reduce the footprint of the Portage Bay Bridge.

• **Ensure that the new bridge is designed and constructed to accommodate high capacity transit.**
  In 2008, average weekday transit ridership on the SR 520 Bridge was about 15,000. By 2020, that figure is expected to increase to 25,000 daily riders. As the demand for transit service along the SR 520 corridor continues to climb, the new bridge should be designed and constructed in a manner that will accommodate appropriate new modes of high capacity transit, including dedicated BRT and/or light rail.

  With regard to accommodating light rail along the SR 520 corridor, we support maintaining flexibility for the region to make this decision at a later date. We also encourage WSDOT, ST, and the Federal Highway Administration (FHWA) to evaluate the potential for a future cross-section for the floating bridge that could accommodate four lanes of vehicular traffic (two in each direction), two lanes of light rail (one in each direction), and a bicycle and pedestrian pathway within a 115-foot wide right of way.

  A report by Nelson/Mynaard that was commissioned by the Seattle Mayor’s Office identified three possible issues that could compromise the ability of SR 520 to accommodate future light rail:

  1) A gap between the eastbound and westbound lanes on SR 520 would need to extend through the Arboretum in order to allow light rail. The Council has already recommended this gap and we endorse this element, which could be included under the current SDEIS and without delaying the project.
  2) The roadway on the bridge deck would have to be expanded to 125 feet in order to allow for light rail. The Council and the neighborhoods adjacent to SR 520 have worked for years to narrow the bridge design to minimize its footprint and impacts and to minimize the possibility of restriping the bridge for additional vehicle lanes. We note that light rail is being added to the I-90 corridor through design modifications with the approval of FHWA, WSDOT and ST that allow for narrower shoulders than the cross section of SR 520 in the Mayor’s report. Given this precedent, as well as information from WSDOT that adding additional width would be feasible if desired, the Council does not support widening the bridge deck to 125 feet at this time. It appears that the current floating bridge design with the addition of the split corridor design modification would be compatible with light rail. The Council is committed to minimizing the footprint and avoiding significant delay of the project.
3) Additional pontoons would be required to support the weight of light rail on the bridge. WSDOT has indicated that the design would support the additional pontoons and that there are no technical reasons that require adding them at the current time. Adding pontoons now would require additional environmental work and delay the project. Given that the region has not decided to construct light rail on the corridor, it would not be an appropriate use of limited public funds to include the pontoons in the current project or delay the project to complete the required environmental analysis.

There is no current plan for light rail on this corridor. That option was deferred by the ST Board through the ST planning process. The ballot measure that passed in November 2008 includes significant increases in funding for bus operations on the SR 520 corridor. Additionally, the Lake Washington Urban Partnership is funding the capital costs for 45 new buses dedicated to this corridor and Metro is dedicating funding for expansion of bus service. Buses may provide a more flexible and effective form of high capacity transit for this project area.

If the region were to proceed with light rail on the SR 520 corridor, there would have to be additional environmental assessment, routes determined for light rail to traverse after leaving the corridor, a funding plan approved by voters, and design and engineering work.

We therefore recommend that the design for the SR 520 corridor accomplish the following in order to meet the legislative requirement to accommodate light rail:

1) Ensure that no substantial element of the corridor, such as overpasses or highway portions, would have to be demolished and rebuilt in order to construct light rail.
2) Include the recommended gap between the eastbound and westbound lanes in the Arboretum area.
3) Have a design plan that includes light rail on the current 115-foot wide bridge corridor and/or that permits adding additional width without demolishing or rebuilding the bridge deck.
4) Ensure that the pontoons are designed so that the additional stabilization pontoons can be added without major disruption of the corridor or significant modification of the existing pontoons.

- **Enhance the streetscape along Montlake Boulevard and in the vicinity of the Montlake interchange.**
  Montlake Boulevard is a heavily traveled arterial that is also an important corridor for pedestrians and bicyclists. Improving lighting, signage, landscaping, and bicycle and pedestrian facilities along Montlake Boulevard and in the vicinity of the Montlake interchange would help to make this area more "human scale" and enhance its safety for those who are traveling by foot or by bike. This area should be designed in accordance with the Olmsted plan for Montlake Boulevard and Montlake Boulevard should have a fully landscaped median.

- **Design bicycle and pedestrian facilities along the SR 520 corridor to City of Seattle standards at all locations.**
  The planned bicycle and pedestrian route along the SR 520 corridor, from Seattle to Medina, is an important component of the design for the new bridge. This new facility will expand recreational and commuting opportunities for residents on both sides of Lake Washington and complete a critical link in our region's expanding network of bicycle and pedestrian paths. New connections on Montlake Boulevard, connections west of Montlake Boulevard to the Montlake Playfield and bicycle corridors to Capitol Hill, and connections north of the Montlake Boulevard/Pacific Street intersection to the Burke Gilman Trail and the University of Washington should include minimum widths of 16 feet for major pedestrian routes and 12 feet for major bicycle routes. Design modifications should be identified, if needed, for these routes.

- **Develop a noise mitigation plan for SR 520 in partnership with nearby residents.**
  We fully support WSDOT's plans to develop a noise mitigation plan for SR 520. Residents of the neighborhoods adjacent to the corridor should have an opportunity to participate in this planning process. In addition to federally recognized noise mitigation measures, the plan should include new and innovative practices that have the potential to effectively reduce noise impacts. We also encourage WSDOT to fully
implement the recommendations from the Health Impact Assessment that was completed for SR 520 in 2008 by Seattle-King County Public Health and the Puget Sound Clean Air Agency.

- **Review and improve plans for managing the impacts of construction in the new SR 520 corridor in partnership with nearby residents, institutions, and businesses.**
  The impacts of construction, including truck traffic, will be significant in neighborhoods around the 520 corridor. WSDOT should carefully review the construction management plan for SR 520 and coordinate with the agencies that are managing other nearby projects (such as University Link) to minimize impacts.

**Policy Recommendations**

- **Develop and implement a corridor management plan that includes minimum performance standards for transit/HOV and general purposes lanes with triggers for mandatory actions to maintain those standards.**
  Consistent with ESSB 6392, we concur that WSDOT should develop performance standards for the HOV/transit lanes on SR 520. We recommend that WSDOT develop a corridor management plan, to be adopted by the Legislature and approved by the Governor that states a minimum performance standard that ensures speeds in the HOV/transit lanes do not fall below 45 miles per hour more than 5 percent of the time during peak hours as measured and reported quarterly. If the performance standard is not met, mandatory triggers should be in place to increase the minimum number of passengers per vehicle in the HOV lanes or conversion of the HOV lanes to transit only lanes should occur. We also recommend that as part of the corridor management plan, performance standards be developed for the general purpose lanes on SR 520. We support the potential use of dynamic variable tolling along the entire corridor that would allow for increasing toll rates in order to achieve specific performance standards for general purpose as well as HOV/transit lanes. To ensure that these standards are enforced, legislation needs to be adopted mandating the triggers for actions to meet these performance goals.
ATTACHMENT 2: COMMENT LETTER FOR THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT WITH PHASING RECOMMENDATIONS

- Phase the decision on construction of the proposed second bascule bridge at Montlake Boulevard and test measures that may eliminate the need for construction. Require that the bridge be designed to provide priority for transit, pedestrian, and bicycle traffic if it is constructed.

   We continue to have reservations about the potential construction of a second bascule bridge across the Montlake Cut at Montlake Boulevard. Building a parallel bascule bridge at Montlake will likely necessitate the removal of two residential properties and further divide the Shelby-Hamlin neighborhood, which is already bisected by a 4-lane Montlake Boulevard that is traveled by more than 50,000 vehicles each day. If a second bascule bridge is to be constructed at Montlake, we recommend it be built to meet the following conditions:

   1) The second bridge should be built to accommodate no more than two lanes of traffic and include dedicated bicycle and pedestrian facilities. In order to reduce additional negative impacts on the Shelby-Hamlin neighborhood, the footprint of the new bridge should be as narrow as possible without compromising the safety of Montlake Boulevard, transit operations, or Seattle standards for bicycle and pedestrian facilities.

   2) The existing Montlake Bridge should remain a 4-lane roadway.

   3) If the second bridge is completed, the two crossings should operate in a 4+2 configuration, with four general purpose lanes and two dedicated HOV/transit lanes. If possible, the dedicated HOV/transit lanes should be located on the original bridge, with the northbound lane operating as a counterflow. This will allow center line operation, permit the use of existing electric wires, and avoid the installation of new electric wires on the new bridge.

   We will only consider supporting the construction of a second bridge across the Montlake Cut if the additional bridge is used to provide the capacity for dedicated facilities for HOV, transit, bicyclists, and pedestrians. We do not support the creation of additional roadway capacity along Montlake Boulevard for single occupant vehicles and other general purpose traffic.

   In order to determine whether the second bridge is needed, WSDOT, SDOT, Metro, and ST must work together to design and test systems that will facilitate the movement of transit through the Montlake corridor, such as signalization, signal timing, signal queue jumping for HOV/transit, dedicated HOV/transit lanes, and other techniques. WSDOT, SDOT, and Metro should identify and analyze traffic management options/plans for the entire neighborhood, including specifically the corridor between University Village and 23rd and Madison, and assess their impacts on arterials and neighborhood streets. The goal of the testing program should be to determine whether a combination of strategies can ensure the reliable movement of both transit using the SR 520 corridor and north-south transit through the City of Seattle.

- Reconfigure the ramps between SR 520 and Lake Washington Boulevard and develop a traffic management plan for the Washington Park Arboretum. Phase the decision on the construction of these ramps, test the effectiveness of a traffic management plan and other measures to protect the Arboretum, and ensure reliable movement of transit and other vehicular traffic through the 23rd Avenue/Montlake corridor.

   The 230-acre Washington Park Arboretum is one of the most cherished parks in the Puget Sound region and protecting its character and fragile environment is one of the City Council's top priorities for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. In addition to serving as a "living museum" of diverse plant species that draws visitors from around the world, the Arboretum also provides needed open space and recreational opportunities for thousands of nearby residents. After carefully considering the trade-offs associated with including ramps between SR 520 and Lake Washington Boulevard near the western edge of
the Arboretum, we have concluded that if ramps are built in this area, they must meet the following conditions:

1) The ramps must be reconfigured to connect to Lake Washington Boulevard at 24th Avenue East, thereby supporting the goal of constructing a larger, uninterrupted lid over SR 520 between 24th Avenue East and Montlake Boulevard, and avoiding the presence of ramps in the Arboretum.

2) A partial lid that extends east over the eastbound lanes of SR 520, from 24th Avenue to the Arboretum, should be constructed to help improve pedestrian connections to the Arboretum trail system.

3) WSDOT must agree to work with the City of Seattle to develop and implement a traffic management plan for the Arboretum. Such a traffic management plan would apply to the area that is bounded by SR 520 to the north, Lake Washington Boulevard to the east, Madison Street to the south, and 23rd Avenue to the west. The traffic management plan may include, but need not be limited to, traffic calming, tolling, reduced speed limits, and ramp use restrictions.

4) As part of the traffic management plan, the existing on- and off-ramps in the Arboretum should be closed early in the SR 520 project’s construction phase. The need for replacement ramps would then be reassessed once construction is nearing completion.

The Council wishes to implement this traffic management plan as quickly as possible and analyze the outcomes. Measurable goals should be set in consultation with the Arboretum Foundation, WSDOT, Metro, and SDOT, and sets of measures should be tested until the goals are effectively met. Implementation should proceed in conjunction with the work on 23rd and Montlake Avenues, and goals should include effective management of that corridor as well.
Evaluate a HOV/transit fixed span bridge at a location east of Montlake Boulevard. This option is not included in the current SDEIS but offers potential future benefit and should be evaluated as a separate project.

There are still major concerns about whether the configurations included in the SDEIS will actually be able to successfully facilitate the movement of traffic through the Montlake area, especially transit. We recommend that the state begin a process to review a possible high bridge to the east of Montlake Boulevard, between the MOHAI building and Marsh Island. Such a bridge would be an important option to provide a future light rail or bus rapid transit connection to Pacific Street and the University Link light rail station. Completing an environmental assessment of this potential bridge crossing could be very useful in developing future transportation plans for this area, especially if this project ultimately does not proceed with some of the elements that have been identified for possible phasing and further study. We recommend that the environmental analysis for a high HOV/transit bridge east of Montlake Boulevard be undertaken before the construction plans for SR 520’s west approach are finalized.
September 27, 2010

Julie Meredith
SR 520 Program Director
Washington State Department of Transportation
600 Stewart Street, Suite 520
Seattle, WA 98101

Dear Ms. Meredith:

Thank you for the opportunity to provide comments on the ESSB 6392 Design Refinements and Transit Connections Workgroup’s (ESSB 6392 Workgroup) Draft Recommendations Report. The multiagency process has been positive and productive, and has helped to improve working relationships among many of the key stakeholders in the SR 520, I-5 to Medina: Bridge Replacement and HOV Project (SR 520 Project).

The City Council’s key goals for the SR 520 Project remain as follows:

- **Improve Transit.** Maximize transit usage and connectivity, and prioritize transit along the SR 520 corridor and in adjacent Seattle neighborhoods by improving the speed, reliability, and expandability of local and regional transit service.

- **Improve the Pedestrian Environment.** Increase pedestrian access, mobility, comfort and security, and provide efficient and logical connections to transit and neighborhood destinations.

- **Improve the Bicycling Environment.** Increase bicycle access, mobility, comfort and security, and provide efficient and logical connections through adjacent Seattle neighborhoods.

- **Improve the Neighborhood Environment.** Improve the physical environment of adjacent neighborhoods for the health and benefit of residents. Minimize any new impacts that the SR 520 Project may have on these same communities.

- **Improve Montlake Traffic Operations.** Facilitate acceptable peak and off-peak local traffic operations for all users.

- **Improve the Arboretum.** Minimize impacts to the Arboretum in terms of vehicle volumes and speeds, improve access for visitors, and enhance the overall environment of the park.
We remain committed to working collaboratively with WSDOT, Governor Gregoire and the State Legislature to ensure that these collective goals for the SR 520 Project are met. With these objectives in mind, we have carefully reviewed the ESSB 6392 Workgroup’s recommendations and, through this letter, offer some specific comments regarding the various project elements that were evaluated.

We understand that the charge of the ESSB 6392 Workgroup was to refine the design and improve the transit connections for the Seattle portion of the SR 520 Bridge, using the April 2010 Preferred Alternative as a baseline. We also understand that once the Workgroup’s final recommendations report is issued later this year, WSDOT staff will work to incorporate those recommendations into a Final Environmental Impact Statement (FEIS) for the SR 520 Project. However, what is not obvious to us and remains unaddressed is how the process for making final design decisions for the SR 520 Project will continue to move forward after the FEIS is published in the spring of 2011 and how the City will be involved. In addition, we want to ensure that the cooperative relationship between the City and State is maintained as this project moves forward. We would appreciate a response from you that articulates how and when this body of work will be completed.

It is clear that the efforts of the ESSB 6392 Workgroup have enhanced the Preferred Alternative and the Seattle City Council agrees with the majority of recommendations that are detailed in the Workgroup’s draft report. However, some areas of concern remain:

1. **Second Bascule Bridge Across the Montlake Cut.** We appreciate the workgroup’s willingness to consider the City’s request to examine transportation demand management (TDM) options for delaying or even potentially eliminating the need to construct a second bascule bridge across the Cut. We understand that a second crossing is included in the Preferred Alternative and recognize the need for the environmental process to fully evaluate the impacts of a potentially new bridge. We also appreciate that the additional bridge could well be a component of the SR 520 Project that is necessary to meet our collective goals for the corridor. However, we remain committed to working with WSDOT on developing an agreement on the process for deciding whether the second bridge is needed and if so, when. As part of this process we support exploring TDM alternatives and concur with the Workgroup’s recommendation to establish specific triggers for future evaluation of the needs for the second crossing.

Identifying the three trigger factors to be measured (SR 520 mainline operations, transit travel times, and bike and pedestrian accommodation) represents an appropriate first step. Next, we believe that developing a clear process for monitoring and evaluating the timing and need for a second bascule bridge will be critical to ensure that a framework for decision-making is in place for future policymakers. We propose the following draft framework that could be used to formalize an agreed upon approach to addressing the question of the second bascule bridge:
Commitment to a corridor management agreement between the City of Seattle and WSDOT that would include an outline of the analytical and decision-making process for the second bascule bridge.

- Development of a baseline report that uses the latest traffic modeling from the FEIS and current "ground" values. This report would be updated annually, based on refinements to traffic models, progress on TDM strategies and construction, and modeled and ground values centered on the triggers that have been identified.
- A three year work plan and schedule to be developed by SDOT and WSDOT to implement TDM measures.
- A technical work group to be identified in the corridor management agreement that includes representatives from the WSDOT, SDOT, KC Metro, Sound Transit and the City Council and would meet at least twice per year.
- The technical work group would review the annual report on triggers, receive updates on TDM measures and make ongoing recommendations to WSDOT and the City as necessary.
- The technical work group would be responsible for making a final recommendation on proceeding to construction of the second bascule bridge to WSDOT and the City. WSDOT would agree to not proceed to construction for the second bascule bridge without Council approval.

We look forward to discussing and developing this process and agreement in greater detail with WSDOT and the Governor's office.

Beyond the triggers and decision process for the second crossing, we feel strongly that more work is needed by SDOT and WSDOT to develop a specific traffic management plan for the interim period between completion of the Montlake Interchange and possible construction of a second bascule bridge. We believe this interim traffic management plan must be aggressively and creatively geared toward forestalling construction of a second bascule bridge by accommodating, to the extent possible, transit, bicycle and pedestrian traffic across the Cut. In addition, we urge that the FEIS include an analysis of alternatives that seek to improve pedestrian and bicycle level of service across the Cut if transit queuing and traffic operations on SR 520 are managed through other means. This may include analyzing a narrower pedestrian and bicycle only second crossing.

2. Arboretum. We are satisfied with the progress made to-date on the Arboretum Mitigation Planning process. However, that effort is scheduled to run until the end of the year and additional analysis related to traffic management options is still needed. Funding responsibility for the improvements ultimately implemented also needs to be assigned.
Given the ongoing nature of this work, the Council wishes to reserve comment until after the Arboretum Mitigation Planning process concludes in December. Ultimately, we are seeking a balanced approach to traffic management in the Montlake area and the Arboretum. Prior to submitting its comments, the Council would also like to receive a briefing from WSDOT and SDOT on the Arboretum Mitigation Planning effort with specific attention to the following:

- The proposed left turn from 24th Avenue to East Lake Washington Boulevard and its specific impacts on the I-5 interchange, the Montlake Interchange and adjacent neighborhoods.
- WSDOT’s commitment to mitigation funding early in the project for Arboretum traffic calming and management in 2011 and beyond.
- SDOT’s near-term plans for traffic calming that could be implemented as early as 2011.
- SDOT’s plans for ongoing traffic monitoring and management in the vicinity of the Arboretum, and process for determining how and when additional traffic calming or management tools should be implemented.

3. **Corridor Transportation Demand Management Plan.** The State Legislature’s mandate related to corridor management in ESSB 6392 represents a good baseline from which to manage traffic operations on SR 520. We applaud the legislature for being explicit about the minimum occupancy level of three-plus for the HOV lanes and to require notification when the average speeds in the HOV lanes fall below 45 MPH at least ten percent of the time during peak hours. The Council urges WSDOT and the legislature to consider going even further by integrating the use of dynamic tolling with other traffic management tools to more efficiently and effectively manage traffic operations on SR 520. We believe that a single, integrated corridor transportation demand management plan overseen by WSDOT is the way to ensure the best possible results. We urge the legislature to adopt legislation that establishes clear triggers for conversion to full dynamic tolling on SR 520 and for changes to the minimum HOV occupancy levels to facilitate traffic flow, particularly for transit, on the corridor.

4. **Neighborhood Traffic Management Plans.** Traffic management in adjacent neighborhoods, especially those impacted by possible traffic reduction strategies proposed for the Arboretum, remains a key concern of the Council. Although we recognize that some of the potential neighborhood traffic impacts are still unknown, we strongly encourage WSDOT to create a mitigation funding source that will allow WSDOT and SDOT to address the specific issues as they arise.
Traffic management in the vicinity of Roanoke Park is one issue of particular concern to the Council. As the design specifics for the portion of the SR 520 Project that extends through this neighborhood continue to evolve, we would like WSDOT and SDOT to continue working together to resolve emerging neighborhood issues related to vehicle, bicycle and pedestrian circulation in the vicinity of the lid at 10th Avenue and Delmar Drive.

5. **Corridor Management Agreement.** With regard to the Arboretum, the second bascule bridge, and neighborhood traffic management, we feel strongly that SDOT and WSDOT would benefit from a formal corridor management agreement between the City and the State. Commitments and a clear delineation of responsibilities would be useful as SDOT and WSDOT continue to proceed with planning and implementation of a variety of elements related to these key corridor management areas. The Council requests that a commitment to developing such an agreement be incorporated within the FEIS as a means to jointly manage the ongoing impacts of the project.

6. **Bicycle and Pedestrian Accommodation.** We are very pleased with the Workgroup’s efforts to identify important non-motorized connections, conflict points and safety issues in the vicinity of SR 520, and to employ appropriate solutions. It is imperative that this work continue throughout the design and construction of the SR 520 Project in order to ensure that bicyclists and pedestrians are protected from conflicts with vehicles and that connections flow smoothly. The Council supports the continued involvement of SDOT and the Bicycle and Pedestrian Advisory Committee in design review, and construction management and mitigation efforts as the SR 520 Project moves forward.

7. **Portage Bay Bridge.** The Council remains skeptical that the Portage Bay Bridge design included in the Preferred Alternative is as narrow as it could be. Even though WSDOT has stated its intent to operate the facility at 45 MPH, the Preferred Alternative proposes a new Portage Bay Bridge that is more than 40 feet wider than the current bridge. Further narrowing the shoulder and lane widths proposed for this facility will cause the bridge to appear more like a boulevard and help to induce lower vehicle operating speeds. The Council is supportive of creating a boulevard design with elements such as a planted median that enhance the character and assist with traffic speed control. Ensuring that the cross-section of the new bridge provides transit priority opportunities, such as HOV or transit-only lanes, also remains a priority for the Council. In addition, we also encourage WSDOT to keep working with the Seattle Design Commission and SDOT as the design for the Portage Bay Bridge continues to be refined.

8. **West Approach/Foster Island.** We want to applaud the work of WSDOT and the SR 6392 Workgroup for continuing to identify options and alternatives to narrow the SR 520 corridor. As you know, the Council has consistently supported efforts to minimize the
footprint of the SR 520 Project. We want to encourage WSDOT to continue to explore options to narrow structures on the corridor and have a specific suggestion to offer for consideration: WSDOT should examine the impacts of moving the transition of vehicular speeds on the mainline to the west high-rise and manage the corridor from that point west at 45 MPH, with roadway design consistent with the lower speed. This design speed could possibly be designated for only the non-HOV lanes. Doing so could allow for further narrowing of the structure and also aid in the transition to the Montlake Interchange and reduce noise in the Arboretum and Madison Park. We urge WSDOT to evaluate this approach as part of the FEIS.

9. **Parks and Public Lands.** Although this issue was not specifically addressed in ESSB 6392, we would like to use this opportunity to express two specific concerns:

   - Existing public land in McCurdy Park that is removed from public use should be replaced with comparable lands within the immediate vicinity of McCurdy Park and be easily accessible to nearby residents, without requiring pedestrians to cross major off-ramps or streets. Safe and attractive bicycle and pedestrian connections between the Arboretum and the new SR 520 lid in Montlake should also be provided.
   
   - Disruptions to other public lands in the vicinity of the SR 520 corridor should be minimized. The Roanoke neighborhood, in particular, is home to several pockets of public land that have been enhanced by local residents. While not officially "parks" that are managed by the City of Seattle, these open spaces are considered parks by the residents that live near and use them. At a minimum, the Council would like WSDOT to create an inventory of all such public lands and assess whether any of these properties will be affected by the construction of the SR 520 Project. We also encourage WSDOT to work with neighborhoods and consider mitigating any potential disturbance of these properties by relocating any such open spaces that are determined to be in the final footprint of the construction area for the new SR 520 Bridge.

10. **Transit Service and Funding.** The ESSB Transit Planning and Finance Workgroup will begin meeting this fall and is scheduled to release its final recommendations report by the end of this year. As transit functionality will be key to both construction period traffic management and the long-term operation of the SR 520 corridor, the Council will be closely tracking and reviewing the outcomes of this workgroup process. The Council requests a full report on the findings and recommendations of the ESSB Transit Planning and Finance Workgroup as the group's deliberations are coming to a close. We would also like to take this opportunity to reiterate our support for the use of project mitigation funds and toll revenues to finance transit operations along the corridor and mitigate mobility issues resulting from construction.
11. **Bus Stop Locations / Re-locations and the Montlake Triangle.** The Council applauds the collaborative work carried out by the UW, WSDOT, King County Metro and Sound Transit to find a solution to moving forward with redevelopment of the Montlake Triangle and enhancements for transit, pedestrian and bicycle mobility. We also recognize that the ESSB 6392 Workgroup has recommended several potential changes to bus stop locations along Pacific Place and Montlake Boulevard. In particular, we would like to acknowledge that the proposal to create a northbound Montlake bus stop on the newly created lid appears a promising means of enhancing transit connectivity. We support the Workgroup’s recommendations and look forward to seeing transit riders and neighborhood residents engaged in this effort before any decisions are finalized.

12. **Commitment to High Capacity Transit and Light Rail Accommodation.** We are very pleased with the progress WSDOT and the Workgroup have made in this area and recognize that substantial effort has been made to determine the specific design refinements required to accommodate light rail on the SR 520 Bridge in the future. For the purposes of the FEIS the Council believes sufficient progress has been made. However, we support continued efforts to ensure every possible consideration is accounted for without substantially increasing the cost or environmental scope of the current project.

13. **Commitment to Mitigation.** The Council is seeking formalized commitments from WSDOT regarding funding for project mitigation. The Council believes these commitments should be firmly established and specific funding amounts assigned to each element of the City’s mitigation plan.

Other issues that are outside the scope of the ESSB 6392 Workgroup’s Draft Recommendations Report will also remain important to the Council as the SR 520 Project continues to move forward. Those issues include the following:

1. **Project Process.** It is unclear how the SR 520 Project will proceed once the FEIS is published. At what time or under what threshold will the City receive assurance that the critical Seattle portions of the project will be fully funded along with the rest of the project? We request that WSDOT and the City develop clear expectations, agreements, and commitments on the final project design and construction process. We request that any understanding between the City and State on this topic take the form of a formal corridor management agreement. The Council will work in partnership with the State to develop these agreements.

2. **Funding.** The funding gap for the SR 520 Project is currently estimated at close to $2 billion. To help close this gap, the Council favors full dynamic tolling for the general purpose lanes on I-90 (as opposed to HOT lanes only). This approach would also help to ensure balanced traffic flow on the two floating bridges that cross Lake Washington.
It is a priority for the Council that the entire SR 520 replacement project, from SR 202 to I-5, be fully funded, and we would be pleased to join WSDOT in seeking funding for the project from the legislature. We want to be clear that the Council's endorsement of the Workgroup's project design refinements to the preferred alternative and the project as a whole is dependent upon full funding for all project elements on the Westside and the accompanying mitigation.

Thank you again for considering our comments. We appreciate the efforts of all the members of the ESSB Design Refinements and Technical Connections Workgroup and believe this process has produced important and needed results. We look forward to working in continued partnership with you as the SR 520 Project moves forward.

Sincerely,

[Signatures]

Council President Richard Conlin
Councilmember Sally Bagshaw
Councilmember Tim Burgess
Councilmember Sally J. Clark
Councilmember Jean Godden
Councilmember Bruce Harrell
Councilmember Nick Licata
Councilmember Mike O'Brien

CC: Governor Christine Gregoire
Paula Hammond, WSDOT Secretary
Senator Mary Margaret Haugen
Representative Judy Clibborn
Mayor Michael McGinn
Peter Hahn, SDOT Director