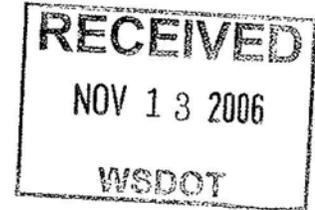




October 30, 2006

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



Dear Mr. MacDonald,

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

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

Mobility

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

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

C-001-001

C-001-002

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

C-001-004

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

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

C-001-005

Financing

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

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

Protection of the Natural Environment

C-001-006

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

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

C-001-008

Protection of Human Health

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

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

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

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

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

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

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

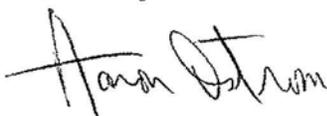
c-001-014 | Reduction of the Alternative Footprints

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

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

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

Sincerely,



Aaron Ostrom

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



**Board of Directors**

October 31, 2006

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

RE: SR 520 Draft Environmental Impact Statement

Dear Mr. Krueger:

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

C-002-001

**Board of Advisors**

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Virginia Wilcox

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

C-002-003

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

Mr. Paul Krueger  
October 31, 2006  
Page 2

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

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

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

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

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

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

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

**Assessment of Adverse Effects**

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

Mr. Paul Krueger

October 31, 2006

Page 3

C-002-007

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

C-002-008

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

C-002-009

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

C-002-010

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

C-002-011

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

Mr. Paul Krueger  
October 31, 2006  
Page 4

**Section 4(f) Analysis**

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

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

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

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

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

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

Mr. Paul Krueger

October 31, 2006

Page 5

c-002-015

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

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

On behalf of the Board of Directors,

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

Douglas E. Jackson  
President

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

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



STATE OF WASHINGTON

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

November 2, 1998

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

In future correspondence please refer to:

Log: 050598-09-FTA

Re: Central Link Light Rail Transit  
Project Determinations of Eligibility

Dear Mr. Irish:

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

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



# **Laurelhurst Community Club**

Serving 2800 Households and Businesses in Seattle's Laurelhurst Neighborhood

## **Laurelhurst Community Club SR520 Position Statement**

September 11, 2006

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

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

### **C-003-002 | Inter-modal Connectivity**

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

### **C-003-003 | Local Traffic Impacts**

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

### **C-003-004 | Noise**

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

### **C-003-005 | Washington Park Arboretum**

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

C-003-006

### **Project Scale**

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

C-003-007

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

C-003-008

### **Conclusion**

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

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

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



Jean Amick, LCC Transportation Committee  
3008 East Laurelhurst Drive NE  
Seattle, Washington 98105  
206-525-7065      [jeanseattle@earthlink.net](mailto:jeanseattle@earthlink.net)



Joseph Herrin AIA, LCC Transportation Committee  
5040 47<sup>th</sup> Avenue NE  
Seattle, Washington 98105  
206-525 6541      [jherrin@heliotrope.cc](mailto:jherrin@heliotrope.cc)

**CITIZENS FOR A SANER SOLUTION**  
SANERSOLUTION@GMAIL.COM

September 18, 2006

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

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

Re: Proposed SR 520

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

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

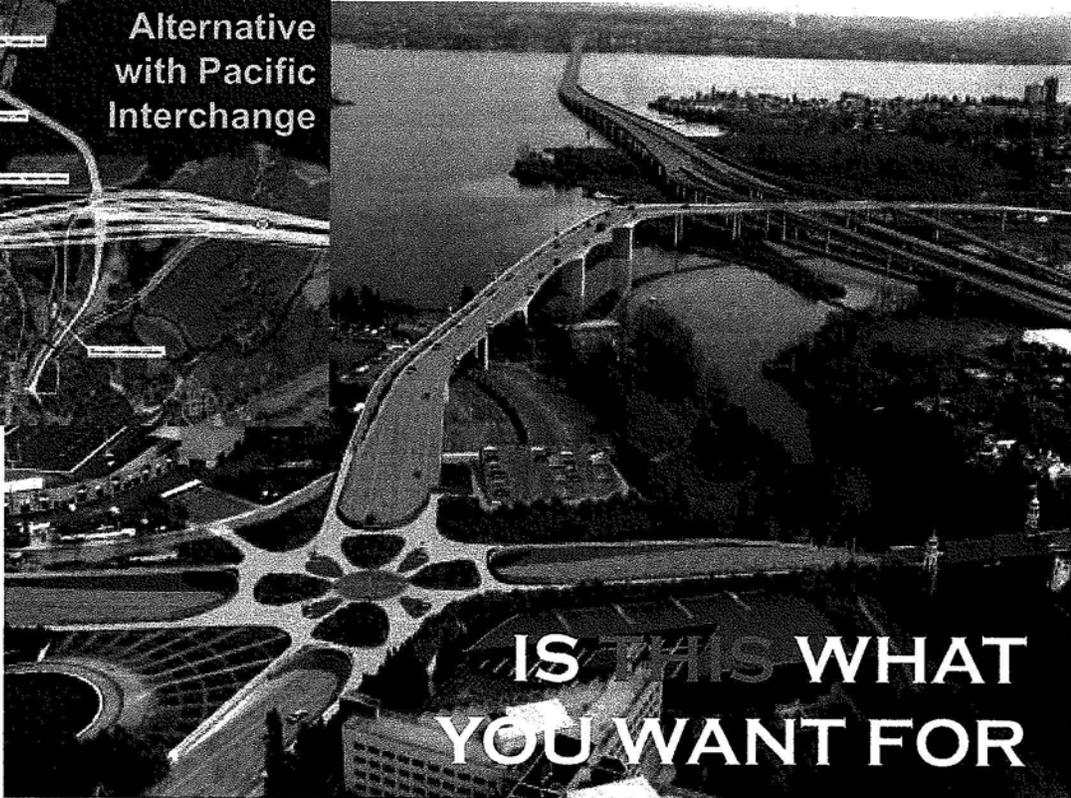
The attached documents outline the elements of a new proposal – a saner solution.

Please give this idea full consideration.

C-004-001



**SR520**  
**WSDOT**  
**6-Lane**  
**Alternative**  
**with Pacific**  
**Interchange**



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

**IS THIS WHAT**  
**YOU WANT FOR**

# **SEATTLE ???**

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

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

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

**THANK YOU**

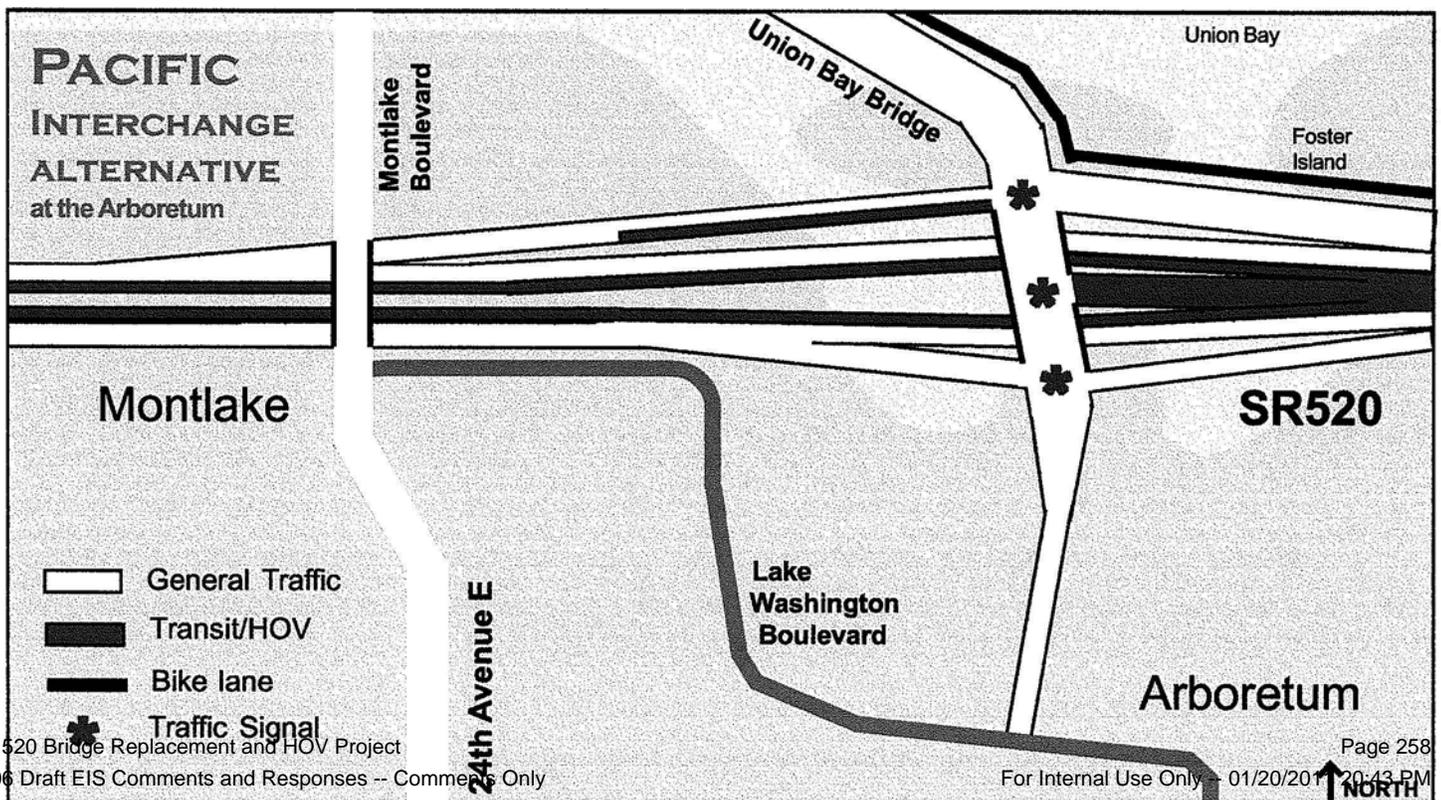
# SEATTLE CAN DO BETTER AT SOLVING ITS TRANSPORTATION CHALLENGES!

## FOR SR520 WE CAN DO A BETTER JOB AT:

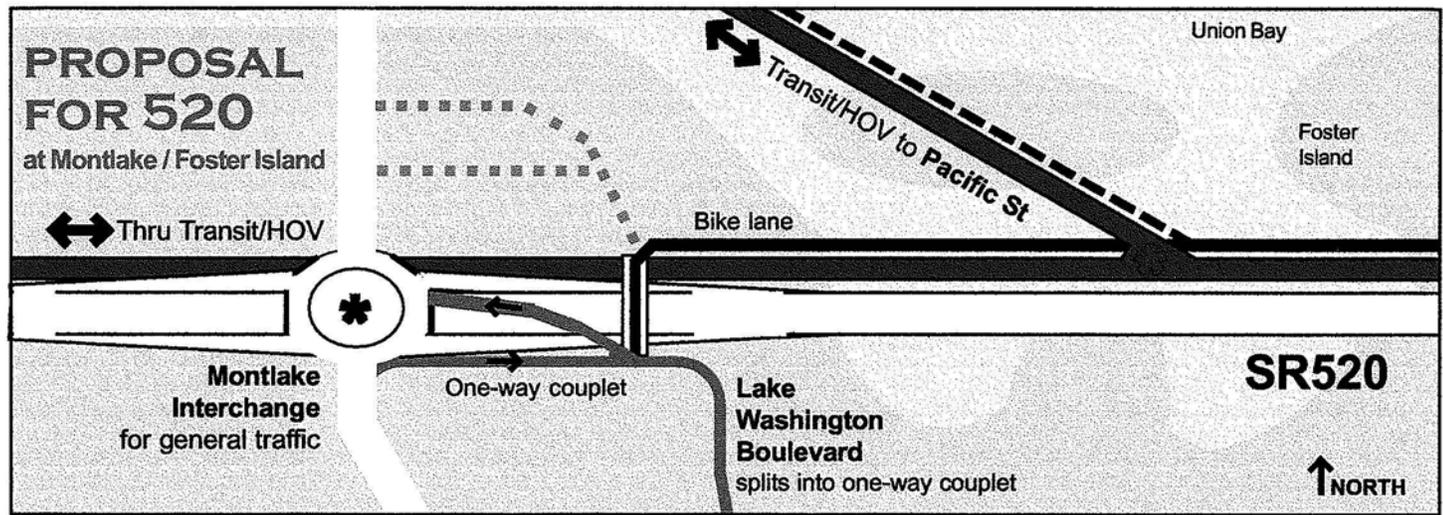
- protecting our natural systems, parks & historic resources, while
- moving more people efficiently & effectively,
- providing better options for high capacity transit connections, and
- facilitating phasing and reducing the costs of construction.

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

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



# HERE'S A SANER SOLUTION TO CONSIDER .....



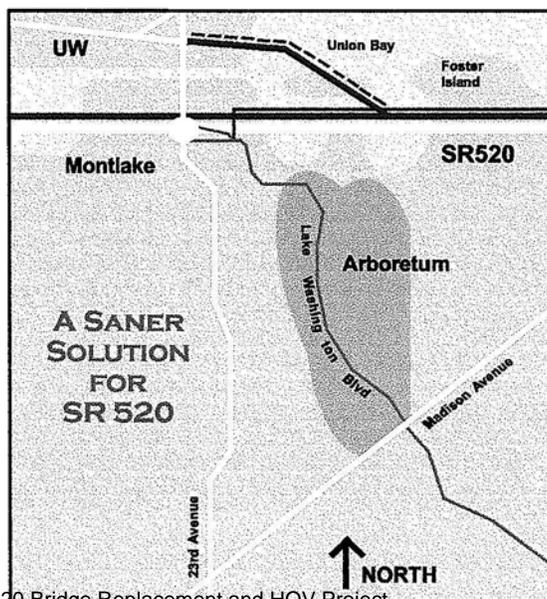
## GOALS:

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

## LEGEND for Saner Solution

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

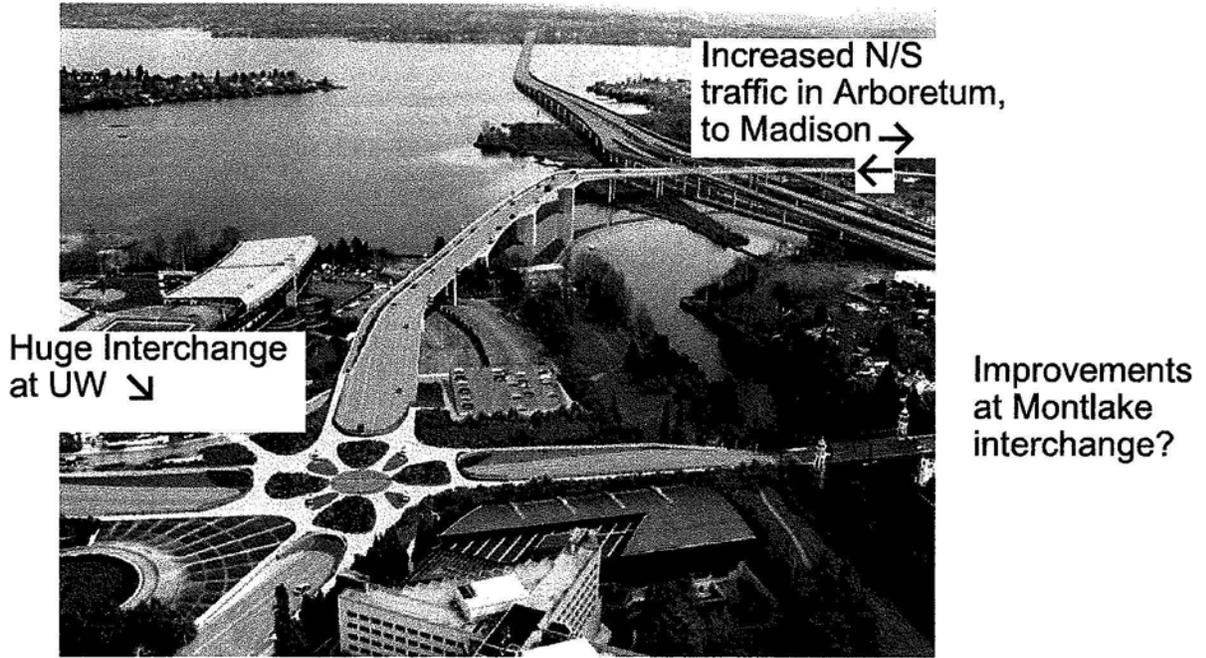
NOTE: Lid locations to be determined



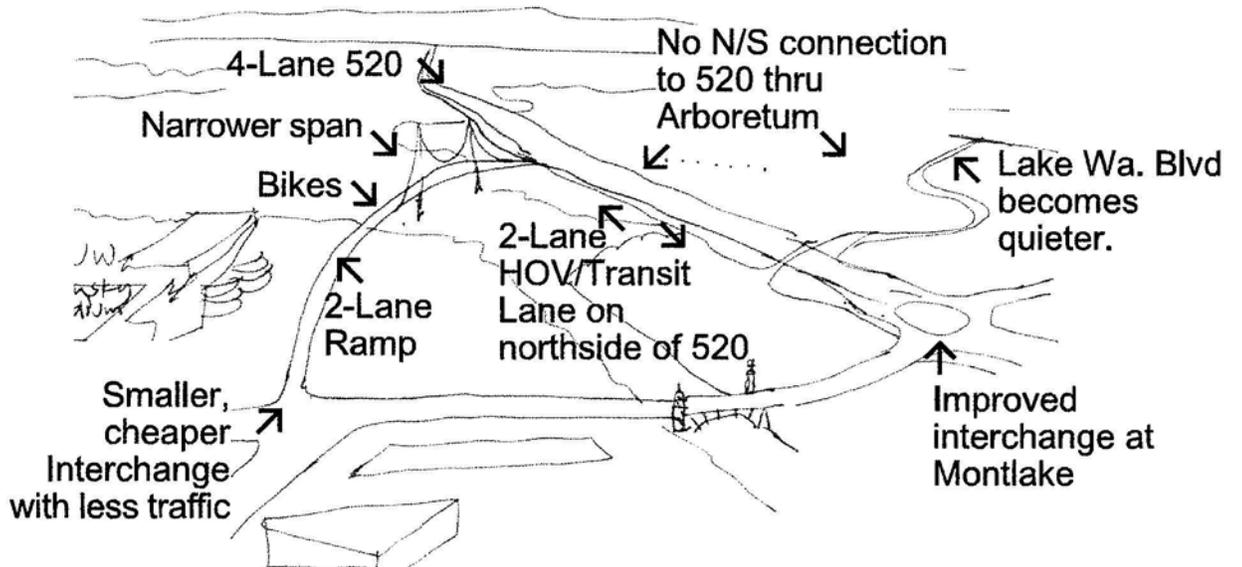
## DESCRIPTION:

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

## HELP ADVOCATE for a saner solution to SR520!



# WSDOT 6-Lane Alternative with Pacific Street Intersection



SanerSolution@gmail.com



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

September 22, 2006

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

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

Dear Mr. Krueger:

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

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

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

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

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

September 22, 2006  
Page 2

C-005-001

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

**An additional connection at 37<sup>th</sup> Avenue East is unnecessary.**

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

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

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

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

An overpass connection at Montlake Boulevard; and

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

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

**An additional connection at 37<sup>th</sup> Avenue East would unnecessarily exacerbate environmental impacts of the bridge.**

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

**A connection at 37<sup>th</sup> Avenue East would conflict with the City's Critical Areas Ordinance.**

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

**A connection at 37<sup>th</sup> Avenue East would violate NEPA and SEPA.**

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

**A connection at 37<sup>th</sup> Avenue East would violate the Clean Water Act.**

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

September 22, 2006  
Page 4

C-005-001

**A connection at 37<sup>th</sup> Avenue East would violate the Federal Department of Transportation Act.**

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

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

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

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

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

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

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

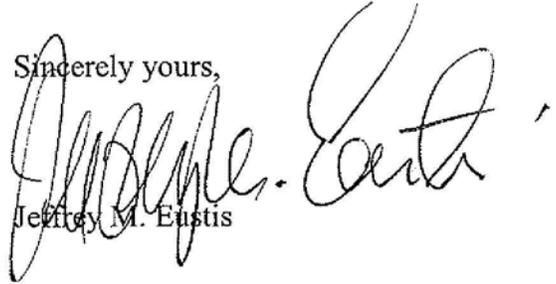
September 22, 2006  
Page 5

C-005-001 |

Arboretum, its wetlands and waterways.

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

Sincerely yours,



Jeffrey M. Eustis

JME/py

cc:  
James Leonard  
Megan White  
Perry Weinberg  
SWAMP

## University Village Merchants Association

September 22, 2006

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

Dear Mr. Krueger,

C-006-001

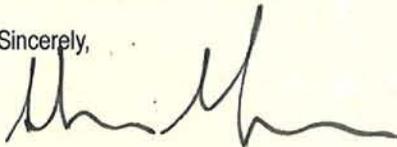
This letter is submitted on behalf of the University Village Merchants Association which represents the over 100 merchants doing business at University Village, a significant shopping resource for consumers throughout the Pacific Northwest and particularly in Seattle. The merchants in our Association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

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

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

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

Sincerely,



Shawn Garner of Zao Noodle Bar

Representing the University Village Merchants Association Board of Directors:

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

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

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

---

**From:** earljb@netscape.net [mailto:earljb@netscape.net]

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

**To:** SR 520 DEIS Comments

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

**Subject:** SR 520 Comments of DEIS

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

Earl J. Bell  
Board Member

---

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# UNIVERSITY PARK COMMUNITY CLUB

OCTOBER 10, 2006

Paul Krueger  
Environmental Manager  
SR 520 Bridge Replacement Project

[Comments sent to sr520deiscomments@wsdot.wa.gov](mailto:sr520deiscomments@wsdot.wa.gov)

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

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

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

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

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

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

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

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

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

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

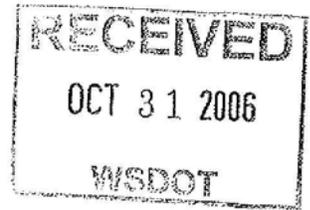
c-007-002 | Thus, with the recent adjustments due to inflationary pressure and the Seattle City Council's apparent preference for the most expensive option, the process is dangerously close to assurance that the PPA will not be fully funded. This being the case, the UPCC urges the adoption of the 6-lane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

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

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

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

Earl J. Bell  
Board Member



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

*Maintaining the Ethnic and Economic Diversity of the Leschi Community*

October 5, 2006

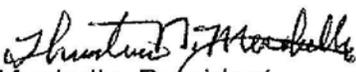
TO: Paul Krueger, WSDOT Environmental Manager  
FROM: Leschi Community Council  
RE: 520 options and Need for Increased Police

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

c-008-001

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

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

Sincerely,   
Thurston Muskelly, President  
Leschi Community Council

c: City Council Members  
Mayor Greg Nickels  
Governor Christine Gregoire

# MONTLAKE COMMUNITY CLUB

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

October 14, 2006

## VIA E-MAIL AND U.S. MAIL

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

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

Dear Mr. Milton:

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

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

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

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

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

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

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

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

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

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

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

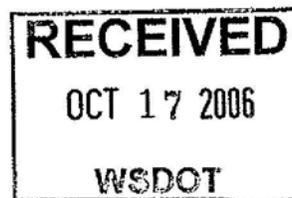
Please contact me with any questions or comments.

Sincerely,



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

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





# City of Seattle Department of Neighborhoods

Bernie Matsuno, Acting Director

Gregory J. Nickels, Mayor

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

October 18, 2006

Members

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

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

Mr. Krueger,

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

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

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

Thank you for considering our comments.

Sincerely,

Matt Fox, Co-Chair  
CUCAC

Danny Kraus, Co-Chair

cc: Mayor Greg Nickels  
Seattle Councilmembers



- C-010-001
- Alternates
  - Chris Leman
  - Neal Wechsler
  - Tom Roth
  - Larry Sinnott
  - Brian Ramey
  - Ruddi Risler
  - Mark Holden

- C-010-002
- Ex-Officio Members
  - Cliff Louie - DON
  - Theresa Doherty - UW



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

Re: SR 520 DEIS RESPONSE FROM ARBORETUM FOUNDATION

Dear Mr. Krueger:

INTRODUCTION

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

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

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

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

DISCUSSION

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

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

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

c-011-001

c-011-001

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

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

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

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

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

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

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

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

C-011-001

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

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

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

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

#### CONCLUSION

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

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

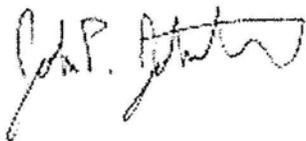
Therefore, we call for:

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

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

Sincerely,



John P Johnston, President  
Arboretum Foundation

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



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

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

October 21, 2006

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

C-012-001

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

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

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

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

*Steve Sulzbacher*  
Steve Sulzbacher, Ph.D.  
Vice President



# Seattle Yacht Club

*Established in 1892*

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

October 23, 2006

Re: Comment on Draft 520 EIS

Dear Mr. Kruger:

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

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

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

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

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

Mr. Paul Kruger  
October 13, 2006  
Page 2

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

1. Encroachment Into Portage Bay by Roadways.

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

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

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

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

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

Mr. Paul Kruger  
October 13, 2006  
Page 3

3. Roadway Filth

C-013-004 | Our review of The Report found that Air Quality related to The Project was well defined as to the types of pollutants, content of pollutants and source of pollutants but show that little or no effort has been made to include into the design of The Project any mitigation to relieve the adjacent neighborhoods of the particulate pollutants generated by the automobiles and trucks from tires and engine discharge. The Seattle Yacht Club is subjected to continual traffic filth raining down onto the boats, buildings and parking lots. This is a costly and cumbersome maintenance project for the Club and for the boat owners who are faced daily with the need to clean their boats from road grime and tire dust. The existing roadways are extremely imposing and there is no reason to expect the new facility to be any improvement without some collecting equipment being included into the design. The Seattle Yacht Club requests that the result of this road filth be somehow mitigated.

4. The "Montlake Mess"- Too Much Congestion

C-013-005 | The Seattle Yacht Club's membership only access to their Clubhouse and moorage facilities is from Montlake Boulevard via Hamlin street. Today our membership experiences long waits in an insufficient storage lane to make left turns from northbound Montlake Boulevard onto westbound Hamlin Street. Likewise, members leaving from Shelby Street either northbound or southbound onto Montlake Boulevard face long waits. Careful examination of this Draft EIS shows no relief for our problem *with the exception of the Pacific Street Interchange option*. It appears that the other designs offered are aimed at a greater through-put on both SR 520 and Montlake Boulevard giving little or no relief to congestion. This is an important reason to the Seattle Yacht Club why the Pacific Interchange option should be chosen.

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

C-013-006 | It appears that reconstruction of the western end of SR 520 is inevitable. Seattle Yacht Club urges the WSDOT to go to extreme measures in planning the demolition and reconstruction methods so that their impacts on the Montlake and Portage Bay communities will be minimized. A 7 to 8 year construction period will adversely impact individual boaters and the yacht club itself.

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

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

Mr. Paul Kruger  
October 13, 2006  
Page 4

6. Traffic Noise Reduction with Sound Walls

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

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

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

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

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

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

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

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

Mr. Paul Kruger  
October 13, 2006  
Page 5

C-013-009

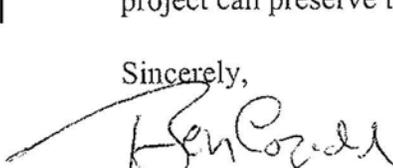
conflicts, not to mention the incredible daily burden of noise and inconvenience that will be placed on the immediate residents of Hamlin and Shelby streets. This underscores the need for the Seattle Yacht Club and the Montlake neighborhood to be integrally involved in the construction process.

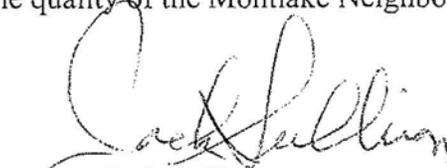
The Seattle Yacht Club looks forward to the SR 520 Bridge Replacement and HOV project to be a safe, quickly built facility that is successful in reducing traffic congestion for the motoring public yet preserving all boating alternatives and employing mitigation measures for dust, noise and avoiding any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

C-013-010

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

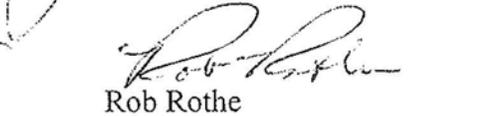
Sincerely,

  
Ben Cozadd  
Commodore

  
Jack Sullivan  
Vice Commodore

  
Fred Roed  
Rear Commodore

  
Chris Otorowski  
Staff Commodore

  
Rob Rothe  
Chair, Mainstation Committee  
Seattle Yacht Club

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

Mr. Paul Kruger  
October 13, 2006  
Page 6

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

SYC



Dwight G. Shaw  
Commodore

# Seattle Yacht Club

*Established in 1592*

June 19, 2002

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

Dear Mr. Mac Donald,

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,  
  
Dwight G. Shaw  
Commodore

Distribution:

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

Tran slake Project  
Impacts on  
Seattle Yacht Club

Air Quality

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

Water Quality

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

Visual Pollution

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

Noise Pollution

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

Increased Traffic Congestion

Project revisions restricts and encumbers access to club facilities.

Reduced Waterway and Navigational Space

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

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

Fish Impacts (degradation of fish habitat)

Endangered Species (Portage Bay crayfish)

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

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

Parking (Reduction of available parking)

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

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

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

October 31, 2006

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

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

Dear Mr. Krueger:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Joseph Herrin AIA, LCC Transportation Committee  
5040 47<sup>th</sup> Avenue NE  
Seattle, Washington 98105  
206-525 6541  
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ENC: Laurelhurst Position Statement of September 11, 2006

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

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

viability.

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

### **Inter-modal Connectivity**

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

### **Local Traffic Impacts**

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

### **Noise**

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

### **Washington Park Arboretum**

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

### **Project Scale**

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

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

### **Conclusion**

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

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

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

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3008 East Laurelhurst Drive NE  
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206-525-7065  
[jeanseattle@earthlink.net](mailto:jeanseattle@earthlink.net)

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Jean G. Amick  
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vickernick@hotmail.com

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

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

October 31, 2006

To: Washington State Department of Transportation

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

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

Dear Sir/Madam:

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

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

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

**DEMAND FOR A COMPLETELY NEW BRIDGE:**

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

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

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

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

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

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

C-015-001

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

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

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

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

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

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

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

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

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

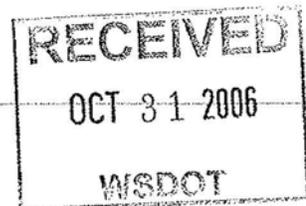
Thank you for your attention to our concerns; we also look forward to your response to our request for a necessary Supplementary Draft EIS.

Sincerely,

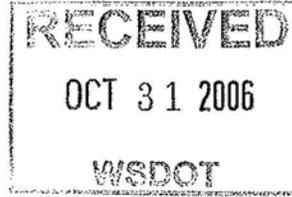
Maurice B. Cooper,

President, Madison Park Community Council.

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October 31, 2006



*Microsoft*

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

SUBJECT: SR520 Bridge Replacement and HOV Project Draft EIS Comments

Dear Mr. Leonard:

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

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

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

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

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

c-016-001

C-016-002

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

C-016-003

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

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

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

Sincerely,



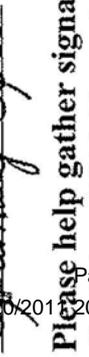
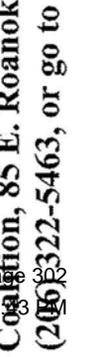
Chris Owens, General Manager – Real Estate & Facilities  
Microsoft Corporation

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

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

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

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	<u>Julie Briselden</u>	<u>12527 Roosevelt Way NE</u>		
	<u>Cory Parker</u>	<u>SEATTLE, WA 98123</u>		
	<u>Nathaniel S. Cormier</u>	<u>3609 Burke Ave N</u>	<u>sparker@jonesandjones.com</u>	<u>206</u>
	<u>KEITH J. BATES</u>	<u>Seattle, WA 98103</u>	<u>ncormier@jonesandjones.com</u>	<u>206.913-1627</u>
	<u>GRANT R. JONES</u>	<u>8717 DARTON AVE. N</u>	<u>kbates@jonesandjones.com</u>	<u>206.280-8410</u>
	<u>Paul Olson</u>	<u>SEATTLE WA 98103</u>	<u>gjones@jonesandjones.com</u>	
	<u>Rosemary Rice</u>	<u>1025 21st Ave SW</u>		
		<u>Seattle, WA 98146</u>	<u>Rosemary@makensay.com</u>	

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



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

---

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

October 31, 2006

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

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

Dear Mr. Krueger:

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

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

C-018-001

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

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

Enclosures

\*\*\* eSafel scanned this email and found no malicious content \*\*\*  
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## SEATTLE COMMUNITY COUNCIL FEDERATION

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

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

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

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

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

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

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

*Jeannie Hale*

Jeannie Hale, President  
3425 West Laurelhurst Drive NE  
Seattle, Washington 98105  
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## **Laurelhurst Community Club**

Serving 2800 Households and Businesses in Seattle's Laurelhurst Neighborhood

### **Laurelhurst Community Club SR520 Position Statement**

September 11, 2006

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

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

#### **Inter-modal Connectivity**

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

#### **Local Traffic Impacts**

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

#### **Noise**

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

#### **Washington Park Arboretum**

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

C-018-013

### **Project Scale**

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

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

### **Conclusion**

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

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

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



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5040 47<sup>th</sup> Avenue NE  
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**From:** Greg Hill  
**Sent:** Tuesday, September 05, 2006 9:19 AM  
**To:** Jan.Drago@seattle.gov  
**Cc:** David.Della@Seattle.gov; Jean.Godden@Seattle.gov; Nick.Licata@seattle.gov; Peter.Steinbrueck@seattle.gov; Richard.Conlin@seattle.gov; Richard.McIver@seattle.gov; Tom.Rasmussen@Seattle.gov; The Honorable Sally Clark@Seattle.gov  
**Subject:** Wallingford SR 520

Dear Councilmember Drago,

C-018-014

### **Pacific Interchange**

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

### **Local Street Impacts**

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

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

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

C-018-015

### **City-wide Traffic Impacts**

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

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

C-018-016

### **Impact to Seattle Open Space**

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

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

C-018-017

**Regional Impact**

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

C-018-018

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

Gregory Hill, Transportation Chair  
Wallingford Community Council

# UNIVERSITY PARK COMMUNITY CLUB

OCTOBER 30, 2006

Paul Krueger  
Environmental Manager  
SR 520 Bridge Replacement Project

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Earl J. Bell  
Board Member

## Observations on Rebuilding SR 520

by Larry Sinnott, Ravenna-Bryant Community Association Boardmember

C-018-020

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

C-018-021

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

C-018-022

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

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

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

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

**Decision Schedule;**

City Council and Mayor

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

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

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

WSDOT Draft EIS

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

Mon 2 Oct - Close of written comment period

SR 520 Executive Cmte

?? Oct - SR 520 Joint Recommendation to Governor

Sec. of Transportation

Review of SR 520 Joint Recommendation

Governor

?? Jan - SR 520 Decision

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

C-018-024

Traffic ---

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

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

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

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

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

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

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

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

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

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

Pedestrian mobility ---

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

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

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

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

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

Parking ---

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

c-018-024

envisions be stashed?

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

Displacement ----

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

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

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

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

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



**SR520 Position Statement**  
September 19, 2006

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

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

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

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

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

**Stake holder meetings**

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

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

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

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

**Conclusion**

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

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



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



**HAWTHORNE HILLS COMMUNITY COUNCIL**

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

September 29, 2006

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

C-018-026

RE: Pacific Street Interchange and SR 520 replacement

Dear Mayor Nickels;

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

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

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

Sincerely,

Bonnie E. Miller, President

CC: Seattle City Council  
Governor Christine Gregoire

September 15, 2006

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

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

c-018-027 | Dear Mr. Krueger:

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

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

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

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

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

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

C-018-027

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

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

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

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

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

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

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

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

###

## RESOLUTION

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

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

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

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

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

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

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

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

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

The preferred alternative chosen must be consistent with the following:

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

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

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

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

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

---

Chair of the Board of Park  
Commissioners



October 4, 2006

Re: Oral testimony on SR 520, Seattle City Council

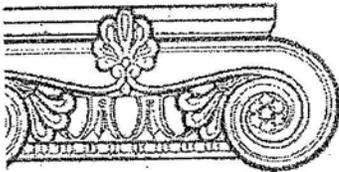
C-018-028

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

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

Thank you for the opportunity to comment tonight.

Matthew Mega, AICP  
Director of Urban Habitat



**Seattle  
Design  
Commission**

October 6, 2006

Greg Nickels  
*Mayor*

Karen Kiest  
*Chair*

Tasha Atchison

Pam Beyette

Evan Bourquard

Brendan Connolly

John Hoffman

Mary Johnston

Anindita Mitra

Dennis Ryan

Darrell Vange

Guillermo Romano  
*Executive Director*

Layne Cubell  
*Senior Staff*



Department of Planning  
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printed on recycled paper

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

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

Honorable Mayor Nickels and City Council Members:

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

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

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

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

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

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

C-018-031

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

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

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

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

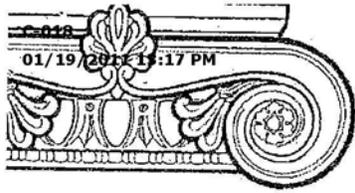
WSDOT has started the important early design work and clearly much more work and refinement lies ahead. The City needs a clear, long-range vision for this critical project in order to achieve excellence in design, mobility, transit connectivity and development that fits Seattle's unique urban and environmental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

Sincerely,



Karen Kiest  
Chair

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



# Seattle Design Commission

## MEMORANDUM

Greg Nickels  
*Mayor*

David Spiker  
*Chair*

Pam Beyette

Adam Christiansen

John Hoffman

Karen Kiest

Anindita Mitra

Sheri Olson

Nic Rossouw

Dennis Ryan

Darrell Vange

Guillermo Romano  
*Executive Director*

Layne Cubell  
*Senior Staff*

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

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

**DATE:** August 11, 2006

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

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

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

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



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

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

C-018-037

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

C-018-038

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

C-018-039

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

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

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

# Technical Memorandum



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

**To:** Theresa Doherty, University of Washington

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

**Copies:** Dyanne Sheldon

**Date:** October 17, 2006

**Subject:** SR 520 Bridge Replacement and HOV Project EIS  
Review

**Project No.:** 30907

C-018-040

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

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

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

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

*SR 520 Bridge Replacement and HOV Project EIS Review*

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

Page 2  
October 17, 2006

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

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

## **Wetlands**

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

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

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

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

C-018-040

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

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

C-018-040

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

C-018-040

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

C-018-040

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

## Water Resources

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

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

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

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

C-018-040

Table 2 Water Resources Comments		
Section	Page or Exhibit Number	Comment
Appendix T— Water Resources	Page 82	The technical appendix provides a limited evaluation of temporary construction effects on surface water bodies by determining construction actions that may disturb soil and in-water sediments, and by evaluating the potential for accidental spills of hazardous materials. However, areas where erosion and sediment disturbance would be a problem are not identified, nor are Best Management Practices to reduce the risks specified. Instead, this is all left to the TECS plan that is not yet prepared. This lack of information makes it difficult for the reader to fully understand the problems associated with these direct impacts to water quality.
Appendix T— Water Resources	Page 86	<i>"It is unlikely that turbidity would increase in the photic zone (the area of the lake or water body where there is enough light for photosynthesis to take place), and therefore turbidity from project construction would not adversely affect plant photosynthesis or lake productivity. Similarly, water column concentrations in these same upper layers of the lake would be unlikely to reach concentrations that would adversely affect fish (1,000 mg/L for 24 hour [Parametrix 1997]) in this same zone."</i> The report cited here is not available for review so there is no way to verify these scientific findings.
Appendix T— Water Resources	Page 83	<i>"Construction of the new bridges would involve work in and near the waters of Portage Bay and Lake Washington. Construction of work bridges, installation of new columns for the Portage Bay Bridge and the approaches to the Evergreen Point Bridge, and anchoring of the floating bridge pontoons would all take place in the open water, as would construction of the Union Bay Bridge under the Pacific Street Interchange option."</i> There is no discussion of how this is going to be done or the specific impacts that will result. The DEIS does provide general water quality impacts from general construction activities, but does not address the effects from this work, some of which reflect new technologies that may have impacts which have not yet been determined. Rather, the DEIS states that WSDOT will <i>"mitigate the project's potential effects on water quality"</i> because they will <i>"implement plans to control erosion, sedimentation, and spills during construction consistent with the requirements of federal, state, and local permits related to in-water work."</i> More detail is needed in order to determine if this alternative is viable first.
Draft EIS	Page 8-24, 8-25	The DEIS indicates that there will be increased turbidity, but fails to mention to what degree or the potential impacts.

C-018-040

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

C-018-040

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

C-018-040

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

### Wildlife Habitat

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

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

c-018-040

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

C-018-040

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

C-018-040

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

## Geology

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

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

Page 14  
October 17, 2006

C-018-040

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

#### **Landslide Hazards**

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

#### **Seismic Hazards**

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



## Memorandum

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

**From:** Tom Noguchi, Mirai Transportation Planning and Engineering

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

**Date:** October 13, 2006

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

### 1. Goals of 6-Lane Alternative Options

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

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

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



C-018-041

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

## 2. Transit Connections to Sound Transit Husky Stadium Station

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

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

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

## 3. Traffic Impacts of Tolls

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



C-018-041

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

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

#### 4. Daily Traffic Volumes

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

#### 5. Intersection Levels of Service Analysis

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

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

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

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



C-018-041

## 6. Travel Time Analysis

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

## 7. Traffic Impact and HOV Lanes on Pacific Street

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

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

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

## 8. Traffic Impact on Montlake Boulevard

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

## 9. Traffic Impact on Lake Washington Boulevard through Arboretum

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

C-018-041

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

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

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

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

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

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

C-018-041

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

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

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

## 12. Pacific Street Interchange Design Option

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

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

**PREAMBLE**

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

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

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

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

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

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

- C-018-041
- To preserve and enhance the recreational, conservational and educational habitat of the UW Botanic Gardens in particular the Washington Park Arboretum;
  - To allow for the efficient and effective management of construction projects included in the University's Capital Improvement Program for the Seattle campus; and
  - To preserve the ability of the University to meet current and future development needs.

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

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

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

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

C-018-041

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

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

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

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

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

Respectfully submitted,

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

Passed by the UW Faculty Senate, 26 October 2006



# City of Seattle Department of Neighborhoods

Bernie Matsuno, Acting Director

Gregory J. Nickels, Mayor

October 18, 2006

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

Members

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

C-018-042  
Scott Frosaker  
Eric Larson  
Dave Eckerl  
Pat Cowen  
Chris MacKenzie  
Neal Lessenger  
Adele Sefrioui  
Matthew Stubbs  
Geoffrey Newman  
Kelsey Emery

Alternates

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

Ex-Officio Members

Bill Louie - DON  
Meresa Doherty - UW

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

Mr. Krueger,

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

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

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

Thank you for considering our comments.

Sincerely,

Matt Fox, Co-Chair  
CUCAC

Danny Kraus, Co-Chair

cc: Mayor Greg Nickels  
Seattle Councilmembers

## PROPOSALS ON SR520 REVIEW TO THE SEATTLE PLANNING COMMISSION

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

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

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

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

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

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

the six-lane alternatives.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Chris Leman, Chair  
No Expansion of SR520 Citizens Coalition  
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85 E. Roanoke Street  
Seattle, WA 98102-3222

C-018-062

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

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

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

### **RTID CERTAINLY WOULD CONTRIBUTE FUNDS TO A FOUR-LANE SR520**

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

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

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

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

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

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

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

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

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

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

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

C-018-063

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

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

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

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

Respectfully submitted by

Chris Leman, Ph.D.  
Chair, No Expansion of SR520 Citizens Coalition  
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85 E. Roanoke Street  
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October 12, 2006

**From:** [John V. Fox](#)  
**To:** [SR 520 DEIS Comments;](#)  
**CC:** [Ziegler, Jennifer; tim.ceis@seattle.gov; sally.clark@seattle.gov; richard.conlin@seattle.gov; david.della@seattle.gov; jan.drago@seattle.gov; jean.godden@seattle.gov; nick.licata@seattle.gov; richard.mciver@seattle.gov; tom.rasmussen@seattle.gov; peter.steinbrueck@seattle.gov;](#)  
**Subject:** Our comments on the SR520 DEIS - please review and include - and say "NO" to Pacific Street Interchange Option  
**Date:** Tuesday, October 31, 2006 11:34:59 AM  
**Attachments:**

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Comments on DEIS for 520 from the Seattle Displacement Coalition

October 31, 2006

Paul Krueger WSDOT  
414 Olive Way, Suite 400  
Seattle, WA 98101

Re: Comments on the SR520 DEIS

The Seattle Displacement Coalition is a 29 year-old city-wide coalition of community, housing, church, and social service organizations committed to the preservation and expansion of low income housing opportunities here in Seattle. We also have assisted numerous neighborhood groups over the years responding to public and private developments that threaten both the physical and social character of those areas. Our organization is responding to this specific transportation issue - SR520 expansion - because all six-lane alternatives especially the Pacific Interchange Option pose such a significant danger to Seattle's neighborhoods - their liveability and affordability.

c-019-001 | We simply cannot afford to move forward with any of these six lane options given the significant unavoidable adverse impacts that accompany each of them - especially the Pacific Interchange option that will so threaten valuable wetlands, create extraordinary unmitigated noise and visual blight, air pollution, and spill a level of traffic into the University District that cannot be reasonably managed or

c-019-001 | mitigated. Gridlock will be the inevitable result. The DEIS fails to adequately consider these direct, indirect, and cumulative impacts associated with any of the six lane alternatives. It also fails to give full consideration to the broad range of four lane alternatives that when coupled with bike, transit, TDM, and other mitigation measures could reasonably address traffic demand along 520 for decades to come.

c-019-002 | At the core of this debate over options for 520 is a rather fundamental issue - the six lane options and their designs especially the Pacific Street Interchange are all geared not simply to absorb manageable and reasonable levels of growth (while trying to help shift more commuters from cars to buses and other modes) through that corridor, they are consciously designed to accommodate expanded and accelerated rates of growth both on the Eastside and in downtown Seattle.

The growth first - pro-density- pro-displacement crowd - see expansion of 520, a waterfront tunnel, mercer expansion, all these so called improvements as necessary in order to feed the downtown highrise growth machine which is not sustainable either in terms of Seattle or the region's ability to accommodate it - not without enormous unavoidable impacts on affordability of our housing and our city and region's physical environment. Our city cannot add enough housing to accompany the runaway growth and that translates into ever escalating housing costs and displacement. More is better....it fuels growth... more office space and bio-tech in downtown - feeds our property values - feeds our wallets - and feeds the gentrification displacement beast that is destroying our city and increasing the ranks of the homeless and driving up housing cost for all of us.

Further, when half the new downtown office workers choose to live on the eastside - they will continue to demand more and more freeway lanes such as the six lane 520 options to get them into downtown. The cost of moving this increasing number of commuters who live farther and farther out on the Eastside to and from their jobs in downtown is enormous and simply unsustainable. Nor can we afford a regional growth model premised on downtown Seattle continuing to absorb 60 percent of the regions office growth. Expanding 520 to six lanes merely fuels these unsustainable trends. The DEIS gives no consideration to these population, land use, and housing effects. Nor does the DEIS give consideration of other regional growth models such as a poly-centered approach to growth that would more evenly distribute growth among all activity centers in the region thereby obviating the need for more freeway lanes and dovetailing with more cost effective and environmentally sensitive approaches for 520.

c-019-002 | We cannot afford the cost of adding these freeway lanes in terms of real dollars and more importantly we cannot afford the devastating impacts that will result on our neighborhoods - as is evidenced by the extraordinary and outrageous intrusion the Pacific Street Interchange option will have on our wetlands and our neighborhoods. It translates directly into a level of noise, visual, air pollution that cannot be mitigated and will significantly reduce our quality of life. And it increase and only fuels our dependency on the automobile. The 520 DEIS fails to give any consideration to these longterm and cumulative effects.

c-019-003 | In closing, our members that represent neighborhoods from across this city categorically reject the six lane options especially the Pacific Street option. We urge you to do your job and fully assess the negative impacts accompanying these alternatives and give much more consideration to four lane options and other options that don't simply fuel unsustainable growth in Seattle and the region. Please include our comments in the final DEIS for 520.

Thank you.

John V. Fox Coordinator  
Seattle Displacement Coalition  
206- 632-0668  
4554 12th NE  
Seattle, Wa. 98105

**From:** [Dee Arntz](#)  
**To:** [SR 520 DEIS Comments;](#)  
**CC:**  
**Subject:** Comments on the SR520 Proposal for Lake Washington  
**Date:** Tuesday, October 31, 2006 9:50:48 AM  
**Attachments:** [WSDOTComments on DEIS Proposed Bridge.doc](#)

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Mr. Kreuger,

C-020-001

Attached are the comments of the Washington Wetlands Network on the proposed alternatives to replace the sr520 bridge. A major point in these comments are the many fundamental errors in the DEIS treatment of wetlands. If these problems must be corrected and the alternatives reanalyzed. If not, the DEIS as it stands is a dishonest document that cannot serve to give public officials the straight facts to consider the alternatives. Unfortunately, the DEIS now reads like a public affairs piece for the Pacific Street Interchange.

All the 6 lane alternatives are destructive to the environment, however, none more so the the Pacific Street Interchange. With the flawed data and analyses now in the DEIS, it is made to appear that this alternative is environmentally friendly and no substantial damage will done to the wetlands, Marsh Island, Foster Island and the Arboretum. It is not possible to mitigate rare lake fringe wetlands in some other location in the watershed. The damage must be minimized and not maximized with false promises.

Dee Arntz

Chair, Washington Wetlands Network

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## Washington Wetlands Network (Wetnet)

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

From: Dee Arntz, Chair, Wetnet  
RE: **Comments on DEIS Proposed 520 Bridge Alternatives**

c-020-001 | The purpose of the Draft Environmental Impact Statement (DEIS) is to provide a “thorough” and “objective” identification and analysis effects of the project. This DEIS does not meet either requirement. Many analyses are not included and a great deal of important detail is left out in the DEIS and especially in the Summary. A great deal of key information is buried in the many Appendices. While the inclusion of Appendices is appropriate, it is not appropriate to publish a DEIS *sanitized* of critical environmental impacts.

I believe the information presented below demonstrates that the negative environmental impacts of the project, especially the Pacific Interchange, are greatly underestimated and downplayed. In fact, it appears that one objective of this DEIS was to mislead the Seattle City Council and the public about the real destruction and degradation of wetlands.

My expertise is in wetland protection and advocacy. I started the Washington Wetlands Network in 1990 and this award-winning organization continues to be active in federal, state, and local policy discussions. Also, I graduated from the first University of Washington Wetland Science and Management Certificate Program. So while I have many concerns about the assumptions and analyses in the Draft Environmental Impact Statement, I am confining the majority of my comments to the destruction and degradation of wetlands and the lack of a credible compensation plan.

I support an option that respects rare lake fringe wetlands, and reduces impacts on Marsh Island, Foster Island and the Arboretum. This is certainly not the Pacific Street Interchange. The Pacific Interchange option is a nightmare from the grand old days of unbridled freeway construction, 1950's and 1960's. It has no place in Seattle in the 21<sup>st</sup> Century.

### c-020-002 | **Wetlands**

Overall, the DEIS and its technical appendices consistently minimize the impacts of all options, but particularly, the Pacific Interchange option. On page 3-20 the magnitude of the wetland impact is described –Foster Island, Marsh Island, Union Bay, and the Arboretum. Almost all the wetlands around Lake Washington have been destroyed for development. Now the six lane options will sacrifice most of the rest. The wetlands to be compromised should be characterized as Category I not Category II (see below). Also, the Pacific Interchange Option does not take seriously the abjuration to avoid and minimize as required by law. The Pacific Interchange is not necessary and therefore, can be avoided with an option that supports wetlands preservation and fulfills transportation needs.

c-020-002 | After detailing the important functions of existing wetlands Part I, we are told that these impacts will be mitigated somewhere else. Sadly, wetlands are not like furniture that you just pick and move without consequences. There are consequences that are not fully analyzed. Several of these wetlands are described in the DEIS as “rare”. Also, many wetlands such as those cited in the Fairweather Creek Basin and the Cozy Cove Basin can be upgraded and restored. So can the “impassable culvert” in the Yarrow Creek Basin.

▪ **The DEIS relies on old regulation and policy standards.**

The analysis relies on 1993 City of Seattle regulations even though in 2004 the new regulations that substantially revised wetland categorization were available. City of Seattle Municipal Code (25.09.160) should be applied as City standards for Wetlands Classification and Buffer widths. This would require 200-foot buffer widths for these high value wetlands instead of the 50-foot buffer widths listed in Exhibit 12. Therefore all buffer widths must be revised to show a four-fold increase. Exhibit 13, impacts are given as Category II-IV although the Seattle segment is Category I.

c-020-003 | ▪ **Important discrepancies and inconsistencies occur between the DEIS text and the Technical Appendix E.**

- For example, in text Union Bay wetlands are described as Category II wetlands. This statement contradicts Exhibit 26 in Appendix E-Ecosystems Discipline Report, which identifies these as Category I. This is a huge discrepancy.
- In Appendix E, on pages 73-74, 1600 to 1800 pilings will impact wetlands, but this impact is downplayed. Most puzzling it that the 4-lane alternative has more impacts than the 6-lane alternative
- In Appendix E, Wetland impacts from bridge columns shown in Exhibit 10 for Portage Bay are calculated incorrectly. The impact should be 2,826 feet.
- Exhibit 13 in Exhibit E underestimates the wetland impacts from shading compared to Exhibits 7 and 11 for the original 6 lane alternative (1.3 vs. 6 acres), Pacific Interchange option (1.6 vs., 4.78 acres) and the second Montlake Bridge (1.3 vs. 6.26 acres) claiming that only 20% of shaded wetlands count as impacts. On what basis?
- Exhibit 6 Appendix E Addendum to Ecosystems Discipline Report (EDR) underestimates wetland impacts compared to Exhibit 7 and 11 and Exhibit 23 in the EDR. Also, there are serious inconsistencies between this exhibit and other exhibits for the original 6-lane alternative (6 acre vs. 6.94 acres), Pacific Interchange option (5.3 acre vs. 8.05 acres) and the second Montlake Bridge option (6 acre vs. vs. 7.05 acres).
- Page 51 Appendix E EDR. The proposed 15 storm water cells attached to the bridge columns are not considered direct wetland or lake impacts only shading impacts. In fact, 12 of the 15 cells will displace existing wetlands to create storm water facilities. Maybe 3 of these cells might be considered open water. Also, I see no documentation that this design, which is experimental, actually can effectively treat storm water. It should definitely not be considered wetland enhancement.

c-020-004 | ▪ **Temporary Construction Impacts of four to five + years on wetlands must be accounted for in any compensation plan.** They are not.

C-020-005 | ■ **Estimates of Indirect effects on wetlands due to additional transportation projects are mentioned as possible.** However, no information is presented in the draft EIS main text as to the potential impacts

C-020-006 | ■ **Statements about shading impacts are inconsistent and not substantiated by the scientific literature.**  
In discussing Union Bay wetlands, shading impacts by new bridges are considered to be less than existing bridges and structures. However, no citations from scientific literature are given to back up this conclusion. The proposed bridges may be higher, but they will also be much wider which would cause different shade impacts and patterns not necessarily less impact. Overall, the potential effects are not treated in a scientific manner and quantified for comparative analysis. There are no citations to indicate what standards were used, if any. As currently written, these statements should have no more credibility than a hunch.

Further, in Appendix E, Exhibit 10 claims that only a small portion of the shading impacts are considered as impacts for the project. No reason is given.

C-020-007 | ■ **Throughout the document, important negative environmental impacts are minimized or dismissed.** Page 4-32 DEIS the statement is made “the alternatives and options would not negatively affect the quality of life in the project area; in fact, they would increase long term improvements...” This sentence leaves out the negative impact on wetland services and the sheer enormity of the PSI Alternative. Further, the **Key Points, Ecosystems**, there are 4 positive changes and 2 negative. On Page 4-41, Exhibit 4-17 is in error as discussed above. The positive contribution of higher bridges is vastly overblown. The real negatives of the Pacific Street Interchange are given in the last paragraph, Page 5-7 in the DEIS-views from the Arboretum, additional ramps increase the width through Foster Island, two sets of support columns for the Union Bay would encroach on upon existing broad views etc. These impacts are devastating. How can impacts such as these be considered minimal environmental impacts?

On Pages 5-42 through 5-49, the minimizing begins.

- Effects would be fully mitigated to comply with applicable laws and with WSDOT’s policy of causing no net loss of wetland functions and values. This statement is not substantiated in the DEIS nor by historical studies.
- Further, the DEIS states that “compared to the 4 lane alternative, the 6 lane Alternative would be only *slightly* more negative effects because of the larger footprint. This is a value statement that I do not share and don’t believe is substantiated.
- Wetlands – The project has been *designed to avoid and minimize wetland effects wherever possible*. What does that last phrase mean? The DEIS does not document avoidance and minimization especially for the Pacific Street Interchange alternative. This is another case of believing that saying something makes it so. As documented above, all the wetland and buffer impacts have been miscalculated.
- “The Pacific Street Interchange option would have the *smallest shading effect*.” This is another assertion without adequate documentation.
- Page 5-47, DEIS, another case of using language to mislead the reader. The area under the center of the bridge would still be *relatively shaded*, but areas near the edges would *probably* support well-developed plant communities...

- Page 5-48, “The project would reduce the availability and quantity of wetland habitat for invertebrates, amphibians, birds and mammals and would displace a beaver lodge near Foster Island. *However, the area affected is small, and mitigation measures (as described above) would help offset the losses.* Small compared to what. The whole lake; the remaining wetlands?
- The three mitigation measures discussed on Page 5-49 are vague. At this point, the DEIS allows destruction without demonstrating a plan to mitigate.

C-020-007

C-020-008

- **There is no substantive discussion of compensatory mitigation. The document provides only empty promises.** As the findings of the National Research Committee on Mitigating Wetland Losses (2001) concludes that the record of Section 404 of the Clean Water Act in contributing toward the overall objective of restoring and maintaining the quality of the nation’s waters,” is not at all well, and, typically, not at all.<sup>1</sup> Important findings are:

- **Landscape position** of wetlands is critically important to the way in which they function whether naturally existing or restored or artificially created.
- The best way to improve compensatory mitigation results is **to reduce the reliance on it.**
- Chair, Dr. Joy Zedler, and several committee members found that the mitigation program has been fostering a **net loss of approximately 80 percent of wetlands.** The results were published in an article in the National Wetlands Newsletter in 2001.
- **Even with improved compliance, loss of wetlands functions will occur.** In the studies they examined, the authors found “...that only 21 percent of the mitigation sites met various tests of ecological equivalency to the functions lost. These replacement wetlands ranged from 0-67 percent functionality. The compliance rate for these same studies ranged from 6 to 100 percent.”
- **Mitigation banks, the most recently cited panacea for wetland destruction, also have high failure rates.** A study recently completed in Ohio rebuts the widely held assumption that simply pushing more mitigation-to-mitigation banks will improve mitigation success. The study by staff of the Ohio EPA found that “...of the 12 banks assessed in Ohio, 3 were mostly successful, 5 were successful in some areas but failed in other areas, and 4 were mostly failed.” And “[o]f the bank area assessed (nearly 400 ha), approximately 25% was not ‘wetland’ but was primarily shallow unvegetated pond; of the remaining ‘wetland’ acreage, approximately 25% was ‘poor’ quality, 58% percent was ‘fair’ quality and 18% was ‘good’ quality.....” This led the authors to conclude “Too often, mitigation banks have simply meant more acres of poor quality wetland restoration than a comparable, small individual mitigation site.”

The enforcement of permit for compensatory mitigation is seriously deficient. The Corps fails to ensure that compensatory mitigation requirements are met. The 2005 U.S. Government Accountability Office (GAO) Report on Compensatory Mitigation Oversight confirms that the Corps fails to ensure compliance with compensatory mitigation permit requirements.<sup>2</sup> The GAO Report examined 249 permit files across seven Corps districts and

<sup>1</sup> National Research Council. Compensating for Wetland Losses Under the Clean Water Act. 2001.

<sup>2</sup> U.S. GENERAL ACCOUNTING OFFICE, PUB. NO. GAO-05-898, WETLANDS PROTECTION: CORPS OF ENGINEERS DOES NOT HAVE AN EFFECTIVE OVERSIGHT APPROACH TO ENSURE THAT COMPENSATORY MITIGATION IS OCCURRING (2005) [hereinafter 2005 GAO Report].

concluded that: 1) while the Corps identifies monitoring reports and compliance inspections as its two most important tools for ensuring mitigation compliance, its guidance on the use of these tools is vague, inconsistent, and weak; and 2) the Corps fails to systematically require and review monitoring reports, conduct compliance inspections, and take enforcement action to ensure compliance with compensatory mitigation requirements.

C-020-008

Based on the studies cited above, no public official can in good conscience accept the glib assurances of compensation. Experience shows that these will not be met. The most reliable way to maintain the few high quality wetlands that remain is to avoid and minimize as required by law. The six lane alternatives as structured especially the Pacific Interchange do not avoid or minimize. By the way, putting vegetated lids over the highways is not mitigation for wetlands and water quality impacts.

I do not believe that the exaggerated benefits and minimized costs, both financial and environmental, of the Pacific Street Interchange justify its selection as the preferred alternative. For heavens sake, the PSI option requires a separate bridge that will directly impact Union Bay (wetland values, Page 3-29 DEIS) Marsh Island and degrade Foster Island and the Arboretum. These impacts are briefly mentioned on Page 3-24 DEIS. Also, the fact that the new interchange is on WSDOT land does not obviate environmental responsibilities. On Page 3-29 DEIS, the evaluation of the PSI Option is discussed. The statement that “equally important is WSDOT’s desire to minimize filling and shading of the wetland, aquatic and shoreline habitats in the Arboretum and Union Bay” is not credible. The only way to achieve this objective is to not do it at all.

There is a tendency in this DEIS to believe that saying something makes it so. It appears that authors think by repeating their concern for the environment on as many pages as possible that will make it so. It is clear from other sections of the DEIS that the only good reasons are economic reasons. On Pages 4-21 and 4-22, the statement is made “the six lane alternative would provide more economic benefit than the 4-lane alternative because it would be much more effective in moving people through the SR520 Corridor.” While this is true, there are seven 6 lane alternatives. Each has its own negative impacts and the PSI has the most.

C-020-009

### **Financial Considerations**

The six lane alternatives are all more costly than the 4 lane and the Pacific Interchange is the most expensive of all. Additional cost of the PSI alternative in Seattle:

- 26.8 acres of land to be acquired vs. 14.1 for the 6-lane alternative.
- Page 8-11, Exhibit 8-8 Construction Duration (1) the Union Bay Bridge adds 24 month, but the exhibit aggregates the PSI option with the “West Approach to the Evergreen Point Bridge.” So there is no way of calculating the added time for the Pacific Street Interchange. How very convenient! And designed to obfuscate.
- Comparative costs are lumped and given in ranges in the Executive Summary on Page ES1-33. So it is impossible to distinguish the costs by option.

C-020-010

### **Tone and Style**

I imagine much of the impetus for this option is also the very emotionally tinged language used to both discuss the present problem and hype the “preferred” alternative. For example, in the Executive Summary:

- Page ES1-2 “the Evergreen Point Bridge and the adjoining stretches of SR 520 are *choked* with traffic”;

- Page ESI-5, “during the peak traffic period, this trip takes an average of 13 minutes.” This statement seems to imply outrage and horror. However, that doesn’t sound too bad when it takes that long or longer to get from Evanston and 62<sup>nd</sup> Street to the Bartells on 85<sup>th</sup> Street.

Yes, there is traffic. There are also stretches of I-5 between Seattle and Everett and even on North 85<sup>th</sup> Street that are chocked with traffic just about every day. So do we decide to use the construction solution as in the era of the 1950’s and 1960’s, perhaps a double decked I-5? Of course not. Such a solution is ludicrous and so are the excesses of some of the six lane alternatives, especially the PSI Alternative.

To sort out the real consequences of each alternative, there should be a grid comparing: (1) the alternative, (2) the cost, and (3) environmental impacts as corrected. Also, in order to make a reasoned conclusion, there needs to be data incorporating transit and conservation options. What about trip management? What about the impact of a toll?

Deirdre Arntz  
Chair, Washington Wetlands Network

**From:** [Chris Leman](#)  
**To:** [SR 520 DEIS Comments;](#)  
**CC:**  
**Subject:** Comments of the No Expansion of SR520 Citizens Coalition on the draft SR520 EIS  
**Date:** Wednesday, November 01, 2006 2:42:20 AM  
**Attachments:**

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The No Expansion of SR520 Citizens Coalition offers the following comments on the draft SR520 EIS.

c-021-001 | Format. While the EIS itself is attractively designed, we regret that there is inadequate integration between it and the various appendices that contain much of the data and analysis. The EIS text is often too general to be useful, with the actual data and analysis buried in the appendices. The appendices often include updates that are poorly integrated with the material that precedes them, making it unnecessarily difficult to obtain the overall picture.

c-021-002 | Global warming impacts are not adequately assessed. Increasing the number of SR520 bridge traffic lanes will cause more driving, and hence produce more greenhouse gases. Keeping SR520 at four lanes is the most important single step that our region can take to reduce its future impact on global warming.

c-021-003 | Construction-related traffic is not adequately analyzed and disclosed. SR520 construction will cause huge impacts from truck noise, vibration, dust and pollution, and traffic safety and tie-ups--and building the six-lane alternatives (especially the Pacific Street Interchange) will cause at least a year more of these impacts than the four-lane alternative. There will be tens of thousands of additional trips by fully laden dump trucks, concrete trucks, and other heavy vehicles on City streets. The EIS must provide quantitative measures for this expected truck traffic and its impacts.

c-021-004 | The more comprehensive noise analysis that is needed will show that the six-lane alternatives have noise impacts that are unacceptable yet cannot be mitigated. A full comparison of the noise impacts of the six-lane alternatives versus the four-lane alternative will show that the six lane alternatives cause more 66+ dBA noise above the first floor than the four-lane alternative. Also, for noise impacts that remain under 66 decibels but are still disturbing to the average resident or business, the six-lane alternatives will cause more noise

C-021-004 | increases for more people than the four-lane alternatives. The higher noise from the six-lane alternative than the four-lane alternative will be felt by all neighborhoods that now experience noise from SR520, including not only Montlake, Portage Bay/Roanoke Park, Capitol Hill and Eastlake, but also Madison Park, Laurelhurst, and the Eastside neighborhoods.

C-021-005 | The EIS fails to acknowledge that expanding SR520 to six lanes by adding two HOV/transit lanes will increase single occupancy vehicle traffic. The six-lane alternatives would in fact increase single-occupancy vehicle traffic. because the car-pools and buses that move to the newly built HOV lanes would free up room on the existing lanes, which would be filled by single occupancy vehicles. For a systematic argument that building new HOV lanes encourages single occupancy driving, undermines transit, and harms the environment, see the report on Rethinking HOV which is included in the section, "Building HOV Lanes Doesn't Work," of our web site, [www.noexpansionofSR520.org](http://www.noexpansionofSR520.org). We do not help transit by making it easier to drive alone, as the six-lane alternative would do.

C-021-006 | Whereas WSDOT's EIS shows the six-lane alternatives with lids at Montlake and Roanoke , the four-lane alternative is shown without these lids, and hence the EIS erroneously claims that four lanes are noisier than six. The EIS did not respond adequately to the City of Seattle 's request in resolution 30777 that WSDOT "pursue all possible measures that promote neighborhood livability with the 4-lane option under study by WSDOT as well as the 6-lane option." It would be entirely feasible to put these same lids on the four-lane alternative, but unfortunately the EIS does not do so. The EIS should re-analyze the four-lane alternative with the lids, because to do so would likely show that its noise impacts would be lower than for any of the six-lane alternatives.

C-021-007 | The EIS does not respond to the City of Seattle's request in resolution 30777 that WSDOT "develop policies that prevent the conversion of HOV lanes and rapid transit lanes to general purpose traffic," and that it "design safety shoulders so that future conversion to traffic lanes is not feasible." Throughout the country, HOV and transit lanes have, once built (and sometimes even on the day they opened) been converted to general purpose lanes; and highway shoulders have been converted to traffic lanes (east of the Lake, the SR520 shoulders have for years been used as HOV lanes, and now the I-90 bridge will be restriped to convert shoulders to create two additional traffic lanes). Without measures to prevent such conversions, the SR520 traffic models and the environmental analysis that depend on them are not worth the paper they are written on, because once built, SR520 is likely to have much more general purpose traffic than was promised in the EIS.

C-021-008 | The EIS noise analysis is seriously misleading in claiming that noise impacts would be reduced under all the build alternatives, because it focuses on a relatively few specific locations that happen to now exceed 66 dBA. As one of many examples, see the statement on page 5-19 that "The noise situation would improve substantially if either of the build alternatives were built." A more accurate statement would be that "Noise walls will reduce noise somewhat for most locations with current noise levels in excess of 66 dBA, but over a much wider area, most locations whose current noise levels are beneath this threshold will experience higher noise levels, but less so for the four-lane alternative than the six-lane alternatives."  
from New York City

C-021-009 | As a SEPA document, this EIS should consider a broader range of noise impacts than just a threshold of 66 dBA at the first floor. The State Environmental Policy Act requires assessment of a broad range of environmental impacts, and as a SEPA document, this EIS is not bound to study only noise impacts that can be legally mitigated by federal funds. Many homes and businesses will suffer noise levels in excess of 66 dBA noise levels on upper floors. Many others will experience an increase in noise, even if the increase does not reach the 66 dBA level. Because federal noise mitigation funds are not allowed to be spent for interior residential or office uses above the first floor, or for noise below 66 dBA, it is all the more important to consider the full noise impacts of the various alternatives, because each alternative brings with it a certain level of noise that, because of the federal restrictions, cannot be easily mitigated.

C-021-010 | The EIS fails to propose a "congestion pricing" cross-lake toll level that ensures free flow at rush hour for the four-lane alternative. A rush-hour toll on both the SR-520 and I-90 bridges would manage congestion very well, as has been shown by studies already conducted by WSDOT and the Puget Sound Regional Council; the Mayors "green ribbon" commission also recently urged such "congestion pricing." Yet the EIS fails to study a scenario in which there would be tolls on both the SR520 and I-90 bridges. Because the EIS assumes a toll only on the SR520 bridge, the claim is that I-5 would become clogged as drivers take the free I-90 crossing, and therefore the SR520 four-lane alternative cannot work. But the Federal Highway Administration already recognizes SR-520 and I-90 as jointly constituting a single corridor, and for the purpose of analyzing SR-520 tolls, the EIS should have done so as well. When the SR520 EIS studies the four-lane alternative with congestion pricing tools on both SR-520 and I-90, it will show it to be free-flowing.

C-021-011 | The EIS analysis of the two tolling alternatives does not articulate their dramatically contrasting implications for transportation planning. The alternative

C-021-011 | of maximizing revenue would require drivers to pay tolls at all hours of the day, yet without requiring them to pay a higher rush hour toll. The true “congestion pricing” alternative that was not studied in the EIS could provide a lower or no toll during much of the day and hence take less total revenues from the driving public, but would during rush hour provide a toll high enough to ensure a free-flowing bridge, even with the four-lane alternative. With the maximum revenue tolling option, WSDOT would enter a vicious circle in which it would build and manage highways to bring in more revenue, not for the public interest. Choosing the revenue-maximizing toll alternative could cause WSDOT to overbuild SR-520 with one of the six-lane alternatives, while discounting four-lanes' lesser environmental and neighborhood damage and its fewer years of construction disruption.

C-021-012 | At various points, the EIS is incorrect in describing the Pacific Street Interchange as being community-generated. In fact, an interchange very similar to the Pacific Street Interchange was designed by WSDOT in the mid 1960s (forty years ago) as a part of what was then to be called the R.H. Thompson Expressway. The interchange, and the associated expressway, was de-funded in 1972 by Seattle voters, and was officially terminated in 1977 by the Seattle City Council. The major difference between what was rejected then and the current Pacific Street Interchange proposal is that the original WSDOT design would have been partly underwater.

C-021-013 | The more comprehensive noise analysis that is needed will show that the six-lane alternatives have noise impacts that are unacceptable yet cannot be mitigated. A full comparison of the noise impacts of the six-lane alternatives versus the four-lane alternative will show that the six lane alternatives cause more 66+ dBA noise above the first floor than the four-lane alternative. Also, for noise impacts that remain under 66 decibels but are still disturbing to the average resident or business, the six-lane alternatives will cause more noise increases for more people than the four-lane alternatives. The higher noise from the six-lane alternative than the four-lane alternative will be felt by all neighborhoods that now experience noise from SR520, including not only Montlake, Portage Bay/Roanoke Park, Capitol Hill and Eastlake, but also Madison Park, Laurelhurst, and the Eastside neighborhoods.

C-021-014 | The EIS fails to identify opportunities to reduce costs of the various alternatives. Gov. Christine Gregoire's Expert Review Panel has found the most likely cost of

C-021-014 | the Pacific Street Interchange six-lane alternative to be \$4.38 billion--\$1.59 billion more than the four-lane cost of \$2.79 billion. Governor Gregoire has asked the Expert Review Panel for ideas on how to reduce costs even below that of the current four-lane proposal, and it is regrettable that the EIS offers so little help in that effort, because in many cases a reduction in cost is also a reduction in environmental impact. For example, four lanes are less expensive to build, and can be built more quickly, thus producing a safer and more functional bridge more quickly than the other alternatives. In contrast, among the six-lane alternatives, the Pacific Street Interchange is the most expensive feature and would take the longest to build;. As another example, the Portage Bay Viaduct is proposed for seven lanes in even the four-lane SR520 alternative. Construction over Portage Bay is unusually expensive, and could be substantially reduced by reducing the width of the new viaduct;.

C-021-015 | The EIS should not assume that lanes, shoulders, and ramp geometry would be built to the full FHWA standards The EIS does not explore the possibility of waivers from the federal government,, without considering applications for waivers to reduce the size of lanes and shoulders and ramp geometry. Substantial reductions in all these measurements would dramatically reduce costs, and they should be studied in the final EIS or in a supplemental EIS.

C-021-016 | Transit share on SR520 with the current four lanes is excellent, and could be further enhanced if a future four-lane SR520 were provided reasonable and affordable transit improvements. The SR520 corridor is already the state's outstanding corridor for transit and HOV use, largely because single occupancy driving on SR520 is more constrained. The EIS exaggerates the transit-friendliness of the Pacific Street Interchange, and it fails to explore lower-cost, lower-damage opportunities for improving transit. Elimination of the Montlake flier stop actually degrades the bus opportunities for those who live or work south of the Montlake cut. They will have to walk much further to their buses, and without any real improvement in bus times. Centralizing the bus stops at the light rail station would assist a limited number of people who, in the absence of the Pacific Street Interchange, would simply walk another block or two between their bus and the light rail station.

C-021-017 | The EIS makes the four-lane alternative look bad by depriving it of simple, low-cost measures give buses priority over other motor vehicles. Conversion of one lane of the SR520 bridge to transit or HOV can be a part of the package, and it would be reasonable to convert the entire bridge to HOVs, buses, and trucks only at the peak period. This is a far cheaper and quicker way to achieve transit- and HOV preference than by construction. For the case for converting lanes and ramps to transit- or HOV-only see the report for the Chesapeake Bay

Foundation that I coauthored on Rethinking HOV which is available at [www.noexpansionofSR520.org](http://www.noexpansionofSR520.org).

C-021-018 | The EIS should explore whether there is any logical need for transit/HOV lanes on the SR520 bridge. So long as buses and car pools have an advantage in getting to and from the bridge, having their own separate lanes on the bridge may not be necessary. More results for transit can be achieved by relying on bus-favoring ramps and shoulders. When the I-90 bridge sank, bus service on SR520 improved rather than degraded, because WSDOT converted an I-5 shoulder to bus only, to make it easier for buses to get to and from the SR520 bridge.

C-021-019 | The more comprehensive noise analysis that is needed will show that the six-lane alternatives have noise impacts that are unacceptable yet cannot be mitigated. A full comparison of the noise impacts of the six-lane alternatives versus the four-lane alternative will show that the six lane alternatives cause more 66+ dBA noise above the first floor than the four-lane alternative. Also, for noise impacts that remain under 66 decibels but are still disturbing to the average resident or business, the six-lane alternatives will cause more noise increases for more people than the four-lane alternatives. The higher noise from the six-lane alternative than the four-lane alternative will be felt by all neighborhoods that now experience noise from SR520, including not only Montlake, Portage Bay/Roanoke Park, Capitol Hill and Eastlake, but also Madison Park, Laurelhurst, and the Eastside neighborhoods.

Sincerely,

Chris Leman, Chair  
No Expansion of SR520 Citizens Coalition  
85 E. Roanoke St.  
Seattle, WA 98133

University District Community Council  
c/o 4534 University Way N.E.  
Seattle WA 98105

October 24, 2006

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

RE: SR 520, Comment on draft environmental impact statement

Dear Mr. Krueger:

The University District Community Council ("UDCC") is a voluntary association of residents, businesses, and those who work in that part of Seattle that lies north of the Lake Washington Ship Canal, east of Interstate 5 south of Ravenna Boulevard, and west of 22nd Ave N.E. (but including both sides of it). It overlaps areas with University Park and the Roosevelt Neighbors Alliance. It is open to students at the University of Washington, faculty and staff and many attend its meetings. Both membership and Board meetings are open to the public and held regularly. The subject of SR 520 and its replacement has come up for discussion many times over the years and our membership has reached a consensus. It is set out in the first two sections of this letter.

Preferred Design

The UDCC has long supported repair and/or reconstruction of State Route 520 as necessary for safety purposes. If a new bridge is to be built, new capacity should be limited to "transit only" and bike lanes. Construction should occur within its existing corridor preferably within its existing right-of-way, and environmental impacts on the surrounding neighborhoods (north and south), the Arboretum, and the University of Washington should be mitigated to the maximum extent.

Unfortunately, the draft environmental impact statement ("DEIS") ignores our preferred alternative. The 4-Lane Alternative has no provision for "transit only" lanes, DEIS p. 3-8 thru 3-15, and the 6-Lane Alternative has two HOV lanes, but no transit only lanes, DEIS, pp. 3-15 thru 3-22. Transit only lanes differ from HOV lanes. Transit only lanes can be converted to rail usage; the transit authority can adjust transit only lanes (including directional flow) at rush hours and after major events to serve its convenience. HOV lanes are open to vehicles with two or more persons; legislation proposes to make HOV lanes open to anyone willing to pay a fee; Port districts and others have long campaigned to open HOV lanes for all trucks. Neither now or in the future will HOV lanes offer the flexibility or utility to rapid transit that transit only lanes do. The DEIS should have considered the "transit only" option.

The UDCC strongly opposes the Pacific Street Interchange Option. The DEIS ignores the University Community Urban Center Plan adopted by the City of Seattle after a lengthy neighborhood planning process. Appendix K, Land Use, p. 21 acknowledges that it violates this plan. It truly does. The neighborhood plan goals call for "improved mobility and access by public transportation to service, jobs, businesses, residences, educational opportunities, and other destinations, both within and outside of the UCUC [University District and campus planning area], including local shuttle." (emphasis added). The community and City government recognize that the University District is saturated with the traffic of privately-owned vehicles: the flow is

C-022-002 | almost constant during daylight hours on N.E. 45th St. Traffic is also heavy during extended peak hours on Roosevelt Way N.E. (southbound), and 12th Avenue N.E. (northbound), 15th Avenue N.E., N.E. 50th St., and Campus Parkway N.E.

Sound Transit anticipates building its RTA station in the vicinity of Brooklyn St. N.E. and N.E. 45th St. and establishing a "feeder" system with Metro. Under the "feeder system," until the 65th St. station is built, buses from the north, east, and west would go to the RTA station, rather than to downtown, except for a few express buses during rush hour. This will bring a large number of buses to the University District. Metro planners have said that the UDCC can expect to see the curb lanes of Brooklyn Ave. N.E. from N.E. 42nd St. to N.E. 47th St. reserved for transit use only, and that during peak hours, the curb lanes of N.E. 45th St. will have many more bus routes, buses, and so much added transit use that motorists will be effectively limited to the inside lanes. This will greatly diminish the street capacity for single occupancy vehicles.

The University Community Urban Center Plan set three major goals for the improving local streets: (a) complete the 'Ave' project to widen sidewalks and greenery, making the 'Ave' a place to stroll and shop; (b) bring the University and the University District closer together by reducing the bulkhead along the east side of 15th Ave. N.E., upgrading the streetscape along 15th Ave. N.E., improving the east-west pedestrian connection at N.E. 43rd, 42nd, and 41 St. St., etc.; and (c) reconnecting the University District with the waterfront along the Lake Washington Ship Canal by developing parks, orienting the streetscape to a campus like atmosphere and generally making it easier to cross N.E. Pacific Street on foot. Bicyclists also sought to alleviate the hazard at Campus Parkway on the north side of University Bridge, where cars make right turns directly in front of cyclists at the outside edge.

The Urban Center Plan envisions "mobility" as helping people go where they to within the University/University District by walking or cycling and to destinations outside the University District by public transportation. Heavy vehicular flows on streets impede pedestrian, e.g. at N.E. 45th St. and 15th Ave. N.E., during the hours before morning classes, twenty people may be stopped, standing on the corners waiting for the light to change, while three or four cars are making a left turn; intersections on Roosevelt Way N.E. and 12th Avenue N.E. south of N.E. 45th St. have push buttons designed to make pedestrians wait for a clearance. The Planing Committee recognized that students, other singles, and seniors have cars and use them for dating, hauling goods, getting to late night jobs where bus service is deficient, for recreation, and on the job (e.g. pizza delivery). However, their studies and experience showed that the street system can handle the anticipated traffic volumes off peak hours.

#### Pacific Street Interchange

C-022-003 | The Pacific Street Interchange clashes with this planning and the long standing efforts to promote public transportation and reduce use of private vehicles. It extols the Pacific Street Interchange as improving the local street network and in its appendices as "improving access to and from the University District." and "reliability." It will add a new connection to the I-5 express lanes and thereby to the exit at N.E. 42nd St. and 7th Ave. N.E. and increase traffic at N.E. 4th St. It will add so much additional traffic to N.E. Pacific Street that its intersection at 15th Ave. N.E. that the DEIS classifies it as "congested." (Level of Service E), DEIS p. 5-23.. That traffic has two main outlets/intakes: westward on N.E. Pacific Street south of the dormitories and thereby impede pedestrian crossings toward the canal front; and north-south on 15th Ave. N.E., setting up a divide between the U of W campus and the University District. Both are contrary to the goals of the Urban Center Plan and the best interests of the University District.

The Pacific Street Interchange will likely increase traffic on N.E. 45th St. and N.E. 50th St. When I-5 is congested at the Ship Canal Bridge --- which happens very frequently --- traffic going to the East side of Lake Washington will get off at N.E. 50th St. or N.E. 45th St. and head for Montlake Boulevard by way of the N.E. 45th viaduct. rather than use the left side off ramp to SR 520. Car and truck radios and routing devices built into late model cars will advise them to do just that to save time. Traffic that now goes over Portage Bay will instead use local streets through the University District and alongside University Hospital --- a poor trade-off. The Pacific

C-022-003

Street Interchange makes the Husky Stadium station a poor place to catch surface buses. The depressed roadway prevents bus pull-outs, and passengers have to walk up to a quarter-mile to the nearest station. As a result, passengers under the other alternatives might make connections at Montlake will instead go to the N.E. 45th St. Station. N.E. to catch surface buses. The transfer points are closer, and the University District Station will have a far better ambiance than waiting near a freeway like ramp. That will increase the bus traffic to the RTA station, and passenger pick-ups by family and friends.

The Pacific Street Interchange does irreparable damage to the University of Washington campus and to the Arboretum. It trisects the campus with Aurora-like arterials, it superimposes a freeway-style interchange with its concrete ramps and bridge over the water sports area on the South East Campus; and it takes almost 15 acres now devoted for educational purposes from the campus. It puts a major interchange in the Arboretum at Marsh Island, converts Lake Washington Boulevard (an Olmsted Boulevard laid out as a park drive) into a freeway access roadway, the only southern access to the Evergreen-Montlake Bridge in Seattle besides I-5; it takes many acres, overshadows more, and dominates the views looking northward as well as spewing noise and air pollution throughout. The University District grew up around the University Campus. It is the largest open space for District residents; it provides jobs for many others; and it is the center of learning for several thousand University students who live here and a beacon of education for many thousand more who attend lectures, concerts, and plays; and, of course, it draws droves of sports fans. Damaging the University campus damages the University District. The Arboretum exhibits the widest range of arboreal species anywhere in the Northwest in a very beautiful and educational manner. Our residents visit for recreation and prize its. The injury that the Pacific Street Interchange does to the Arboretum is a total disgrace. Many district residents and most of the UDCC board members would use much stronger terms.

*Ambiance -*

DEIS -Inadequate

A committee reviewed the DEIS have many questions that the DEIS and its appendices should answer, but have not done so yet::

C-022-004

Traffic ---

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

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

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

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

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

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

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

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

Will the added traffic on I-5 express lanes increase the noise levels on 7th Avenue N.E.

south of N.E. 45th St. If so, how much?

C-022-004 | The DEIS has no studies on the increased noise on University hospital? What impact will it have? please consider the cumulative noise levels adding in the noise from N.E. Pacific Street, which would be brought closer to the medical center.

C-022-005 | Pedestrian mobility ---

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

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

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

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

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

C-022-006 | Parking ---

Where will the cars prompted by the "connectivity" that the Pacific Street Interchange envisions be stashed?

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

C-022-007 | Displacement ----

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

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

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

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

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

Thank you for the opportunity to comment. We would appreciate receiving a response to

the questions posed.

Yours truly



Matt Fox  
President



# Queen City Yacht Club

2608 BOYER AVE. EAST SEATTLE, WASHINGTON 98102 (206) 709-2000

RECEIVED

October 25, 2006

OCT 23 2006

SR 520 1:40 pm KK  
PROJECT OFFICE

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

RE: Queen City Yacht Club Response to SR 520 DEIS

Dear Mr. Krueger:

We thank the Department of Transportation for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the 520 Bridge Replacement Project.

We would like to comment on a number of items in this report that we perceive as impacting our property and comment further on impacts to the environment of Portage Bay. We understand that you have not yet designed this project to any great extent and we hope that you will take these comments into consideration in your design in order to minimize impacts caused by the project.

As discussed in this letter, the Project may have very serious impacts on the Queen City Yacht Club. If our concerns are considered in moving forward with the design however, we believe that many of those impacts could be materially reduced, if not eliminated, without adverse impact on either the cost or the functionality of the Project. Ignoring our concerns may have its own cost implications on the Project. We strongly encourage the Project team to work with us as the design progresses so that the Project can move forward in a manner that is maximally satisfactory to all.

1. Background. Queen City Yacht Club was founded more than 90 years ago, in 1916, making it one of the oldest civic organizations in the City of Seattle. The founding premise was that it was a club for boaters of moderate means, who wanted the sport of boating without unnecessary frills. That attitude has prevailed to date.

Our Club is actively involved in numerous civic activities of importance to the community, as well as providing boating opportunities, social events and recreation for our members and their families. Today we have more than one thousand members.

In 1934, Queen City Yacht Club was able to purchase the property on Portage Bay at 2608 Boyer Avenue East. This unique property has been integral to the growth and development of the Club. The Club's property is irreplaceable, because in addition to owning the uplands, we own the submerged lands on which our moorage is built. These conditions would be difficult if not impossible to recreate anywhere in the Seattle area.

Our Portage Bay facility consists of our main clubhouse, landscaped grounds, paved parking lot and three docks containing 230 mooring slips. The clubhouse is a three story building containing approximately 9800 square feet of improved interior space. It was constructed by our members in the 1930's. In 1999, our members raised more than two million dollars in pledges from our membership to fully renovate the Clubhouse.

Our 230 slip moorage facility was largely built by our members. Our members perform almost all of the maintenance on the moorage. The moorage facility is one of the Club's most significant assets. It not only generates annual moorage rental revenue, but is a significant recruiting incentive for new members to join our club. The moorage at Queen City is known area-wide, as one of the best deals in boating.

Queen City Yacht Club is a non-profit organization which devotes its resources to serving the needs of its members, and providing boating education to the young people in our community. In order to meet its annual expenses, the Club depends upon the revenue obtained from dues from current members, revenue generated by moorage, and the revenue derived from attracting new members. The loss of any portion of our facilities caused by your project will have a severe and material impact on the survival of our organization. The impact from loss of use during the construction of your project could similarly hurt us. Thus we are most concerned about the amount of our property that the Project will require, and particularly its impact on Dock 3, our parking, and the clubhouse.

What we can see in your plans is that in each scenario you have moved your bridge anywhere from sixty to ninety feet north of its present alignment, which moves it directly onto and over our property. This portends the potential loss of our southernmost dock (Dock 3), a portion of our parking lot at least during construction, and a permanent impact on our facility by having the bridge nearer, if not over, our facility. A permanent loss of Dock 3 and significant portions of our parking lot will wreak havoc on both our immediate and long-term finances, and will permanently cripple our ability to regenerate membership which is vital to our long term survival.

2. Consideration of Other Alignments and Properties. It appears to us that significant vacant or less-developed property lies to the south of your proposed alignment all the way from the west shore of Portage Bay to Interstate 5. However, the DEIS does not appear to give any consideration to an alternative alignment to the south, which could use that vacant or less-developed property and spare the Club's property, particularly Dock 3. If a more southern alignment has been considered, the DEIS does not disclose what specific consideration was given and why it is not presented as an alternative in this report.

The DEIS does comment on a desire to "straighten" the portion of the roadway that crosses Portage Bay. However, the diagrams on page ES1-14, suggest that the roadway jogs north at the Queen City Yacht Club, and would be straighter if the roadway were moved to the south, instead of to the north. In any event, the absence of assessing the impacts caused by the decision to move the roadway northward seems to ignore the weighing and balancing process that should be occurring at the DEIS stage.

We ask the State to remember, that you are building the Project in an urban environment where curves and alignments are frequently impacted by the need to deal constructively with project impacts. If there are benefits to the road alignment from it being pushed further north as you propose, those benefits should be compared to the cost and impact, including the impact that by potentially taking Dock 3, the Project may imperil the continued survival of the Club. The public and decision makers should be the ones to decide which impacts are most significant and which impacts should be avoided. But without the information, they can't do so.

The report also does not discuss what alternatives may exist to narrow the bridge at Portage Bay to avoid or lessen the impacts to our Club and to the environment. Is it essential to have full ten-foot shoulders at this location? It appears from the diagram on page ES1-14 that the east and west roadways are separated by some number of feet at the point of the Queen City Yacht Club. Is that truly necessary? Why? Because moving the Project even a few feet to the south could have the effect of preserving Dock 3, it is critical to the Queen City Yacht Club that there be a full consideration of all the alternatives that could move the alignment further south.

The assumed bridge alignment described in your report does not consider whether the existing alignment and right of way of the bridge could be utilized as the permanent alignment for the new bridge by the creative use of traffic detours and construction staging during the construction of the Portage Bay portion. Again, if that would be possible it could result in the maintenance of Dock 3, with significantly lower adverse impacts on Queen City Yacht Club.

C-023-001 | We do not understand why a decision to move the roadway to the north by 60 feet, which clearly causes such damage, is necessary or desirable and see no discussion of the relative value impacts you considered in reaching this decision. Again, because of the lack of detail in your report, we cannot tell what will occur beneath the bridge and whether you intend to pursue design considerations that will restore our facilities after completion of your project, thus mitigating the impacts of the Project on our use. We certainly urge you to do so, and will be willing to work cooperatively and creatively with you to minimize the long-term impact on Queen City Yacht Club, even if the construction impacts are necessarily more significant.

C-023-002 | 3. Actual State Land Needs. The DEIS itself seems to suggest that the Project intends to take all of our Dock 3 lands, although all that may be needed is a construction easement, particularly if the final design occupies a smaller footprint and is located further south. See, page ES2-47. Appendix K, pp. 59-66 is not much more enlightening. We urge the Project team to very carefully analyze whether it can get by with only a construction easement, and to engage Queen City Yacht Club in discussion on how we can access our property during construction and thereafter. As we explained above, a blanket taking of Dock 3 guts the Club's ability to generate revenue and threatens our existence. It is essential that the Project approach the designation of the area to be acquired carefully and with a full dialog with us. Additionally, the report fails to analyze and distinguish the state's actual land needs for construction purposes, as well as its actual needs for land acquisition in perpetuity. The report does not appear to consider or justify a partial construction taking, either, nor has it engaged us in discussions as to how we can access this northernmost portion of our property during construction and thereafter. Further, the report does not consider the impact of its taking on the Queen City Yacht Club's ability to rebuild its dock, or in the alternative, gain access to its property north of the construction zone during the Project.

C-023-003 | 4. Irreplaceable Property. The report's recommendation that the state condemn the Yacht Club's property fails to consider that this taking eliminates an irreplaceable piece of fee-owned aquatic property, one of the few parcels of lake bottom remaining around the Portage Bay, Lake Union and Lake Washington areas that is not encumbered by a DNR lease. Few, if any, options for replacing this invaluable land exist for Queen City Yacht Club. The report fails to consider less intrusive options such as taking DNR parcels of land to the south and positioning the bridge in that direction.

C-023-004 | 5. High Revenue-Generating Property versus Lesser Revenue-Generating Property. Additionally, the report fails to consider the overall economic impact of taking a high revenue-generating piece of property over lesser revenue-generating properties, and even non-revenue generating properties, to the south. In addition to the severe loss of revenue to our club, our long-term financial survival is jeopardized by the loss of existing members who will leave the Club as a result of the loss of moorage. Moreover, our ability to attract new members as existing members die or move away will be crippled by the fact that we will have less moorage available as an incentive to membership. In sum, The Queen City Yacht Club's ability to survive the taking of our property is in serious doubt if Dock 3 is taken.

c-023-005 | 6. Concrete Piling Placement and Access to Property. The report fails to identify construction and design alternatives that would minimize the impacts of the final project on our club.

c-023-006 | 7. Existing and Future Environmental Damage. The DEIS also fails to address the environmental damage created by the existing structure on the sediment levels of Portage Bay. As a long term resident organization on the Bay, our Club has observed that the sediment levels have risen since the construction of the existing bridge. This has steadily made the bay more shallow, diminished water-quality levels in the Bay and made our property less accessible, impacting our ability to maneuver boats within our property and near the existing bridge. The report does not address how the state will remedy the existing sedimentation problem or mitigate and eliminate further silting of the surrounding properties during construction and in the final design of the new bridge.

c-023-007 | 8. Mitigation of Width of Bridge through Portage Bay. The report does not clarify the actual width of the bridge as it passes through the Portage Bay corridor. At present, the report appears to construct the bridge with shoulders that would be appropriate for wide open stretches in eastern Washington, but this design fails to consider narrowing the shoulders and width of the bridge through this area to mitigate harm to the environment and to the surrounding properties. Narrowing the shoulders and overall width would potentially avoid our property altogether.

c-023-008 | 9. Impact on Remaining Property. The bridge designs depicted in the DEIS significantly impact the value of our remaining property, for it builds the bridge nearly adjacent to our newly renovated clubhouse and diminishes the overall waterfront footprint of our property. We would encourage the Project to consider design and construction that mitigates or eliminates these impacts to our facilities.

c-023-009 | 10. Construction Sequence of Bridge. The report is silent on the impact of the construction sequence of the bridge as it relates to the Portage Bay corridor. Moreover, it fails to consider or discuss alternatives that would lessen the impact upon our property. Specifically, the DEIS appears to consider a construction process that fabricates a 30-foot wide temporary construction bridge and a new 60-foot wide bridge all to the north of the existing to allow traffic to flow during construction of the permanent bridge. This method of construction disallows a straightening of the bridge at the west end of the Portage Bay viaduct. This method displaces the greatest amount of private property, especially that of Queen City Yacht Club.

A method that would mitigate the impact to our property would be to reconsider the alignment across Portage Bay to the south, and adopting a construction sequence that uses temporary roadways and detours in conjunction with the existing structure, to minimize impacts on our property. Other construction sequencing alternatives would appear to exist, including building portions of the new structure, diverting some of the traffic onto the new structure and then building the remaining structure.

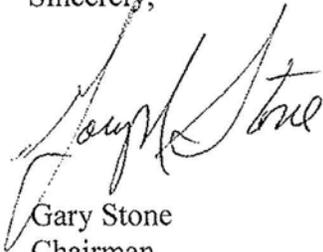
C-023-010

11. Support for Pacific Street Interchange Option. Finally, Queen City Yacht Club values its neighborhood and endorses measures to enhance the quality of life in the Montlake and Portage Bay communities. In concert, we also recognize the importance of a regional transportation solution. Our review of the options as set forth by the state lead us to the conclusion that the Pacific Street Interchange Option improves traffic flow through the Montlake community better than any other option. Traffic is managed at the point of congestion instead of backing up onto the bridge. Additionally, moving more of the traffic off the bridge at a Pacific Street Interchange would enable the designers to look again at the real needs for capacity over Portage Bay.

In conclusion, the state's proposed bridge plan, as depicted in the DEIS, may cripple and materially impact Queen City Yacht Club's ability to exist. The bridge plan further fails to mitigate the impact on revenue-generating property and on the environment.

We look forward to a positive dialogue with your designers, engineers, and land use teams to resolve these issues and make this project a win-win for all parties involved.

Sincerely,



Gary Stone  
Chairman  
Queen City Yacht Club  
520 Mitigation Committee

cc: Robert Yates, Commodore  
William McGillin, Vice Commodore  
Past Commodore Jeff Ewell, Chairman, Board of Trustees  
Elaine Spencer, Graham & Dunn  
Scott Grimm, Past Commodore

---

**From:** Shannon Boldizar [mailto:sboldizar@bellevuechamber.org]  
**Sent:** Thursday, October 26, 2006 11:36 AM  
**To:** governor.gregoire@governor.wa.gov; Ziegler, Jennifer; Krueger, Paul F; MacDonald, Doug; gdegginger@ci.bellevue.wa.us; ssarkozy@ci.bellevue.wa.us; esser\_lu@leg.wa.gov; hunter\_ro@leg.wa.gov; tom\_ro@leg.wa.gov; weinstei\_br@leg.wa.gov; jarrett\_fr@leg.wa.gov; clibborn\_ju@leg.wa.gov; finkbein\_bi@leg.wa.gov; nixon\_to@leg.wa.gov; springer\_la@leg.wa.gov; reagan.dunn@metrokc.gov; jane.hague@metrokc.gov; kathy.lambert@metrokc.gov  
**Cc:** bnokes@bellevuechamber.org; LeslieL@BellevueDowntown.org  
**Subject:** SR 520 Project DEIS Letter

Governor Gregoire,

Attached is a letter from the Bellevue Chamber of Commerce and the Bellevue Downtown Association related to the SR 520 Bridge Replacement Project DEIS.

Shannon Boldizar  
Government Affairs Director  
Bellevue Chamber of Commerce  
425-213-1203

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October 25, 2006

The Honorable Christine Gregoire  
Governor  
State of Washington  
Legislative Building  
Olympia, WA 98504

**Re: SR 520 Draft Environmental Impact Statement**

Dear Governor Gregoire:

On behalf of the Bellevue Chamber of Commerce and the Bellevue Downtown Association (BDA), we would like to provide comments on the SR 520 Draft Environmental Impact Statement (DEIS) and help guide your decision-making process in selecting a preferred alternative for one of our critical Eastside transportation corridors.

When we met last month to discuss *The Next Washington*, it was no surprise that transportation rose to the top of the list of key concerns for Eastside communities. As you mentioned, we are practically our own economy and consequently, both the Bellevue Chamber and Bellevue Downtown Association are ardent supporters of building a comprehensive transportation system that will move people and freight safely and conveniently through and around Puget Sound's major corridors and urban centers. Our members believe that a balanced, integrated transportation system is critical to our state remaining a vital and competitive global economy and is also an integral aspect to the quality of life we enjoy.

C-024-001

When addressing transportation road projects, our priorities are cost effective congestion relief, increased capacity and general purpose capacity to accommodate future population growth. Both the Chamber and the BDA were disappointed that the 8-lane alternative – the only option that would have accommodated planned future growth – was not fully considered in the DEIS process. Our organizations have long been on record supporting the study of an 8-lane corridor. Now the alternatives before you will do no better than maintain the status quo. It is unfortunate that this option wasn't given the scrutiny it deserves; as a result, our legacy to future generations will be failure to meet their needs.

Polls have shown that the public is willing to support funding for more capacity. Given safety concerns of the structure, current and future traffic patterns, and ongoing traffic delays throughout the corridor, convincing the public that an 8-lane alternative was the wrong option for the region is going to be a difficult task. Studies show that this is critical to both sides of the lake. Traffic volumes are basically balanced with as many commuters traveling to Eastside jobs and vice-versa. We hope you agree that the state should do all it can to accommodate increased traffic on this corridor and urge you to fully incorporate the 8-lane analysis in the DEIS Appendices as project planning moves forward.

C-024-001 | However, with the 8-lane alternative virtually off the table, we do want to be constructive with our comments. Passing the regional transportation package is a priority for our organizations, as is securing funding for the full SR 520 corridor from I-405 to I-5. We urge you and the WSDOT SR 520 team to consider the following provisions:

C-024-002 | **Pontoon Capacity**  
It is imperative that the pontoons on the SR 520 bridge be constructed to accommodate at least 30% more capacity – the equivalent of 8 lanes of traffic and future high-capacity transit. While we question the overall feasibility of some high capacity transit modes on this facility, this number should, at the very least, be maintained, if not increased, to accommodate potential future modifications. Lane striping options should also be preserved (similar to I-90) and flexibility for high capacity transit modes such as HOT lanes, Bus-Rapid-Transit, Bus-Rapid-Transit Convertible, along with light rail should be considered during the design and planning phase of the project.

C-024-003 | **Direct Access Routes**  
Providing direct access for transit onto SR 520 from Park and Ride facilities, particularly South Kirkland (108<sup>th</sup> Ave. NE) and Bellevue, should be a key component when planning for the corridor. In addition, a system-wide approach to HOV connections should be incorporated taking SR 520, I-405, I-5 and the University District into account and ensuring that existing levels of transit service are not compromised.

C-024-004 | **Connection to I-405**  
To complement funding from both the Nickel Gas Tax and Transportation Partnership Package, project planning should span the entire corridor and carry beyond 108<sup>th</sup> Ave. NE to I-405. The SR 520 team should work cooperatively with the I-405 team on the braided ramp(s) project connecting both corridors to maximize our tax dollars.

C-024-005 | **Innovative Construction**  
You may recall the Access Downtown Project in Bellevue that was completed two years ago. The NE 8<sup>th</sup> Street overpass was built across I-405 and “rolled” into place, allowing NE 8<sup>th</sup> – our main artery to the downtown economic core – to remain open. It was originally slated to be closed for two holiday seasons posing a major setback to our businesses. These types of forward, big-picture thinking along with innovative alternatives and construction methods must be integrated into the design process for SR 520. Eastside transportation leaders are innovative and are working on similar projects all over the world. They bring a wealth of knowledge on best practices that should be incorporated in the EIS process.

Further, we encourage the State to establish a core principle during the design phase of the project that ensures flexibility for any potential future modifications and expansion on the entire SR 520 corridor. If potential constraints are not mitigated now, they will only be more expensive and cumbersome to modify over time.

Another key component of the design process is mitigating the impacts of construction. While we recognize that the Legislature mandated transit mitigation during construction, the expectations for traffic flow, facility closures, etc., should be communicated during the early phases of planning so drivers and businesses can plan accordingly for alternative routes and transportation modes.

C-024-006

**Lids, Navigation and Potential Constraints**

When planning for lids and navigation, long-term impediments to construction should be reviewed during the design phase so construction can take place with "future potential" in mind to accommodate growth, capacity, transit, etc., along the entire corridor. While lids serve to connect communities, they should not preclude flexibility for future expansion. Consideration should also be given to preserving navigation clearance for watercraft, potential passenger ferry lines and other water-borne modes of transportation. All need to be accommodated without constraint and within the minimum limits established by current regulations.

C-024-007

**Tolling**

In order to fully fund this facility, toll revenue will be a critical component of the financial equation. Analysis shows that toll revenue would be lower per vehicle on the 8-lane option, yet raise more revenue than higher tolls on the six-lane configuration. Overall, the 8-lane alternative will provide more revenue to fund the facility. In addition, we ask that you maintain support for the state's policy that toll collections be removed once a structure is paid in full. Further, tolls collected on SR 520 should be dedicated solely to this corridor and should be coordinated with potential tolling on other facilities. Over time, we also encourage you to explore how revenue from 520 tolls could be dedicated to implementing an 8-lane facility.

C-024-008

**Bicycle/Pedestrian Lane**

While we appreciate the need for multi-modal transportation and pedestrian options, priority on the SR 520 corridor should first be given to additional lane capacity. WSDOT cost estimates for the 14-foot wide bike/ped lane are approximately \$90 million. When analyzing the total cost of the overall structure divided by cost per lane mile, the total for the bike/ped lane is closer to \$500 million. Lane costs for mixed-use, two-way traffic should be allocated proportionally with overall lane costs, not separated out. Given the limited funding available on this corridor, constructing a 14-foot bike/ped lane is overkill. Additional lane capacity should be built instead with a significantly reduced width in the bike/ped lane.

C-024-009

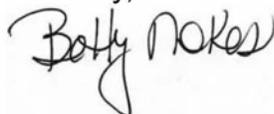
**Sound/Noise**

Walls to reduce noise impacts throughout the corridor are a vital component in preserving Eastside neighborhoods and quality of life.

We appreciate your recognition of the vulnerability of SR 520. This corridor is a critical component of our economic viability and competitiveness, as well as a valuable asset to our region and our state in terms of capacity and freight mobility. Carrying nearly 102,000 vehicles each day and given the known safety issues, the sooner a decision on a preferred alternative can be made, the sooner WSDOT will be able to move forward with innovative design and detailed cost estimates for the regional ballot measure.

The Bellevue Chamber and the Bellevue Downtown Association commend your leadership on transportation issues and also recognize the challenges that lay before you. We appreciate the opportunity to share our comments and thank you for your consideration.

Sincerely,



Betty Nokes  
President & CEO  
Bellevue Chamber of Commerce



Leslie Lloyd  
President  
Bellevue Downtown Association

- c: Paul Krueger, WSDOT Environmental Manager, SR 520 Project Office
- Bellevue Chamber Board of Directors
- Bellevue Downtown Association Board of Directors
- Mayor Grant Degginger, City of Bellevue
- Steve Sarkozy, City of Bellevue
- Sen. Luke Esser, 48<sup>th</sup> District
- Rep. Ross Hunter, 48<sup>th</sup> District
- Rep. Rodney Tom, 48<sup>th</sup> District
- Sen. Brian Weinstein, 41<sup>st</sup> District
- Rep. Fred Jarrett, 41<sup>st</sup> District
- Rep. Judy Clibborn, 41<sup>st</sup> District
- Sen. Bill Finkbeiner, 45<sup>th</sup> District
- Rep. Toby Nixon, 45<sup>th</sup> District
- Rep. Larry Springer, 45<sup>th</sup> District
- King County Councilmember Reagan Dunn
- King County Councilmember Jane Hague
- King County Councilmember Kathy Lambert



# City of Seattle

Gregory J. Nickels, Mayor

**Seattle Transportation**  
Grace Crunican, Director



October 27, 2006

*Seattle  
Freight  
Mobility  
Advisory  
Committee*

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

Peter Whitehead  
Nelson Trucking  
Co-Chair

Vacant  
Co-Chair

Warren Aakervik  
Ballard Oil

Pat Binion  
Alaska Distributors

Andrew Johnsen  
BNSF Railroad

Ed Shilley  
NUCOR Steel

Christine Wolf  
Port of Seattle

RE: Comments on the SR 520 Project DEIS

Dear Mr. Krueger:

The Seattle Freight Mobility Advisory Committee thanks WSDOT for including us in reviewing the SR 520 draft environmental impact statement (DEIS). We have watched this issue and have had many updates and meetings over this important undertaking. Below are some of the main issues we feel need to be included and/or taken into consideration:

1. Maintaining sufficient through capacity on this route is critical to keeping trucks moving.
2. Keeping vertical heights as high as possible for overhead structures, toll booths and other overhead equipment to accommodate oversize loads being brought to this area of Puget Sound. Oversize routes must be maintained for the Eastside and to access Puget Sound industries and ports. If there are any toll booths, vertical and horizontal clearance should allow passage of an oversize load.
3. Note that the City of Seattle considers a truck design envelope of a 20' X 20' vehicle for overlegal (oversize) loads on major truck routes.
4. Keeping grades as level as possible for maintaining freight mobility, and for visibility, fuel consumption and exhaust emissions reasons. We are particularly concerned about the ramp to the proposed Pacific Avenue interchange. We suggest that grades should be kept to no more than 7%, preferably no more than 5%.
5. Revising the ramp design for the west-bound SR-520 to I-5 merge to make it safer and easier for trucks. Trucks have slower acceleration and deceleration

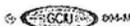
c-025-001

c-025-002

c-025-003

The Seattle Freight  
Mobility Advisory  
Committee advises  
elected officials, SDOT  
and other agencies on  
measures to improve  
freight mobility and safety  
in Seattle.

Seattle Freight Program Websites: <http://www.seattle.gov/transportation/freight.htm>  
<http://www.seattle.gov/transportation/fmac.htm>



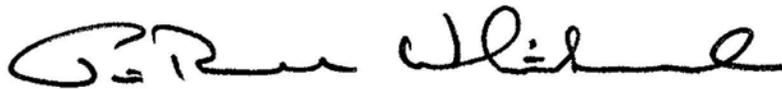
Paul Krueger  
Page 2 of 2  
October 27, 2006

characteristics. This is of particular importance where trucks merge into traffic at a left hand entrance ramp.

- c-025-004 | 6. Coordination between the Viaduct Replacement Project construction schedule and the SR 520 construction schedule. Minimizing north/south travel congestion at the primary interchanges with SR 520 is critical. Ensure that the two projects (SR 520 and SR 99) will not have concurrent construction underway.
- c-025-005 | 7. Maintaining traffic movement on SR 520 to the extent possible and minimize the time that SR 520 is closed to traffic.
- c-025-006 | 8. The Committee wants to know what the truck design vehicles are for improvements in the project area. Note that the City of Seattle has designated SR 520, I 5, NE Pacific Street and Montlake Blvd NE (SR 520 to Pacific) as Major Truck Streets. The Committee recommends consideration of a WB 67 design vehicle on the Major Truck Streets.
- c-025-007 | 9. All covered roadways and tunnel sections should not negatively impact the transport of hazardous materials.
- c-025-008 | 10. The Committee supports the proposed Pacific St Interchange.

If you have any questions on the Freight Committee's comments, please contact Ron Borowski, SDOT Freight Program at 206 684 8370 or myself at 206 947 6180.

Sincerely,



Peter Whitehead, Co-Chair  
Seattle Freight Mobility Advisory Committee

Cc:  
Mayor Greg Nickels  
Councilmember Jan Drago, Chair Council Transportation Committee  
FMAC Members  
Grace Crunican, SDOT  
Ron Borowski, SDOT  
David Allen, SDOT

**From:** [Midori Dillon](#)  
**To:** [SR 520 DEIS Comments](#);  
**CC:** [John Hempelmann](#); [gerry@designplus-wa.com](mailto:gerry@designplus-wa.com); [schwab.evan@dorseylaw.com](mailto:schwab.evan@dorseylaw.com);  
**Subject:** Comment Letter  
**Date:** Friday, October 27, 2006 3:22:11 PM  
**Attachments:** [scan.pdf](#)

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Please see attached.

<<scan.pdf>>

**Midori Stocker-Dillon**

Legal Assistant

Cairncross & Hempelmann, P.S.

524 Second Ave., Ste. 500

Seattle, WA 98104-2323

[mdillon@cairncross.com](mailto:mdillon@cairncross.com)

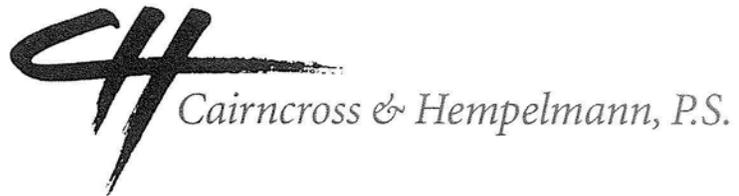
Direct phone 206-254-4401

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October 27, 2006

Paul Krueger (VIA EMAIL: [SR520DEIScomments@wsdot.wa.gov](mailto:SR520DEIScomments@wsdot.wa.gov))  
WSDOT Environmental Manager  
SR 520 Project Office  
414 Olive Way, Suite 400  
Seattle, WA 98101

Re: SR 520 DEIS Comments on Behalf of Seattle Yacht Club

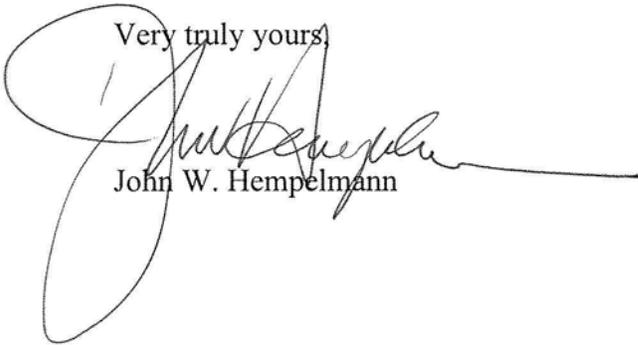
Dear Mr. Krueger:

c-026-001

We are writing to comment on the Draft Environmental Impact Statement for the SR520 project. On behalf of the Seattle Yacht Club, we want to express concern about the potential disruption of access to the dock and moorage facilities. As you no doubt know, the Seattle Yacht Club facilities in Montlake are used by hundreds of members, guests and, at certain times, the public. The Club specifically requests that the Final Environmental Impact Statement address ways to mitigate the probable significant adverse impacts of all of the project alternatives on the Club's facilities.

We would be very happy to work with you and your staff to address these matters. We would be happy to give you a tour of the facilities and provide you with any other information you may find useful as you proceed with the Final Environmental Impact Statement.

Very truly yours,



John W. Hempelmann

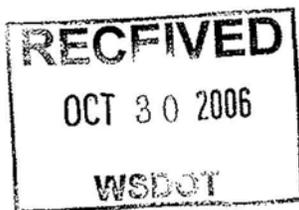
JWH:msd  
cc: Seattle Yacht Club

Law Offices

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Page 401  
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1617 Boylston Avenue • Suite 202 • Seattle, WA 98122 • (206) 329-2336 • Fax (206) 329-2705  
info@transportationchoices.org  
www.transportationchoices.org

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

Re: SR 520 DEIS RESPONSE FROM TRANSPORTATION CHOICES COALITION

Dear Mr. Krueger;

On behalf Transportation Choices Coalition, I appreciate the opportunity to submit comments on the 520 Bridge Replacement Project. The 520 corridor is a unique and regionally significant resource in terms of natural environment, community character, and economic opportunity. As an overarching theme, I urge you to take the utmost care in integrating land-use considerations, human and environmental health, and high-quality community design into this project.

In particular, I would like to highlight the challenge we face with climate change. Climate change is no longer a topic of debate: rather, it is our most urgent environmental and social challenge. In Washington transportation is the single largest source of global warming emissions and we therefore cannot afford to build a 520 replacement with a business-as-usual mentality.

The effort to replace the SR 520 Bridge is a singular opportunity to move beyond the status quo – indeed, we must if we want to design a bridge that takes into account climate change, neighborhood disruption, environmental stewardship, and mobility in the face of major population growth.

Please take the following comments into consideration:

**Mobility**

**C-027-001 Any alternative should aggressively maximize the use of transit, active traffic management, congestion pricing and Transportation Demand Management to move people through the 520 corridor.**

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

**C-027-002 A four-lane option with congestion-pricing should be studied.**

- WSDOT should provide supplemental information on another 4-lane option that includes a "congestion-pricing" toll that ensures free flow at rush hour for a four-lane option, to provide incentives to reduce SOV use and increase the use Transit/HOVs.
- We urge the studying of tolling on the I-90 bridge to reduce diversion of SR 520 users to another close-by Cross-Lake facility as well as the effect of system-wide tolling on 520 Bridge throughput.

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



- C-027-003
- A chosen alternative should provide connectivity westbound to MOHAI and beyond to Roanoke, north to UW and beyond on Pacific Interchange, south on to 43rd street in Madison Park, and EAST to connect with existing SR520 trail.
  - Connections should be the appropriate height/grade for bicycle and pedestrian use of all levels and abilities.

C-027-004 **Protection of human health**

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

- **Noise** – There should be no increase in noise levels and those noise levels should comply with King County code Chapter 12.88, Seattle and Bellevue codes or be mitigated, unless waived by the community.
- **Air quality** – There should be no decrease in air quality from a new bridge or from bridge construction.
- **Water Quality** - There should be no decrease in water quality from a new bridge or from bridge construction. Water quality includes water quantity, stormwater, spill containment, and wetlands.
- **Health Impact Assessment** be made for the alternative chosen. *Health impact assessment (HIA)* is commonly defined as "a combination of procedures, methods, and tools by which a policy, program, or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population"

C-027-005 **Lid options should be studied and presented to the community for all alternatives.**

C-027-006 **Protection of the Arboretum and open space**

**Any alternative should protect the Arboretum and open space.** The alternative selected should not include a Lake Washington Boulevard interchange or an increase in traffic through the Arboretum. In addition, a feasible and prudent option ensures there will be:

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

**Protection of the natural environment**

C-027-007 **Provide adequate mitigation for impacts on plant and animal populations.** Specifically:

- 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.
- There should be a net gain in vegetation, especially trees, based on the inventories noted above.
- 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.

C-027-008 **Select the alternative that most supports good land-use:** The SR520 Bridge replacement project is an excellent opportunity to meet the goals of the Growth Management Act, and selection of the preferred alternative should consider potential impacts and benefits to land use and future development.

C-027-009 **Reductions in global warming emissions.** Supplemental information should be provided to show how we can achieve a net reduction in global warming emissions for each alternative over a 2006 baseline.

C-027-010

**Reduction of the footprint of each alternative**

**The footprint of each of the six-lane options should be drastically reduced.** Options should be looked at to drastically limit the existing footprint including:

- Two-lane, bus and HOV-only Pacific interchange. We acknowledge that this severely limits SOV access to the UW but the environmental and aesthetic benefits outweigh this concern. This supports UW's neighborhood commitment to grow without increasing SOV trips.
- Eliminating a Montlake exit/entrance
- Severely reducing shoulder widths and lane widths. WSDOT should consider reducing design speed and vehicle speed on the bridge to ensure safety on narrower lanes as well as maximizing throughput.
- As mentioned in the above mobility section, possible future light rail should be accommodated in the proposed four-lane or six-lane footprint.

C-027-011

**Financing**

- The region should contribute significantly to financing the 520 project through the Regional Transportation Investment District within its current taxing authority.
- Tolls should be imposed now to start generating revenue for the project.

With this project we have the opportunity to dramatically reshape the direction of transportation and make investments that improve our mobility, health, and quality of life and we appreciate opportunity to comment.

Sincerely,



Jessyn Schor  
Executive Director  
Transportation Choices Coalition

**From:** [Preston, Anne](#)  
**To:** [SR 520 DEIS Comments;](#)  
**CC:** ["Jack & Kath Kindred"; "Ron Melnikoff and Cathy Garrison";  
"Melnikoff, Ron";](#)  
**Subject:** Comment on 520 Draft EIS  
**Date:** Monday, October 30, 2006 5:49:56 PM  
**Attachments:** [Revised SR 520 Comment Letter.doc](#)

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\*\*\* eSafe1 scanned this email and found no malicious content \*\*\*

\*\*\* IMPORTANT: Do not open attachments from unrecognized senders \*\*\*

## **Portage-Bay Roanoke Park and Fuhrman Boyer Neighborhood Improvement Association Comment Letter SR 520 Draft EIS.**

The Portage-Roanoke Park Community Council and The Fuhrman-Boyer Neighborhood Improvement Association (FABNIA) are neighborhood associations that represent the residents of our Seattle community that is located east of I-5 adjacent to SR 520.

Portage Bay / Roanoke Park Community Council was founded in September of 1977. The council has served the community by providing both a forum to discuss neighborhood development issues and as an implementing agent for community improvements. The council has worked recently with WSDOT on the installation of I-5 noise walls on Harvard Avenue, completed a Roanoke Park rehabilitation, and has improved landscaping adjacent to Delmar Drive.

FABNIA is a community Non Profit organization formed in 1995 to work on traffic and community development issues in the Fuhrman –Boyer Street corridor in the Portage Bay – Roanoke Park and Mountlake neighborhoods. We have worked with City of Seattle Parks and Transportation Departments to install street calming traffic circles/ bulb-outs, improve bicycle and walking opportunities and to improve south Portage Bay's natural areas and recreational use areas adjacent street ends and the Montlake playfield.

Land use in Portage Bay -Roanoke Park and nearby parts of the Montlake Community is primarily single family with some multiple housing along Fuhrman-Boyer and Harvard Avenues. The area's residential streets plus Delmar, Boyer-Fuhrman and Harvard arterials are used by recreational pedestrians, runners, and bicycle riders (a key leg in the bridge to bridge non-motorized system). Our neighborhood is served by Metro route #25. Increased traffic congestion on Harvard and Roanoke Avenues results in part from their access to and from I-5 and SR 520. Fuhrman/Boyer Avenue has increased traffic speeds and volumes as a result in part from commuters moving east-west from the U-District, Wallingford, and Eastlake to the Lake Washington/Arboretum and Montlake interchanges. Fuhrman-Boyer Avenue and Delmar Avenue East are bisected by SR 520. A review of the Draft NEPA EIS indicates that our neighborhood adjacent to SR 520 will likely have more significant construction and long-term operational impacts than any other residential area

### **Construction impacts identified in the draft EIS during the estimated 28 month Portage Bay area construction period include:**

- Noise from pile driving for the steel support piles needed for the support piers of the 2 temporary and the permanent replacement bridges will affect residences in our neighborhood that are located within 300 feet of Portage Bay (Chapter 4- page 33 and Chapter 8 - Page 18)
- Vibrations from impacting residences from pile driving (Chapter 8- Page 22)
- Dust from Portage Bay, Delmar and 10<sup>th</sup> Avenue bridge demolitions that will impact nearby areas (Chapter 4-33 and Chapter 8-Page 20)
- Exhaust emissions from construction vehicles (Chapter 8- Page 28)
- Periods of restricted access to homes (and recreational use areas) near SR 520 (Chapter 8-Page 22)

C-028-001

C-028-001

- Closure of Delmar Drive for 9 -12 months for replacement of its SR 520 bridge crossing will funnel traffic onto 11<sup>th</sup> Avenue which is a narrow, steep residential street and Fuhrman-Boyer Avenue which is the only detour connection to the north and east. (Chapter 8-Page 4 plus information in Transportation Discipline Report).
- Passage of 4 -12 construction vehicles per hour on Furman –Boyer, Harvard Avenues during peak construction periods. (Chapter 8 –Page 15)
- Possible turbidity and pollution problems in Portage Bay (Chapter 8-Page 24)
- Possible slope failure of the hill above Boyer during construction which previously occurred in 1963 during original SR 520 construction at Delmar and 10<sup>th</sup> Avenue East (Chapter 8 –Page 27)
- Loss of the only residence in SR 520 corridor which is located at 2542 on Boyer Avenue (Chapter 5- Page 33)
- Loss of docks at the Queen City Yacht Club (Chapter 8-20) and The Portage Bay Condominium.

**Other construction impacts are not discussed in the draft EIS. They include:**

- Possible elimination or service cut-backs of the Route 25 bus service on Fuhrman-Boyer Avenue requiring long walks to Eastlake, Montlake, or 23<sup>rd</sup> Avenue for other bus access.
- Disruption of bicycle use and walking opportunities of Fuhrman-Boyer Avenue owing to traffic closures and traffic congestion
- Possible access limitations to the Montlake Playfield that includes ballparks, a gymnasium, a summer camp program and adult recreational activities. The ballparks and gymnasium have for several been at capacity for youth and adult soccer, football and basketball programs.
- A projected level of construction noise and vibration that will limit use of the community's street end parks and Montlake Playfield area for both wildlife and human activity.
- Placement of construction barges on Portage Bay that will eliminate or severely restrict recreational boat usage
- Placement of barges and other bridge construction activities will use wildlife usage of the south shore of Portage Bay. This area includes a rare inner city marshland. This area has been frequented by herons, bald eagles, turtles, cormorants and beavers.
- Vibrations along unstable slopes with single-family housing on Fuhrman-Boyer Avenue, Delmar and Roanoke Streets. Homes located on Fuhrman Avenue lost their backyards during the slide season several years ago, and the repairs to the slope cost hundreds of thousands of dollars to repair.

The draft EIS does not list the Montlake Playfield as a possible staging. Area. If it is selected the level of impact would likely even be greater.

C-028-002

**Permanent Project impacts identified in the EIS that directly and negatively impact our neighborhood area include:**

- Increased shading of Portage Bay (Chapter 9 – Page 8)
- Undefined configuration of conceptual Portage Bay bridge stormwater wetland treatment facility (Chapter 3 Exhibit 12 - Page 41)

- 6-028-002**
- Placement of a water quality vault between Boyer Avenue East and the Portage Bay shoreline (Chapter 3 –Page 39)
  - Need for noise walls. (Chapter 5- Pages 19-22)
  - View obstructions of Portage Bay from nearby areas (Chapter 5- pages 2-3)
  - Increase in evening peak hour traffic at E Roanoke/Harvard off ramp with 6 lane alternative (Chapter 5-Page 13)

**Permanent impacts that are not specifically discussed in the draft EIS include:**

- Lack of any discussion of the proposed project's night lighting and glare
- Street traffic flow changes on our neighborhood arterials including Boyer-Fuhrman Avenue, Delmar, Harvard and other connecting streets to SR 520 access ramps. The existing traffic projections on these streets are included in the Transportation Discipline Report only in areas adjacent to the Roanoke/Harvard intersection. Livability and safety are greatly impacted by speed and volume, and this analysis completely ignores these issues, and instead focuses only on signalized intersection capacities.
- Lack of a full discussion on the project's impact on I-5 traffic congestion. Adding traffic to I-5 may also divert more traffic to Seattle surface streets.
- Possible increase in our neighborhood's noise levels and air pollution owing to increased traffic congestion on connection streets to SR 520 access ramps. Air pollution may also increase if there are more vehicles on an expanded SR 520 east of I-5 interchange.
- Limitations on recreational boat use of Portage Bay after construction of the larger bridge crossing and proposed wetland stormwater treatment facility
- Long term changes in wildlife usage of Portage Bay shoreline area adjacent to Mountlake Playfield
- Recreational use at street end parks and Montlake Playfield

**C-028-003**

**The analysis of significant impacts to our neighbor included in this draft EIS is totally deficient with the exception of noise impacts.**

Our neighborhood residents appreciate that the project does include a noise wall as mitigation. Only the discussion on noise wall mitigation appears detailed enough to be fully understandable. We would like its design options to consider the installation of a plexiglas wall. A lighter, brighter and more aesthetic plexiglas wall will preserve views for both motorists passing across the Portage Bay Bridge plus the territorial and distant views of nearby residents. It would allow construction of a lighter, less massive, likely less expensive structure across Portage Bay.

**C-028-004**

Otherwise, not enough specific information is provided to understand the magnitude of both construction and permanent impacts in just about all impact areas. Many of the reader friendly chapter discussions in the draft EIS discuss multiple topic areas in a manner that is too diffuse and generalized.

**C-028-005**

Possible best management practices (BMPs) for construction noise, dust, air and water pollution control activities, traffic detour routes and work schedules need more detailed analysis. A plan for monitoring of dust, vibration and noise impacts needs to be included. The plan needs to

- c-028-005 | include mitigation for various levels of impacts. The discussion of BMPs in this EIS does not include necessary specifics.
- c-028-006 | The draft EIS's analysis of permanent project impacts on traffic congestion analysis notes that a specific LOS level of E is forecasted for the six lane alternative at the Harvard/Roanoke intersection. This complex coupling of streets that includes 10<sup>th</sup> Avenue East, Roanoke, Harvard and Delmar plus a SR 520 off ramp is already a log jam during rush hour periods. The area has also become less safe for bicyclists and pedestrians who need to cross the roadways,. The further decline in LOS requires traffic and safety mitigation that is not specifically discussed.
- c-028-007 | The draft EIS also considers LOS levels of other intersections in this area from A to D as low to moderate and puts them all together as an apparently acceptable level of impact. Intersection delays at levels C and D will cause diversion of traffic to our street corridors. The diversion of traffic into our neighborhood from the University District, Wallingford, Eastlake, and North Capital Hill for motorists seeking I-5 and SR 520 access ramps has been an ongoing impact in our residential neighborhood. All neighborhood intersections need to be analyzed not just those in the Harvard/Roanoke/10<sup>th</sup> intersection area.
- c-028-008 | I-5 apparently does not have the capacity to handle additional traffic from SR 520. The additional capacity may also result in more traffic being diverted to Seattle arterials that serve our neighborhoods. The increased traffic and congestion may totally overwhelm our neighborhood.
- c-028-009 | There is no discussion on the coordination necessary to provide traffic circulation with the proposed 9 –12 month closure of Delmar Drive East and the undiscussed schedules of closures for the Boyer Avenue and 10<sup>th</sup> Avenue East SR 520 crossings. The possibility of completing one half of the bridges at a time has not been considered. .
- c-028-010 | The proposed storm water treatment facilities to be located in our neighborhood do not include any estimation of size configurations. The size of the storm water treatment vault on Boyer Avenue may be a significant impact. The innovative but not as yet implemented concept of a storm water treatment wetland at the base of Portage Bay bridge piers also has no information on its possible size or extent. Since treatment areas generally must be at least 1/3 the area of the surface area to be treated, this constructed wetland must be much larger than shown. The relatively large area needed under the bridge for this treatment concept is not evaluated. The size of the storm water facilities along with the increases size of a 4 or 6 lane bridge will significantly impact both the natural habitat of Portage Bay and its recreational use. This may make it impossible to continue our efforts to improve the natural habitat and recreational activity at street end parks and the Mountlake playfield area.
- c-028-011 | There is no specific discussion of the construction impacts affecting wildlife usage of marshland  
c-028-012 | area on the south shore of Portage bay and access limitations to the recreational programs at the Montlake Playfield.
- c-028-013 | The draft EIS also does not discuss the recent vote of the eastside communities to favor the development of light rail service to Bellevue and Redmond via I-90 over further expansion of

C-028-013 regional bus service. The impact of this proposal on regional METRO SR520 corridor bus is not discussed. This development compliments the 4 lane alternative since the additional HOV lanes in the 6 lane alternative may now be considered as a lower public priority whose expenditure may remove funding availability for east side light rail

C-028-014 The draft EIS finally does not provide a thorough review of the tunnel option discussed in Chapter 3, pages 5-6. Without a full analysis of its impacts, dismissing it as too expensive is premature and irresponsible. A comparison needs to be included of its impacts compared to the no-build, four lane and six lane alternatives.

C-028-015 **The lack of specific information also makes it difficult to judge the difference in relative impact of the no build, 4 lane and 6 lane alternatives. It also does not consider any appropriate mitigation.** The extent and severity of construction and post construction operational impacts discussed in this letter will likely force many of our neighborhood residents to conclude that the no build option is the only livable alternative. As noted there is not enough information to determine if we can adequately adjust to the construction and operational impacts of even the four- lane alternative. Our neighborhood residents may accept the four lane alternative if adequate impacts and mitigation information is provided. This may include shrinking the width of the proposed shoulders and placing the bike lane under the Portage Bay Bridge. The only clearly documented advantage of the six-lane alternative for our neighborhood is the proposed lid over SR 520 between 10<sup>th</sup> and Delmar. We do not understand why the lid also cannot be provided for the 4- lane alternative. Is the inclusion of a lid only for the six lane alternative recognition of this alternative's considerable additional impacts? The difference in extent of impacts created by the six lane alternative as compared to that created by the four lane alternative can not be clearly understood from information provided in the draft EIS.

C-028-017 The severely intrusive impacts of the project's intensive twenty eight month construction period can only be acceptable with an appropriate level of mitigation. FABNIA with the support of the Portage-Bay Roanoke Park Community Council has worked with the Montlake Playfield Advisory Board completing a plan for long-term improvements of the south Portage Bay shoreline area and adjacent sections of the playfield. City of Seattle Parks Department has approved this plan. Appropriate mitigation should consider support for plan elements that include building a walkway connecting the Everett street end with the Montlake Playfield area and providing natural tree plantings in the playfield area adjacent to the Portage Bay shoreline. The walkway will provide a pedestrian pathway connecting the Portage Bay and Montlake communities that will be away from the increasing traffic congestion on Boyer Avenue and other streets.

C-028-018 Another appropriate element of support will be providing funding for additional traffic calming measures along Harvard and Fuhrman-Boyer Avenues. Designs for traffic calming of each intersection on Fuhrman and Boyer Avenue are designed and on file with Seattle Department of Transportation.

C-028-019 We find that this draft EIS does not adequately address the very significant impacts of the four and six lane build alternatives that will impact our community. This draft EIS must be rewritten to include more specific information on impacts and mitigation measures.

Please contact us if you wish to discuss any element of this letter. .

Jack Kindred  
President  
Portage Bay Roanoke Park Community Council

Anne Preston  
President  
Fuhrman Boyer Neighborhood Improvement Association

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**From:** Pete DeLaunay [mailto:pete@delaulnay.com]  
**Sent:** Monday, October 30, 2006 10:14 AM  
**To:** Swenson, Michael/BOI  
**Subject:** Bayshore Property Comments on SR 520-DEIS

**Portage Bayshore Association**  
2524 Boyer Ave. E. -- Seattle, Washington 98102  
[www.portagebayshore.org](http://www.portagebayshore.org)

October 30, 2006

**TO: WSDOT SR 520 Project Management**

FR: Pete DeLaunay, Secretary, Portage Bayshore Condo-Marina Association  
2524 Boyer Ave. E., Seattle, WA. 98102  
([www.portagebayshore.org](http://www.portagebayshore.org))

**RE: DEIS Comments/Mitigation -- Bayshore property and neighborhood**

The Bayshore property is located in the Portage Bayshore neighborhood of Seattle -- and just south of the existing Portage Bay viaduct -- on Boyer Ave. E. The Bayshore property is a community of 24 condominium units and 30 moorage slips, 15 of which are located under the building which extends over the water. The building's foundation/marina footings were installed when the building and marina was constructed in the early sixties.

The Bayshore property owners Association represents a condo-marina complex with 40 owners including 24 condo owners/14 with slips, and 16 slip owners. It is administered by a board of directors ([www.portagebayshore.org](http://www.portagebayshore.org)), operating as a non-profit corporation in the State of Washington.

In summary, our immediate comments/ concerns about the SR 520 DEIS are as follows and in no particular order:

c-029-001 | **1. Noise Mitigation** - The draft EIS graphically shows that pile driving needed to install supports for temporary and new bridge piers will create a decibel level of over 100 DBA for a distance of about 300 feet. The Bayshore property is well within 300 feet so we request clarification on construction processes for noise mitigation during construction.

c-029-002 | **2. Bayshore Property Impacts:** There will be dust from bridge removal as well as vibration -- the distance of impact is not discussed ? and needs to be addressed; particularly with the Bayshore construction footprint/ pilings and the impact on the foundation and marina moorings.

c-029-003 | **3. Bayshore Marina Impact/ Access:** The Bayshore property includes 30 moorage slips that accommodate recreational, non liveaboard, boats from 24ft to 40ft in length. While the Queen City Yacht Club moorage impact is discussed, the Bayshore marina is not. Will bridge construction hamper or prohibit access to the marina? With many slips rented, mitigating financial impacts is one of several concerns we have about the SR 520 project on the Bayshore marina.

c-029-004 | **4. Parking/Boyer Ave. Disruption:** The Bayshore property owners and renters will be impacted by parking, congestion and potential closures of Boyer Ave. With Delmar closed for 9-12 months, increased traffic on Boyer Ave. should be mitigated.

c-029-005 | **5. Alternatives:** We encourage more study of the tunnel concept? as the most environmentally sound of alternatives explored to date; short of the no-action upgrade maintenance and retrofit as the most cost effective option. Imposing the toll immediately would help raise additional funds that may be needed for more environmentally and aesthetically responsible alternatives.

c-029-006 | **6. State Environmental Policy Act intentions:** South Portage Bay has long been the refuse area for WSDOT projects over time. Wetlands, species, native plants, salmon habitat have all been affected by highway right-of-way decisions all valid during that time; but until recent times environmental considerations were not a priority. Reclaiming South Portage Bay with removal of silt, invasive plant life, restoration of shoreline (see [www.fabnia.org](http://www.fabnia.org)) and better recreational access will provide an important dimension to Seattle's urban quality of life.

Thank you for your attention and response to the issues we have raised on behalf of 40 owners who respectfully request your vigilance to mitigate impacts of the SR 520 project fairly.



October 30, 2006

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



Dear Mr. Krueger:

**General Comments**

Thank you for the opportunity to comment on the DEIS for the SR 520 bridge replacement project. Seattle Audubon is one of the oldest Audubon chapters in the country started in 1916. We currently represent over 5,500 members and take extreme pride in our mission to cultivate and lead a community that values and protects birds and the natural environment. In fulfilling this mission we strongly believe in seeking balanced solutions to difficult problems, especially in our urban environments.

There is no better example for the need of a balanced and smart approach than when dealing with transportation projects. Most transportation projects bring unprecedented impacts to local neighborhoods, a fact that is undeniable. Most of these impacts are viewed as necessary evils and part of progress. These impacts also usually result in mitigation packages in the millions of dollars. Seattle Audubon strongly believes that we can avoid some of the most damaging impacts that would result through a planning process that deals honestly with all aspects of the transportation project. This honest approach must be holistic and take into account cumulative impacts and more importantly unintended consequences that may result.

We would like to start our letter with three key facts that we believe are undeniable and critical to the SR 520 replacement project.

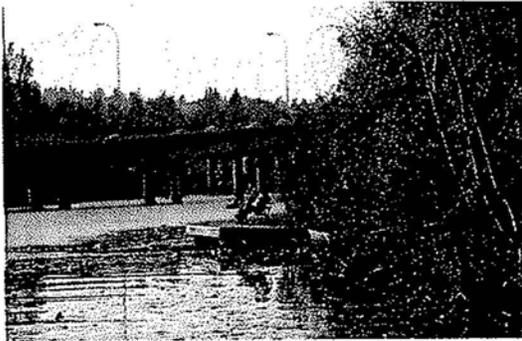
- 1. The SR 520 Bridge needs to be replaced. The safety concerns over Earthquake damage and the potential for catastrophic failure is undeniable.
- 2. There are current areas near the SR 520 bridge infrastructure that provide unique opportunities for people, wildlife and cars to coexist. On any given weekend (rain or shine) there are numerous hikers, canoeists, arboretum visitors, dog walkers, birdwatchers, picnickers and families who visit the area near Foster / Marsh Island and the Arboretum. The Foster / Marsh Island wetland complex is a critical place in the region for wildlife and people. If we value this area we should seek a SR 520 alternative that **avoids** impacts as much as possible rather than **mitigate** impacts to this highly utilized asset.

c-030-001

c-030-002

c-030-003

C-030-003



Nature Viewing Near Marsh Island



Entry to Marsh Island Trail



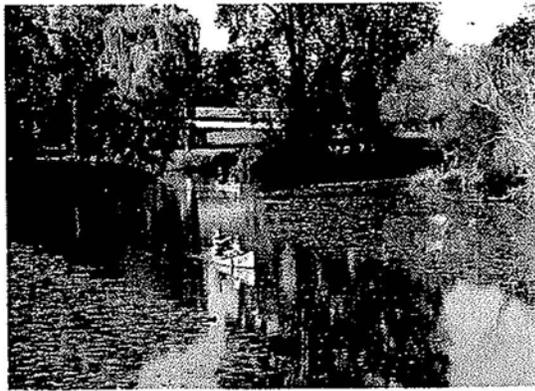
Canoeing and Walking through Marsh Island Wetland Complex



Wood Ducks in the wetlands



WSDOT Peninsula



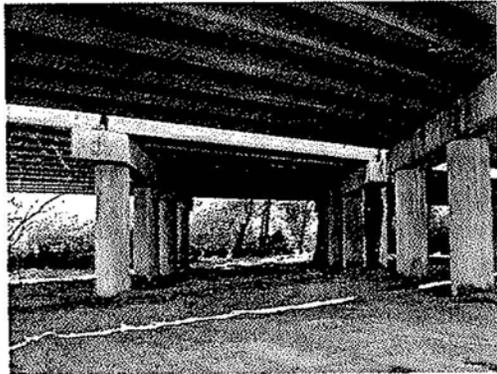
Foster Island Wetland Complex near the Peninsula

C-030-004

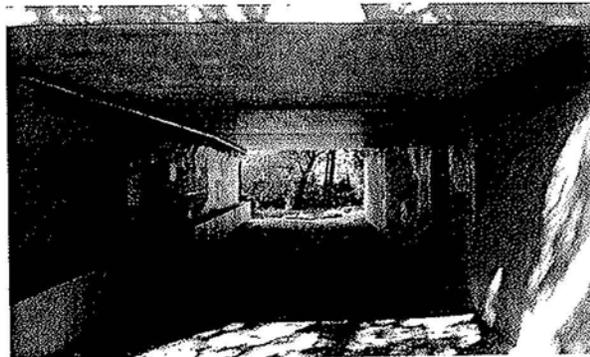
3. No matter what alternative is chosen there will be dramatic impacts to the Foster / Marsh Island wetland complex and the experience of visitors to this regional recreational destination. Nowhere in the DEIS is there a discussion of how this highly visited and important recreational destination will be impacted. This becomes a critical point given the emergence of the Pacific Street Interchange Alternative (PSI) and the dramatic impacts this alternative will have on this entire regional destination.



WSDOT Generated Image of Pacific Street Interchange (PSI)



Existing SR 520 Ramps in Arboretum



Existing SR 520 Tunnel: Main Line

Given the three points above Seattle Audubon strongly suggest the following four action steps. We will elaborate on each issue throughout our letter.

- C-030-005
1. Drop the Pacific Street Interchange Alternative from the list of potential preferred alternatives.
- C-030-006
2. Further research the performance and technical needs of the stormwater treatment basins, the likely impacts from shading, the impacts on Great Blue Heron critical habitat and the true amount of habitat lost as a result of overhead infrastructure. The DEIS does not adequately address these issues.
- C-030-007
3. Develop and discuss a draft mitigation package before a final preferred alternative is locked in. This mitigation must address monetary and maintenance needs for a long-term commitment and success of mitigation measures.
- C-030-008
4. Conduct a complete Section 106 on all historically significant areas and a more thorough investigation of potential impacts to visitors of the Arboretum, Marsh Island, University of Washington Aquatics Center, Foster Island and the pedestrian corridor at Pacific Street. We feel the DEIS does not do an adequate job of determining and discussing impacts to visitors of these critical places.

C-030-009

Our intention in asking for clarification and further investigation on these points is simply to acknowledge that while important the SR 520 bridge replacement project is not a stand alone entity. It is a massive piece of infrastructure that will dominate the scene and impact citizens. The proposed infrastructure will cross over, bisect and permanently remove areas of Foster Island, Marsh Island and currently used green space near the Arboretum. In a truly **context sensitive design** approach impacts to these public areas should be treated with care and sensitivity. According to the Federal Highway Administration context sensitive design is part of the *vital few goal on environmental stewardship and streamlining*.

*“Environmental Streamlining drives us to improve project delivery without compromising environmental protection. Environmental Stewardship helps demonstrate that we are mindful of the natural and human environment while addressing mobility and safety needs of the public. FHWA promotes actions that show we are responsible stewards of the environment. We take advantage of opportunities to enhance environmental protection and encourage partnerships that promote eco-system conservation or encourage broader mitigation strategies that seek corridor or watershed based approaches. Environmental Streamlining solutions must go hand in hand with principles of stewardship.” FWHA website, 2006*

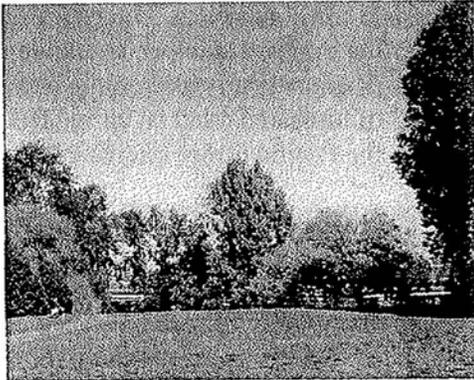
Context sensitive design is about incorporating new and often massive infrastructure into the existing landscape with the least amount of impact. We are asking WSDOT to take another look at the alternatives with the **context** of the Foster / Marsh Island wetland complex in mind.

C-030-010

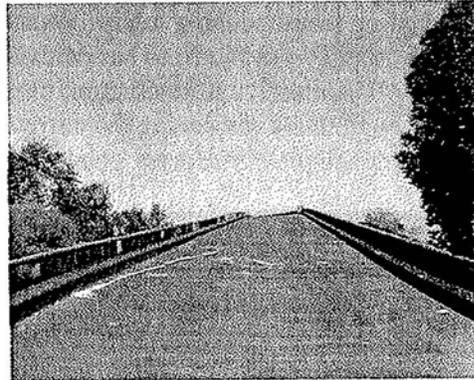
### Alternatives

Seattle Audubon has not officially endorsed a single alternative for the SR 520 replacement. We have chosen not to select a single preferred alternative because we believe any alternative is going to have dramatic impacts on the environment in the area. As a result we strongly feel that a significant mitigation package will be needed to ameliorate the unavoidable impacts to the area. This mitigation package must account for not only the habitat lost but also the degradation of the quality of the experience of visitors to the Foster / Marsh Island wetland complex.

Any alternative will add significant width to the existing roadway at various points along the corridor. Land that was previously available for recreation will now be compromised. A replacement of this useable space and experience must be part of the mitigated package. For instance, the images below compare the quality of green space on the WSDOT peninsula before and after the creation of proposed ramps and the changes that will result under SR 520 (mainline) to maintain connection from the Arboretum and the Marsh Island.



Current conditions WSDOT peninsula



Proposed conditions WSDOT peninsula (artist Interpretation)



Current Tunnel ~72 feet



Proposed crossing (artist interpretation)

C-030-011

While Seattle Audubon has not chosen a preferred alternative we are steadfast in our decision to **oppose** the Pacific Street Interchange Alternative. We feel the impacts created by the Pacific Street Interchange on the environmental quality of the Foster / Marsh Island wetland complex will be significant and more importantly **avoidable** by choosing another option. The Pacific Street Interchange Alternative on the surface may be beneficial to traffic impacts to the Montlake neighborhood, but Seattle Audubon does not believe these benefits **outweigh** the environmental and experiential impacts that will be forced upon citizens of Washington and specifically visitors to the Foster / Marsh Island wetland complex. In addition, we do not see enough evidence that the traffic impacts will actually be minimized. How unfortunate would it be if we chose an alternative that severely impacted the Foster / Marsh Island wetland complex **and** did not solve neighborhood impacts either?

Marsh Island, one of the last remaining forested wetlands in our region, would take the brunt of the impacts created by the Pacific Street Interchange. The Pacific Street Interchange would place at least four columns directly on Marsh Island. It would also require the removal of a large portion of the existing vegetation and prevent trees and other vegetation from reaching maturity, due to shading and direct conflicts. The walking trails on the island would have to be removed or be altered to ensure a safe passage under the roadway. The massive infrastructure over the island will dramatically alter the habitat, most likely completely displacing the current populations of birds and other wildlife. The DEIS does not adequately address impacts resulting from the Pacific Street Interchange.



What grows under an overpass and what will Marsh Island look like with one of these bisecting it?

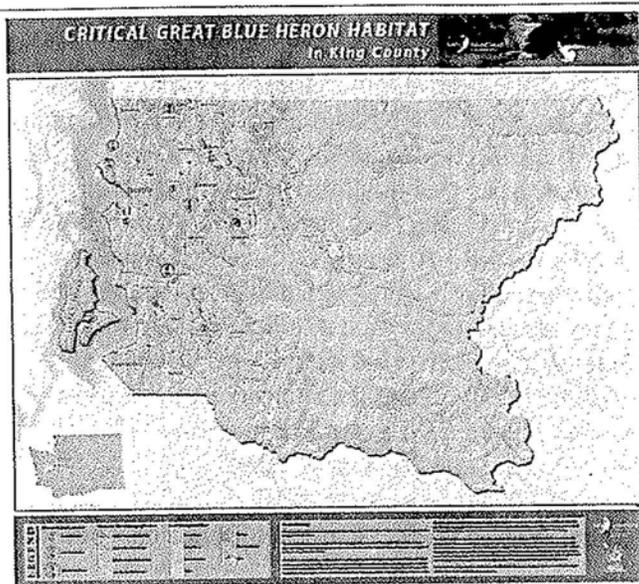
## Environmental Impacts

The area around the Arboretum, Foster / Marsh Islands, and the Montlake Natural Area are rich in bird diversity. In the fall and winter you may see hundreds of American Coots floating in the wetlands or catch a glimpse of a solitary American Bittern. The area supports huge congregations of waterfowl as well as smaller groupings of birds and solitary residents. All of this adds up to an extremely diverse complex of habitats. There is no doubt these habitats will be impacted by the SR 520 bridge replacement. However, the DEIS needs to better address how each alternative will impact habitat in the area and what specific mitigation measures would be needed under each alternative. The impacts of the 6-lane, 4-lane and Pacific Street Interchange alternative would have dramatically different impacts on birds and wildlife, but the DEIS only looks at direct wetland filling or vegetation loss. How can an informed decision on a preferred alternative be made without a complete understanding of the environmental impacts of each?

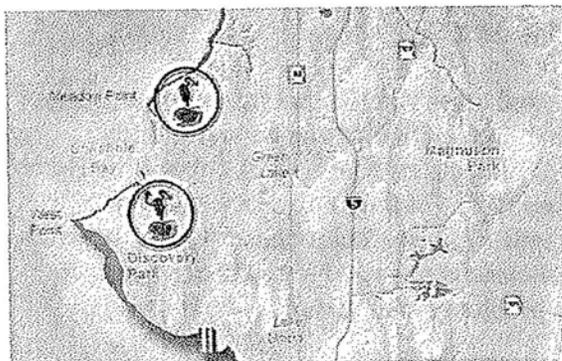
- How will a bridge deck that bisects Marsh Island and shades part of the island impact habitat?
- Vegetation is much more than re-planting. What areas cannot be re-planted because of bridge deck shading? How much habitat is lost because it will be under bridge decks?

Chapter two of the DEIS introduces the birds and other wildlife that frequent the area in and around the SR 520 bridge project. The text highlights Bald Eagles and salmon because of their endangered status. The text also identifies Kingfishers, Great Blue Heron and several other species of birds that are important to our region and use the area. However, the DEIS does not address what impacts might occur to these species, nor does it provide a direct comparison of any of the alternatives as to their potential impacts to birds or other wildlife. This presents a major problem in our view.

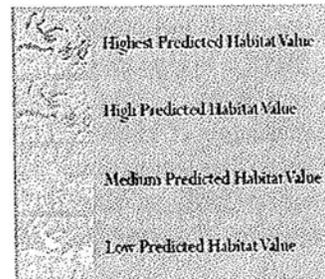
Over the last two years Seattle Audubon has conducted a study on the nesting and foraging habitat of the Great Blue Heron. We have conducted this study in partnership with the Cascade Land Conservancy and CommEn Space to identify the remaining critical habitat of this unique and charismatic bird. Attached is a map of the results of King County and a magnified view of Seattle. As identified on the map there are very few areas of critical habitat for the Great Blue Heron left in Seattle. Two of the most contiguous areas of critical habitat include Foster Island and the area near Discovery Park. SR 520 will potentially impact the Great Blue Heron in significant ways, yet the DEIS does not adequately address this issue. How much foraging area will be lost due to the new SR 520 configuration? What is the likely outcome if the Great Blue Heron is displaced from the Foster Island foraging area?



Seattle Audubon's Critical Heron Habitat Map for King County



Enlargement of Seattle Area Critical GBH Habitat



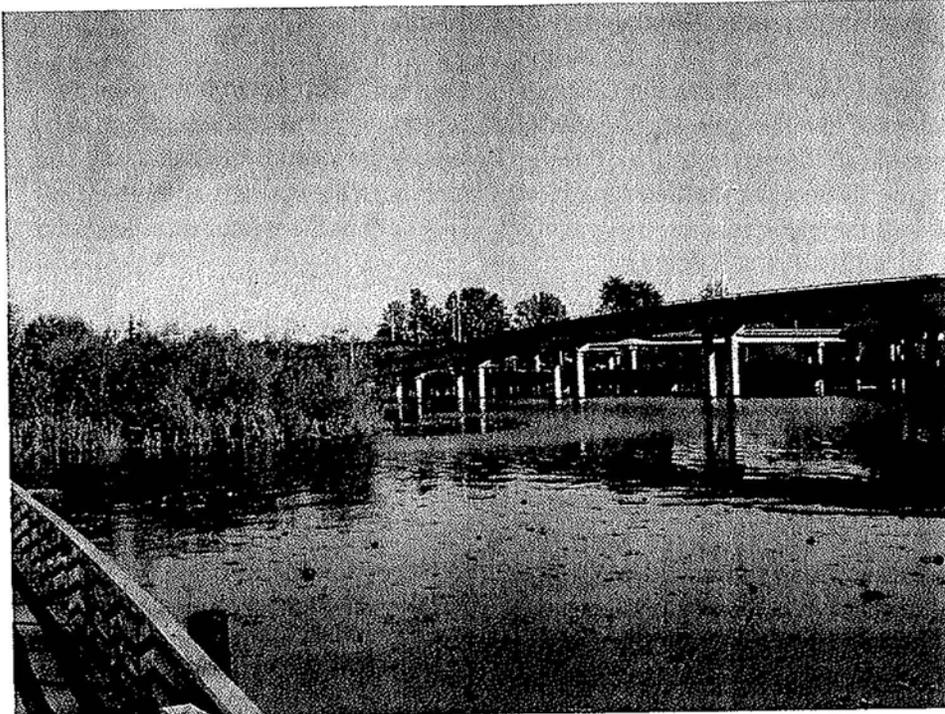
Legend for Great Blue Heron Maps

C-030-013

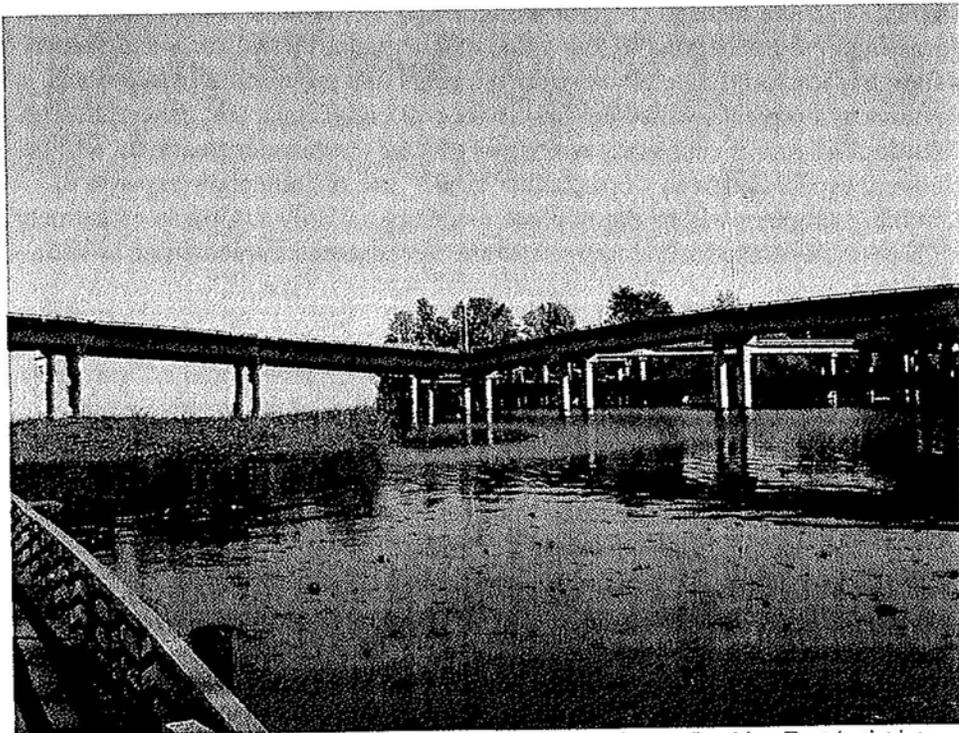
The DEIS focuses on a very narrow definition of environmental impacts. The main discussion admits that the project (any alternative) will fill wetlands and remove vegetation. It is however, quick to point out that filling of wetlands will be kept to a minimum and vegetation will be replanted. This simplistic discussion misses the importance of discussing and understanding habitat, habitat relationships, fragmentation, barriers and other factors that disrupt wildlife life-cycles and the ecological function of the Foster / Marsh Island wetland complex. The questions we need to ask regarding environmental impacts are:

- What wildlife will be displaced, permanently or temporary?
- What changes in habitat will result from vegetation removal?
- How will the increase in road width and infrastructure impact habitat?

We need to ask these questions because the Foster / Marsh Island wetland complex is rich in species diversity and provides unique niche habitat in our urban environment.



Current Conditions: Marsh Island Looking East



Proposed Conditions: Marsh Island with Pacific Street Interchange: Looking East (artist interpretation)

### Other Environmental Impacts (Stormwater and Shading)

C-030-014 | The functional details of the stormwater treatment are not sufficient enough to make an informed criticism of the alternatives. No scientific literature is referenced and there is no objective discussion of the performance or design details of the stormwater treatment basins. The unique stormwater treatment basins are small intricate systems at the base of columns. How will the plant material be kept alive, especially in the winter months when the most need for mitigation will occur?

C-030-015 | WSDOT has also referred repeatedly that because the bridge deck will be higher there will be less impacts as a result of shading. Once again no scientific literature is referenced and no quantifiable evidence is provided. The bridge decks will be higher, but they will also be much wider. What are the shading impacts of a wider deck? How many acres of wetlands and land in general will be covered by new bridge decking? How much of this impact is in addition to the current conditions?

C-030-016 | Another critical issue that will dramatically impact the success or failure of environmental mitigation is the commitment of WSDOT in seeing these mitigation elements through to completion. On page 5-6 of the DEIS WSDOT states that "the stormwater treatment wetland could be a positive feature to viewers." It illustrates a constructed wetland of high natural diversity. Indeed this type of wetland would be an asset, but there are numerous studies that point to the need for a long-term monetary and time commitment to ensure wetland creation is successful. It would be just as easy to end up with a stormwater treatment pond of low value that degrades the viewer's experience. Seattle Audubon has learned tough lessons over the years that promised mitigation and aesthetic additions to a project are also the first to receive budget cuts and general design cut-backs. Seattle Audubon is cautiously optimistic that the stormwater treatment will be a positive element, especially given word choice "could" and the monetary expense of this project. What guarantees will be put in place to ensure not only stormwater treatment ponds but all aspects of aesthetics and mitigation are designed and implemented to their fullest?

### Cultural and Visual Impacts

C-030-017 | The SR 520 bridge project at the very least will create a wider roadway and considerably more concrete and infrastructure. How will the alternatives impact the experience of canoeists and other recreationalist who utilize the Foster Marsh Island wetland complex? How much of their canoeing experience will be under bridge decks and other infrastructure? How many visitors rent canoes and kayaks each year from the University of Washington Aquatics Center and surrounding outfitters? What will be the experience of visitors to the University of Washington Aquatics Center if the Pacific Street Interchange is selected verses the other alternatives? The quality of the visitor's experience to the Arboretum and Foster / Marsh Island wetland complex has not been considered. This area is a highly used and important recreational area for students, families and the general population of Seattle and the region. This area is also part of the original Olmsted Plan, a historic feature of Seattle. An alternative that solves the needs of moving people must be balanced with preserving the quality of the environment and the

C-030-017

quality of the experience of the Foster / Marsh Island wetland complex. Seattle Audubon does not feel the DEIS has achieved this purpose. We are therefore reiterating our request that a full Section 106 be conducted to review and document the effects of the SR 520 Project on Washington Park and Arboretum, Lake Washington Boulevard, University of Washington Campus and the Foster / Marsh Island recreation area, all significant Olmsted cultural landscapes, which are all eligible for National Register of Historic Places and are adversely impacted by all proposed 520 alternatives. Seattle Audubon also requests to be included as a consulting party to the Section 106 review and any related Memorandum or Programmatic Agreement.

**Summary**

The four main points of Seattle Audubon's comments are:

C-030-018

1. To ensure that an adequate mitigation package is formed as part of the SR 520 bridge project that addresses long-term monetary and maintenance commitments.

C-030-019

2. Further research and investigation is needed on the performance of the new stormwater basins, habitat impacts to the Great Blue Heron and habitat loss as a result of shading.

C-030-020

3. Seattle Audubon strongly opposes the Pacific Street Interchange. This alternative will dramatically and severely impact Marsh Island and the entire Foster / Marsh Island wetland complex.

C-030-021

4. A Section 106 should be conducted on all historically significant areas and a more detailed documentation of the visitor's **experience** of these areas should be studied. Mitigation for the SR 520 project has to go beyond the 3:1 wetland replacement and examine the quality of life impacts to the thousands of visitors to the Arboretum, University of Washington Aquatics Center and the general areas around Foster and Marsh Islands.

Thank you for the opportunity to comment.

Sincerely,



Matthew Mega, AICP  
Urban Habitat Director

CC: Governor Chris Gregoire, Mayor Greg Nickels and Seattle City Councilmembers

J. RICHARD ARAMBURU  
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505 Madison Street, Suite 209  
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October 30, 2006

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



Re: *DEIS for SR 520 Bridge Replacement*  
Pedestrian/Bicycle Connection at Madison Park

Dear Mr. Krueger:

We write to supplement earlier comments submitted on behalf of SWAMP – Save the Wetlands of the Arboretum from Multitudes of People. Those earlier comments dated September 22, 2006 demonstrated why an additional pedestrian/bicycle connection at 37<sup>th</sup> Ave. East would violate NEPA, SEPA, the Clean Water Act, the federal Department of Transportation Act and Seattle’s Critical Areas Ordinance, and would unnecessarily exacerbate environmental impacts of the bridge.

We write now to provide the results of a year long wildlife study comparing the relative impacts of proposed pedestrian/bicycle connections at 43<sup>rd</sup> Ave. East and 37<sup>th</sup> Ave. East. The enclosed study, *Plant and Animal Studies Along Two Proposed Bike Trail Routes: SR 520 Bridge to Madison Park* (September 2006) was prepared by wildlife biologists at Raedeke Associates, Inc. and concludes that the 37<sup>th</sup> Ave. East street end and near shore environment provide substantially greater abundance and diversity of plants and animals than the 43<sup>rd</sup> Ave East street end. This report supplements the earlier *Wetland and Wildlife Assessment* prepared by Raedeke Associates in August 9, 2005. To be sure that it is part of the EIS comment record, I have also included a copy of Raedeke’s 2005 report.

As you can see at Tables 1 - 3, the 2006 Raedeke study is based upon the collection of data at the two sites between October 2005 and September 2006 and concludes that for all seasons the 37<sup>th</sup> Ave. East street end provides far greater numbers and diversity of bird species than the 43<sup>rd</sup> Ave. East site. Accordingly, the impacts of pedestrian/bicycle connection at 37<sup>th</sup> Ave. East would be substantially greater than at 43<sup>rd</sup> Ave. East.

We request that this study be included with the *Draft EIS on the SR 520 Bridge*

C-031-001

Paul Krueger  
October 30, 2006  
Page 2

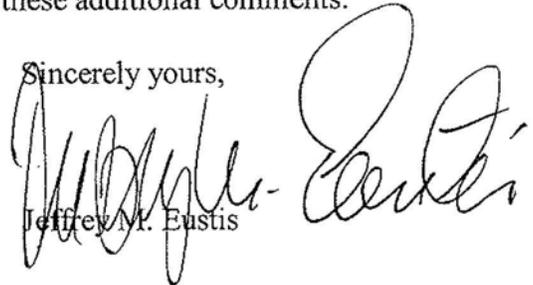
C-031-001

*Replacement* and in particular with the *Madison Park Bicycle/Pedestrian Path Options Technical Memorandum*. The enclosed study fills two obvious gaps in the *Technical Memorandum*: 1) it provides objective data supporting the relative abundance and diversity of plant and bird species at the two sites; and 2) it offers an objective basis for comparing the relative impacts of pedestrian/bicycle bridges at those sites.

Under NEPA, SEPA, the Clean Water Act, the federal Department of Transportation Act and Seattle's Critical Areas Ordinance the state is obliged to select alternatives of lesser impact. The enclosed wildlife study, together with Raedeke's earlier *Wetland and Wildlife Assessment* (August 9, 2005) clearly demonstrate 43<sup>rd</sup> Ave East to be the connection of lesser impact. Nonetheless, SWAMP continues to question the justification for either pedestrian/bicycle connection, given their projected costs and the existence of other connections with far fewer environmental impacts.

SWAMP appreciates your consideration of these additional comments.

Sincerely yours,



Jeffrey M. Eustis

JME/km  
cc: SWAMP

**PLANT AND ANIMAL STUDIES ALONG  
TWO PROPOSED BIKE TRAIL ROUTES:  
SR 520 BRIDGE TO MADISON PARK**

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**Final Report to: S.W.A.M.P  
King County, Washington**

**September 28, 2006**

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**RAEDEKE ASSOCIATES, INC.**

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Project Manager:

Dale R. Herter, M.S.  
Associate/Wildlife Biologist

Project Personnel:

Joel W. Merriman, M.S.  
Wildlife Biologist

Lisa J. Danielski, B.S.  
Wetland Ecologist and Botanist

## **INTRODUCTION**

This report documents our observations on numbers and diversity of birds and vegetation studied at the two proposed bike trail routes from the new SR 520 Bridge and the Madison Park neighborhood. We comment on differences in numbers and diversity of birds at each location and contrast this diversity to other sites on Lake Washington. Avian studies were completed from October 2005 through September 2006. Vegetation transect data were gathered in October 2005.

## **METHODS**

### **Bird Observations**

We conducted twice-monthly observations of all water birds and land birds seen within the proposed bike trail routes at both the 37<sup>th</sup> Avenue East (hereafter 37<sup>th</sup> Avenue) street end and the 43<sup>rd</sup> Avenue East (hereafter 43<sup>rd</sup> Avenue) street end. We observed birds for 1 hour consecutively at each location beginning in mid-October and continuing through late December. Observations were taken from docks and/or in a canoe or row-boat to observe all areas that could be affected by the bike routes. The starting time for observations varied from early morning to late afternoon to span the time of day that birds could be using the affected areas. We also alternated starting locations between the 37<sup>th</sup> Avenue end and the 43<sup>rd</sup> Avenue end between visits.

Birds were first observed from land prior to moving into each area with a canoe or row-boat because some birds flushed from the observation areas once the watercraft was launched. We included all birds seen, even though some birds flying over the sites may not have been directly associated with the sites, however some flying birds were foraging from the air over the sites. Both areas are approximately equal in size and include all habitats (on land or water) that could be impacted by the routes and a 100-meter disturbance envelope on each side of the proposed trails.

### **Vegetation Transects**

We documented the vegetation present along both bike trail routes using 200-meter long transects with twenty 1-meter<sup>2</sup> plots taken at 10-meter intervals along each transect line. We used a canoe to access shallow lakebed and wetland areas. We estimated plant cover using a 1-meter<sup>2</sup> plot frame made of detachable PVC tubing that floated on the water. We took visual estimates of percent area of plant cover on each plot and included all layers, from below the water surface to tree branches hanging over the plot grid. Measurements were taken on 19 October 2005, prior to major senescence of forbs and aquatic plants. We did not sample street-side areas along each street because most of the plants in these areas were ornamentals planted on private lots.

## RESULTS

### Birds

The diversity of bird species was generally greater at the 37<sup>th</sup> Avenue E observation site than at the 43<sup>rd</sup> Avenue E site during most of the 24 survey visits (Table 1). On only one visit (9 February 2006) did we count the same number of bird species on each route. On a few visits we counted fully twice the number of bird species at the 37<sup>th</sup> Avenue site than at the 43<sup>rd</sup> Avenue site. We observed several nesting birds at the 37<sup>th</sup> Avenue site, including successful nesting by mallards, gadwalls, wood ducks, song sparrows, cedar waxwings, and bushtits which all produced broods of young in the vicinity. There is a greater diversity of habitats for birds present in the 37<sup>th</sup> Avenue area, including a small area of native forest, emergent shrubby and herbaceous wetlands, and floating and submerged aquatic vegetation over a shallow lake bed. These areas provide safe feeding and nesting sites that are removed from regular human disturbance.

Habitat in the vicinity of the 43<sup>rd</sup> Avenue street end is mostly non-native suburban yards bordering a gravelly lakeshore that slopes rather steeply to deep water. Water birds that dive for food (such as grebes and diving ducks) were the only group that appeared to be more common at the 43<sup>rd</sup> Avenue site, while shallow water dabbling ducks, raptors, shorebirds, and native wetland and woodland birds were more common and diverse (more species present) at the 37<sup>th</sup> Avenue site. The only nest we observed at the 43<sup>rd</sup> Avenue site was that of a green heron initiating a nest in shore side trees which eventually failed due to crow predation. Broods of starlings, house sparrows, and white-crowned sparrows were also observed at the 43<sup>rd</sup> Avenue site. The site receives greater boat traffic and regular human disturbance from the nearby apartments and condominiums.

Overall, we counted 2693 birds of 77 species at the 37<sup>th</sup> Avenue site over the entire year, while counting 1634 birds of 52 species at the 43<sup>rd</sup> Avenue site during the same time period. Tables showing our survey results are presented in Table 2.

### Vegetation

Vegetation was more diverse on transects from the 37<sup>th</sup> Avenue street end than from the 43<sup>rd</sup> Avenue street end. Again, the wetland edge, and shallow lake bed at the 37<sup>th</sup> Avenue site provides better growing conditions for a variety of plants than does the rather deep lake bed and wind-washed shore at the 43<sup>rd</sup> Avenue site. Native terrestrial vegetation was also generally more abundant in the 37<sup>th</sup> Avenue area than in the 43<sup>rd</sup> Avenue area. The introduced white water-lily dominates aquatic habitats in this area, but it appears to provide similar habitat for water birds as does the species it replaced, the native yellow water lily. We found that the submergent plant community was not dominated by the introduced Eurasian water milfoil, but was dominated by native plants, which provide food for the large flocks of common coots and other waterfowl which used the site in abundance during the non-breeding season.

Tables 3 provides a summary of the results of our vegetation transects. This table shows an average percent cover over the entire transect at each location for all species we encountered.

### **Other Species**

In addition to birds, we observed individual beaver, muskrat, and river otter using the 37<sup>th</sup> Avenue site on at least 3 days. We observed one muskrat on 1 day at the 43<sup>rd</sup> Avenue site.

### **DISCUSSION**

Our studies at the two proposed bike trail routes indicate that the 37<sup>th</sup> Avenue route, in general, provides more important habitat for birds than does the 43<sup>rd</sup> Avenue route. The preponderance of native terrestrial vegetation, the extensive shallow emergent and floating plant communities, the overall variety of habitat types, and the isolation from human disturbance all combine to make this portion of the Lake Washington shore at the 37<sup>th</sup> Avenue street end an unusually diverse habitat area for birds.

The street end, although public, is used by only a few people during each day, generally hikers and picnickers from local neighborhoods. This provides a little-disturbed corner of the Foster Island wetlands where water birds and raptors, in particular, can find loafing sites free of frequent human intrusion. The site appears to be an important feeding area for flocks of waterfowl that winter on Lake Washington. Fish-eating birds such as grebes and cormorants also commonly use the site, feeding on both native and introduced fish species that often compete or predate on native salmon fingerlings. Human disturbance, particularly if irregular and unpredictable, and by humans outside of vehicles (which is more threatening to the animals) such as a trail, tends to be more disturbing to wildlife than regular, non-threatening structures such as an elevated roadway or other structure with regular vehicle traffic.

Terrestrial and wetland thickets such as those at the 37<sup>th</sup> Avenue street end are now rare on Lake Washington and provide safe nesting sites for several bird species during the spring and summer, and appear to be only infrequently used by American crows, a common nest predator in the Seattle area. Migrant songbirds also use the site both in spring and fall, where the dense waterside vegetation provided good foraging for migrating insectivorous birds.

Lake Washington in general is characterized by urbanized shorelines, docks and marinas, and non-native urban plantings. The 37<sup>th</sup> Avenue street end provides habitat for birds that is rare today along the lake shore. The 43<sup>rd</sup> Avenue site, in contrast, provides habitats that are common along Lake Washington. The lawns and ornamental plantings at this street end, and the generally steep lake bed are both common habitats found on the shorelines of the lake. The lower numbers and diversity of birds at this site is typical of that found along the remainder of lake, except for those few areas where natural wetland fringes predominate, such as the Foster Island wetland complex and the Mercer Slough area on the east side of the lake.

## **SUMMARY**

Although the 43<sup>rd</sup> Avenue street end does provide habitat for some bird species, both numbers and diversity appear to be much lower than in the vicinity of the 37<sup>th</sup> Avenue street end. This pattern of abundance and diversity of birds between the two sites persists throughout the year and encompassed all 4 seasons studied. Impacts from a proposed bike trail are anticipated to be greater on native vegetation, wildlife habitat, and bird populations at the 37<sup>th</sup> Avenue site than at the 43<sup>rd</sup> Avenue site.

## **Limitations**

The determination of ecological system classifications, functions, values, and risk assessments is an inexact science, and different individuals and agencies may reach different conclusions. We cannot guarantee the outcome of such determinations. Therefore, the conclusions of this report should be reviewed by the appropriate regulatory agencies.

We warrant that the work performed conforms to standards generally accepted in our field, and prepared substantially in accordance with current technical guidelines and criteria. The conclusions of this report represent the results of our analysis of the information provided by project proponent and their consultants, together with information gathered in the course of the study. No other warranty, expressed or implied, is made.

Table 1.  
**Bird Observations at Alternative Routes for the Proposed SR 520 Bike Trail to Madison Park  
37th Avenue E. Route**

	19-Oct	26-Oct	9-Nov	22-Nov	12-Dec	29-Dec	10-Jan	26-Jan	9-Feb	23-Feb	9-Mar	23-Mar	11-Apr	26-Apr	12-May	26-May	9-Jun	29-Jun	7-Jul	27-Jul	7-Aug	23-Aug	8-Sep	23-Sep	Total	Average	
<b>Oct. 2005 - Sep. 2006</b>																											
<b>Total Number of Birds</b>	86	60	114	240	97	202	276	161	125	85	104	98	108	58	75	61	77	73	85	84	60	113	138	113	2693	112	
Total No. Water Birds	75	51	99	233	89	183	175	123	73	74	63	61	62	31	11	14	22	20	28	17	17	30	41	76	1668	70	
Total No. Land Birds	11	9	15	7	8	19	101	38	52	11	41	37	46	27	64	47	55	53	57	67	43	83	97	37	1025	43	
<b>Number of Species</b>	20	17	23	18	16	19	26	27	15	19	28	27	26	20	30	24	24	23	23	22	14	20	21	25	77	24	
No. Water Bird Species	12	13	12	13	12	11	14	10	10	11	13	11	10	9	5	5	5	6	5	5	5	7	8	12	30	10	
No. Land Bird Species	8	4	11	5	4	8	12	17	5	8	15	16	16	11	25	19	19	17	18	17	9	13	13	13	47	14	

**43rd Avenue E. Route**

	19-Oct	26-Oct	9-Nov	22-Nov	12-Dec	29-Dec	10-Jan	26-Jan	9-Feb	23-Feb	9-Mar	23-Mar	11-Apr	26-Apr	12-May	26-May	9-Jun	29-Jun	7-Jul	27-Jul	7-Aug	23-Aug	8-Sep	23-Sep	Total	Average	
<b>Oct. 2005 - Sep. 2006</b>																											
<b>Total Number of Birds</b>	67	78	24	58	302	38	58	75	52	86	55	95	59	28	23	51	45	57	52	44	38	106	108	35	1634	68	
Total No. Water Birds	48	72	18	46	297	26	51	61	45	84	48	74	46	9	4	22	23	21	29	16	6	17	10	23	1096	46	
Total No. Land Birds	19	6	6	12	5	12	7	14	7	2	7	21	13	19	19	29	22	36	23	28	32	89	98	12	538	22	
<b>Number of Species</b>	15	16	8	13	14	4	13	13	15	15	16	18	16	11	12	14	14	17	12	11	12	17	12	13	52	15	
No. Water Bird Species	12	12	6	8	12	3	10	10	12	14	12	13	11	6	3	4	7	5	3	3	4	4	2	7	27	8	
No. Land Bird Species	3	4	2	5	2	1	3	3	3	1	4	5	5	5	9	10	7	12	9	8	8	13	10	6	25	7	

Table 2.

**Abundance and Frequency of Birds Encountered at the Two Proposed Bike Paths**

Species	37th Ave. 43rd Ave.		37th Ave. 43rd Ave.	
	Number Encountered		Frequency of Occurance	
<b>WATER BIRDS</b>				
Pacific Loon		1		4%
Western Grebe		10		17%
Red-necked Grebe		4		13%
Pied-billed Grebe	40	22	67%	58%
Horned Grebe	2	2	4%	8%
Double-crested Cormorant	25	43	50%	50%
Great Blue Heron	21	2	63%	8%
Green Heron		3		8%
Canada Goose	79	121	50%	67%
Mallard	117	49	88%	50%
Northern Pintail	2		4%	
Northern Shoveler	3		8%	
American Wigeon	21	4	25%	8%
Gadwall	110	14	67%	29%
Green-winged Teal	17		29%	
Wood Duck	61	3	63%	8%
Ring-necked Duck	181	148	46%	42%
Bufflehead	178	133	54%	58%
Canvasback		8		8%
Greater Scaup	1	5	4%	13%
Lesser Scaup	63	87	42%	42%
Common Goldeneye		19		38%
Surf Scoter		1		4%
Common Merganser	6	14	17%	25%
Red-breast. Merganser	1		4%	
Hooded Merganser	3		4%	
American Coot	657	289	63%	42%
Virginia Rail	1		4%	
Sora	1		4%	
Killdeer	2		4%	
Spotted Sandpiper	2		4%	
Mew Gull	6	2	13%	8%
Ring-billed Gull	32	26	46%	54%
California Gull	1	14	4%	13%
Glaucous-winged Gull	25	69	67%	75%
American Herring Gull	2		8%	
Belted Kingfisher	8	3	33%	13%

Table 2 (cont.)

	37th	43rd	37th	43rd
LAND BIRDS	Number Encountered		Frequency of Occurance	
Bald Eagle	6		21%	
Red-tailed Hawk	2		8%	
Cooper's Hawk	1		4%	
Sharp-shinned Hawk	1		4%	
Peregrine Falcon		1		4%
Rock Pigeon	36	53	54%	54%
Band-tailed Pigeon		1		4%
Vaux's Swift	41	45	17%	8%
Anna's Hummingbird	24		71%	
Northern Flicker	5		17%	
Downy Woodpecker	17		54%	
Western Wood Pewee	2	1	8%	4%
American Crow	63	48	96%	79%
Steller's Jay	1	2	4%	8%
American Robin	67	22	67%	29%
Brown Creeper	1		4%	
Bewick's Wren	19	4	54%	13%
House Wren	1		4%	
Marsh Wren	13	1	42%	4%
Red-breasted Nuthatch	2		4%	
Black-capped Chickadee	93	18	92%	42%
Chestnut-backed Chickadee	1		4%	
Bushtit	41	23	50%	21%
Purple Martin	1		4%	
Barn Swallow	52	40	29%	42%
Cliff Swallow	120	46	38%	33%
Violet-green Swallow	10	24	21%	29%
Ruby-crowned Kinglet	7		21%	
Golden-crowned Kinglet	2		8%	
Cedar Waxwing	18	2	29%	4%
European Starling	138	98	46%	42%
Warbling Vireo	3		13%	
Orange-crowned Warbler	1		4%	
Wilson's Warbler	3		8%	
Yellow Warbler	2	1	8%	4%
Yellow-rumped Warbler	5		8%	0%
Song Sparrow	46	4	88%	17%
White-crowned Sparrow	1	13	4%	25%
Dark-eyed Junco	6	1	13%	4%
Spotted Towhee	4		13%	
Black-headed Grosbeak	2		8%	
House Finch	55	19	63%	29%
Purple Finch	1		4%	
American Goldfinch	31	12	54%	4%
Western Tanager	1		4%	
Brewer's Blackbird	4		4%	
Red-winged Blackbird	71	6	79%	8%
Brown-headed Cowbird	3		4%	
House Sparrow	1	53	4%	63%
<b>TOTAL</b>	<b>2693</b>	<b>1634</b>		

Table 3.  
**Average Percent Plant Cover of Species Encountered on the Two Bike Path Routes**

Species	37th Avenue E.	43rd Avenue E.
<b>Trees and Shrubs</b>		
Black Cottonwood	1.25	
Oregon Ash		0.05
Scouler's Willow	1.50	
Sweet Cherry	1.05	
European Holly	0.20	
English Laurel		0.75
Butterfly Bush		1.75
Himalayan Blackberry	8.20	1.00
English Ivy	0.40	1.25
European nightshade	1.25	
Pacific Willow	0.05	
<b>Herbs and Grasses</b>		
Giant Horsetail	1.50	
Field Bindweed	0.50	
Creeping Buttercup	0.50	
Small Bedstraw	0.25	
Small-flowered Forget-me-not	3.25	
Dovefoot Geranium	0.05	
Seaside Trefoil	0.05	
Primrose	0.05	
Beggarticks	0.10	
Tufted Vetch	0.05	
Common Dandelion	0.05	
Hawkweed	0.05	
Bluegrass	5.25	
Sweet Vernalgrass	0.25	
Velvetgrass	0.50	
Tall Fescue	0.25	
Ryegrass	0.35	
<b>Aquatics</b>		
White Water-lily	30.75	
Common Duckweed	1.25	
Purple-fringed Riccia	0.20	
Coontail	11.30	
Eurasian Water-milfoil	0.15	0.05
Grassy Pondweed	0.05	
White-stalked Pondweed		0.25
Northern Water Horehound	0.55	
Common Cattail	3.50	
Common Rush	2.50	



August 9, 2005

Mr. David Allen, Senior Planner  
Seattle Department of Transportation  
P.O. Box 34196  
Seattle, WA 98124

RE: State Route 520 Proposed Bicycle Trail  
Wetland and Wildlife Assessment  
(RAI Project No. 2005-048-001)

Dear Mr. Allen:

This document provides an initial assessment of the effects on wetland and wildlife resources of the proposed bicycle trail access points in the Madison Park neighborhood. The proposed trail is associated with the future replacement and widening of the State Route (SR) 520 bridge across Lake Washington, for which all proposals include a bicycle/pedestrian trail running along the length of the new bridge (Draft EIS prepared under the direction of the Washington Department of Transportation; CH2M Hill 2005). A connection to the Madison Park neighborhood is being proposed by interest groups seeking access for pedestrians and cyclists to the new SR 520 bridge.

The author of this summary letter is a professional wildlife biologist with 17 years of experience in the Seattle area and who has lived near the Madison Park neighborhood for that same period of time. Many of the observations used in this letter are based on 17 years of observations in and near the site of the proposed bike trail access routes.

## **BACKGROUND**

As of summer 2005, a Draft Environmental Impact Statement (DEIS) concerning replacement and widening of the SR 520 bridge was prepared by CH2M Hill (2005) and other consultants, and is now under public review. This document addresses environmental concerns surrounding the replacement and widening of the SR 520 bridge. Outside of the DEIS current scope, but potentially to be included in the EIS, is a proposal for a connection to the planned SR 520 pedestrian/bicycle trail that is anticipated to link the Madison Park neighborhood directly to the bridge via the 37<sup>th</sup> Avenue E street-end or the 43<sup>rd</sup> Avenue E street-end (see Figure 1). Both of these trail locations would transfer bicycle traffic from the SR 520 bridge onto side-streets in the northern portion of the Madison Park neighborhood.

The 37<sup>th</sup> Avenue E route would involve construction of a causeway to support the bicycle trail over shallow open water and a wetland complex located east of Foster Island and north of the Broadmoor Golf Course (Figure 1). A 43<sup>rd</sup> Avenue E route would also

Mr. David Allen, Sr. Planner  
August 9, 2005  
Page 2

involve construction of a causeway across shallow open water but would not affect any wetlands identified in the City of Seattle Environmentally Critical Areas ordinance.

## EXISTING CONDITIONS

### *Wetlands*

The area around the 37<sup>th</sup> Avenue E street-end consists of a gravel-surfaced, one-lane street leading to a small wooden dock maintained by the City of Seattle. This dock is used by occasional canoeists and kayakers to access the canoe trail in the Foster Island area. Two private residence are immediately east of the street, and the outer fence surrounding the Broadmoor Golf Course is immediately west of the street. The street-end itself is in a small grove of cottonwood trees adjacent to aquatic bed wetlands which surrounds the dock. Immediately adjacent to the dock is a white water lily/Eurasian milfoil plant community. Approximately 75 feet off the end of the dock are emergent and scrub/shrub wetland communities.

The wetland complex near the 37<sup>th</sup> Avenue E route is designated as an Environmentally Critical Area by the City of Seattle, Department of Planning and Development (DPD). According to Seattle Municipal Code, an Environmentally Critical Area may include: (1) geologic hazard areas, (2) flood-prone areas, (3) riparian corridors, (4) wetlands, (5) fish and wildlife habitat conservation areas, and (6) abandoned land-fills. The wetland that would be affected by the 37<sup>th</sup> Avenue E route is a complex lake-fringe wetland consisting of aquatic bed submerged and floating plants, shallow water emergents, scrub-shrub, and forested wetland plant communities. All plant community types would be affected by the 37<sup>th</sup> Avenue E route. A description and abbreviated list of plants found in these plant communities follows:

*Aquatic bed:* This vegetation community occurs in shallow water with a mud or silt bottom dominated by the floating leaves of white water-lily (*Nymphaea odorata*) and pondweeds, (*Potamogeton* spp.) along with submerged aquatics such as Eurasian water-milfoil (*Myriophyllum spicatum*), coontail (*Ceratophyllum demerum*), and waterweeds (*Elodea* sp.).

*Emergent:* This community is composed of what is commonly referred to as open marsh vegetation dominated by cattails (*Typha* spp.) and bur-reeds (*Sparganium* spp.), with purple loosestrife (*Lythrum salicaria*) and yellow water flag, (*Iris pseudacorus*) also common.

*Scrub/Shrub:* A large part of the wetland consists of woody plants growing in saturated soils, dominated by hardhack spirea (*Spiraea douglasii*), willows (*Salix* spp.), red-osier dogwood (*Cornus sericea*), high-bush cranberry (*Viburnum edule*), and paper birch (*Betula papyrifera*).

*Forested wetland:* Dominated by an overstory of black cottonwood (*Populus balsamifera*), red alder (*Alnus rubra*), and Oregon ash (*Fraxinus latifolia*), with an

August 9, 2005

Page 3

understory of Indian plum (*Oemleria cersiformis*), common snowberry (*Symphoricarpos albus*), Himalayan blackberry (*Rubus discolor*), salmonberry (*Rubus spectabilis*), thimbleberry (*Rubus parviflorus*), and giant horsetail (*Equisetum telmateia*).

Based on field review in August 2005, we rated this wetland as a Category II wetland, following the Washington State Department of Ecology wetland rating system currently adhered to by the Seattle Department of Planning and Development [(DPD) formerly the Department of Construction and Land Use (DCLU)]. This indicates that it is a wetland that is difficult to replace, and which provides high levels of water quality, hydrologic, and/or wildlife habitat functions. Seattle DPD regulations require that any wetland determined to be an Environmentally Critical Area receive a 50-foot no entry buffer if development is proposed near the wetland. This buffer may be increased to 100 foot or possibly 125 feet if the wetland is determined to have high habitat value. The City of Seattle DPD has determined that this wetland is a “*wetland of exceptional value*” (Ms. Donna Talley, DCLU from the notes of a December 1, 1994 Inter-agency meeting). This designation was likely given because of the general lack of large, lake-fringe wetlands on Lake Washington and its overall value to local wildlife populations.

### ***Wildlife Habitat***

The wetland complex in the west Union Bay/Foster Island area constitutes some of the largest lake-fringe wetlands remaining on the shores of Lake Washington. This area is of significant wildlife habitat value and the abundance of birds and mammals provide recreational opportunities to city residents at all seasons. During the spring and summer, nesting waterfowl such as Canada geese, mallards, wood ducks, and American coots, as well as green herons, Virginia rail, red-winged blackbird, common yellowthroat, yellow warbler, song sparrow, and marsh wren attract the attention of canoeists and hikers using the nearby canoe trails and recreational trails in the area. In fall and winter, large groups of wintering waterfowl use the bay and associated wetlands as a feeding and refuge area. It is common in the winter to observe groups of dabbling ducks such as wood duck, mallard, northern pintail, gadwall, American wigeon, and green-winged teal, as well as coots and pied-billed grebes feeding in the wetlands, with larger flocks of diving ducks, including common and Barrow’s goldeneye, lesser scaup, canvasback, ring-necked duck, and bufflehead feeding in the protected, shallow waters surrounding the wetlands. The site is also used by a number of fish-eating species such as great blue heron, double-crested cormorant, western grebe, common and hooded merganser, and belted kingfisher.

During all seasons, a pair of bald eagle uses the site and has established at least three different nest trees in the immediate area (WDFW Broadmoor bald eagle territory #1979; see Figure 1). The easternmost nest tree is located on the Broadmoor Golf Course and is placed in a large crook of a tall Douglas fir. This nest is within 250 feet of 37<sup>th</sup> Avenue E and was active in 2005. The nest contained a nearly-fledged juvenile eagle based on field review in early August 2005. The other nest sites are major crooks in large black cottonwood trees and have both been active in recent years. The bald eagles regularly forage in the wetland complex, attracted to both fish and waterfowl prey common in the shallow waters. Red-tailed and Cooper’s hawk and osprey also regularly use the nearby

Mr. David Allen, Sr. Plai. r

August 9, 2005

Page 4

wooded areas and wetlands, respectively, for hunting. A red-tailed hawk nest has been reported near the area by Broadmoor Golf Course staff.

Also present in the wetland are signs of mammal activity, including beaver-cut trees and a recently active beaver lodge approximately 75 feet from the end of 37<sup>th</sup> Avenue E. There are also frequent sightings of muskrat, river otter, and mink by trail users in association with this wetland complex.

Lake-fringe wetlands also provide breeding and rearing habitat for several species of fish that are resident in Lake Washington, such as brown bullhead and pike-minnow. These species establish nest sites in very shallow waters, often in areas of submerged aquatic plants and floating aquatic plants. These fish in turn often become food for birds and migrating and resident salmonids such as coho, Chinook, and sockeye salmon, as well as bull and cutthroat trout.

## ASSESSMENT OF IMPACTS

### *Wetlands*

In the Development Standards for Wetlands in the City of Seattle's Environmentally Critical Areas regulations, Section 25.09.160, it states that, "No grading, filling, draining, and/or development shall be permitted within or over *wetlands of exceptional value* and its buffer as delineated by a survey accepted by the Director." The wetlands north of the 37<sup>th</sup> Avenue E street-end have been termed wetlands of exceptional value by a City employee (op. cit.) and their consultant (letter dated June 1, 1998 from Dyanne Sheldon to Kevin Stoops, Seattle Department of Parks and Recreation). Their value to local wildlife has been reiterated by both the Seattle Audubon Society (letter dated January 8, 1998 by Kit Walther to Seattle Department of Parks and Recreation) and the Washington Department of Fish and Wildlife (letter dated April 2, 1990 from Ted Muller to Carroll Smith, Seattle Engineering Department, and letter dated April 16, 1993 to Cheryl Chow, Seattle City Council). The uniqueness and potential for disturbance of wildlife in the wetlands north of the Broadmoor Golf Course has probably contributed to the failure of bike and pedestrian trail proposals linking the arboretum with the Madison Park neighborhood thus far (Galloway and Barker Architects 1997, City of Seattle Department of Parks and Recreation 1999).

The wetlands near the 37<sup>th</sup> Avenue E street-end are not unusual as far as the plant communities present, however the complexity of the wetlands and their large size are unique in this part of the city. Shoreline habitat along Lake Washington has been heavily affected by residential construction, lawns, dock construction, and public facilities such as marinas, parks, and roadways. Large lake-fringe wetland complexes are only found on Lake Washington at a few locations. Only two other large wetlands currently exist on the lake, one at Sammamish Slough near Kenmore, and the other at Mercer Slough near Factoria. Lake-fringe wetlands are important because they serve to protect adjoining uplands from erosive waves or currents along the margins of large water bodies. Vegetation along the shoreline helps dissipate energy from waves that otherwise could

Mr. David Allen, Sr. Planner

August 9, 2005

Page 5

erode beaches and upland areas. Lake-fringe wetlands also provide important habitat for wildlife such as amphibians and waterfowl. Vegetation in lake-fringe wetlands also can protect water quality in lakes by trapping and taking up sediments and pollutants that run-off from upland areas before they can enter the lake system.

Construction of an elevated causeway for a multi-use bicycle/pedestrian trail to 37<sup>th</sup> Avenue E would involve placement of a series of pilings into the lake bed and wetland habitats, with the resulting disturbance and shading of three or four different wetland plant communities, as well as shallow open water lake habitat. Because of its rating as a "wetland of exceptional value", a 125-foot buffer may be warranted for this wetland (Figure 1). An alternative location, construction of an elevated causeway to the 43<sup>rd</sup> Avenue E area, would involve construction over shallow open water lake habitat and suburban yards and would not affect wetlands or Environmentally Critical Areas.

In addition, other recreational opportunities other than hiking or biking at the site would likely be affected. In order to maintain a 5% grade on the bike trail from the proposed elevated western high-rise on the new SR 520 bridge, most of the 2500 block of 37<sup>th</sup> Avenue E may need to become a ramp, potentially eliminating public access to the dock and canoe routes in this area.

### *Wildlife*

The wetland complex north of the 37<sup>th</sup> Avenue E street-end provides a relatively undisturbed resting and feeding area for a number of wildlife species that are relatively rare in the Seattle urban environment. Wintering and breeding waterfowl, and aquatic mammals concentrate in this area because of the high habitat quality and lack of human disturbance. Wildlife in this wetland have become accustomed to steady artificial noise such as the traffic on the SR 520 bridge, and a low level of nearby human activity at adjacent lawns and docks, including infrequent boaters and canoeists. This particular arm of the lake, with a heavy cover of floating plants, very shallow water, and restricted access to the remainder of the lake because of the bridge deck, has created a refuge for wildlife due to the generally low levels of human use. Wildlife will often become accustomed to steady highway traffic, however, an elevated bicycle/pedestrian ramp as proposed, would incrementally increase local human disturbance levels because of the uneven and unpredictable nature of human presence on such a structure. Such disturbance and the presence of the structure itself may reduce or even preclude use of nearby habitats by some species of wildlife. Particularly affected would be flocks of wintering and breeding waterfowl which are easily flushed by close human approach and tend to abandon habitat that is frequently and unpredictably disturbed by human activity (Josselyn et al. 1988).

Because this area provides a refuge for waterfowl, it is undoubtedly used as a hunting area by the Broadmoor bald eagle pair. At the end of 37<sup>th</sup> Avenue E is a large cottonwood tree that is of sufficient size to provide a hunting perch for the eagles. This tree may have to be removed if the access ramp for the bike trail were to be built. Large

Mr. David Allen, Sr. Planner

August 9, 2005

Page 6

cottonwood trees are uncommon adjacent to the lake shore and wetlands of Union Bay and Foster Island, so this tree may be of particular value to this pair of eagles. The beaver lodge just off the end of 37<sup>th</sup> Avenue E would probably also have to be removed during construction of the ramp. An even larger lodge will probably be removed during construction of the SR 520 bridge, multiplying impacts to this species (CH2MHill 2005). If approval is given to build the access ramp (possibly up to 14 ft. wide), some aquatic bed habitat, emergent habitat, and scrub/shrub habitat would also be removed to install the ramp. Shading of these habitats and the ramp itself may preclude use of the habitats by most wildlife post-construction.

Construction of a new ramp for a bike trail from the end of 37<sup>th</sup> Avenue E would involve disturbance of wetland habitats and their buffers as described above. Extensive wetlands are rare on the Lake Washington shoreline and the remaining wetlands provide important habitat for many species of wildlife, including the threatened bald eagle. Avoidance of impacts by not constructing the causeway across wetlands would be the primary technique in minimizing or eliminating impacts to these critical habitats. Elevating a causeway for the bike trail would result in lesser shading affect, however disturbance of wildlife dependent on this wetland would remain a serious consideration.

## CONCLUSIONS

A route via the 37<sup>th</sup> Avenue E street-end would result in filling, shading, and disturbance to an important urban wetland and the relatively undisturbed wildlife habitat that it provides. The site is designated as a City of Seattle Environmentally Critical Area, and has been termed a "wetland of exceptional value", which may receive as much as a 125-foot buffer, indicating that avoidance and/or mitigation for loss of habitat would be difficult. An alternative route to the 43<sup>rd</sup> Avenue E street-end, while not the focus of this study, would likely result in lesser impacts to wetlands and wildlife habitat.

Sincerely,

RAEDEKE ASSOCIATES, INC.



Dale R. Herter, Wildlife Biologist

cc: S.W.A.M.P.(Save the Wetlands of the Arboretum and Madison Park)

Mr. David Allen, Sr. Plai. r  
August 9, 2005  
Page 7

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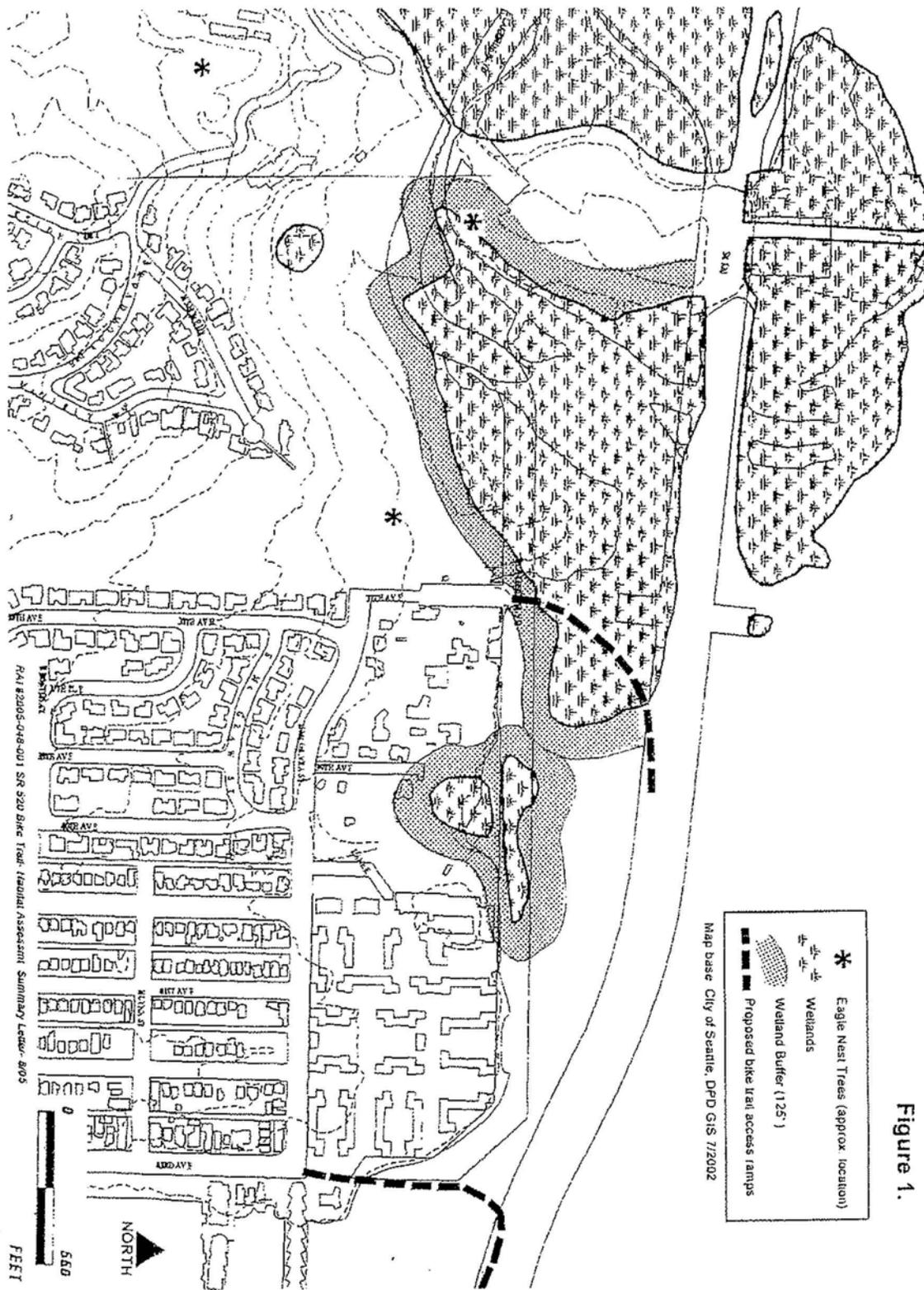


Figure 1.



**From:** [Jonathan Dubman](#)  
**To:** [SR 520 DEIS Comments](#);  
**CC:** [jon@dubman.com](mailto:jon@dubman.com); [Rob Wilkinson](#);  
**Subject:** BetterBridge org SR 520 public comment.doc  
**Date:** Wednesday, November 01, 2006 12:00:40 AM  
**Attachments:** [BetterBridge org SR 520 public comment.doc](#)

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Caught some typos. Please use this version. Thank you.

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



October 31, 2006

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C-032-001

BetterBridge.org is a 501c(4) organization formed to play a constructive advocacy role on the SR 520 Bridge Replacement & HOV Project. We are proud to have suggested concepts that eventually led to WSDOT's official Pacific Street Interchange for SR 520. We at BetterBridge.org strongly support the 6-lane Pacific Street Interchange option for SR 520, and oppose all other DEIS options.

#### Origin of BetterBridge.org

BetterBridge.org was co-founded by Rob Wilkinson and Jonathan Dubman, who suggested a daring new approach for SR 520 via an Opinion piece in the Seattle Times in February of 2005. These concepts were quickly met with interest and enthusiasm in the Montlake community, among elected officials and countless other interested parties with whom we have met. Some 162 individuals and groups have donated money to fund BetterBridge.org, and many have volunteered in various capacities.

C-032-002

#### Appreciation for the SR 520 project team

Throughout this process, we have been absolutely delighted that WSDOT has been willing to listen, and has given all the citizen-generated ideas, ours included, serious and fair consideration. We have come to understand that the SR 520 project team is led by and comprised of exemplary public servants who deserve enormous credit for their hard work, dedication, flexibility and objectivity. The project has clearly gone to enormous efforts to do public outreach, to provide concerned citizens, jurisdictions, agencies, etc. with clear, accurate, relevant and timely

C-032-002 | information in an objective manner, and to listen to and respond to everyone's concerns. This track record bodes very well for the hard work ahead as we move towards an FEIS, a Record of Decision, years of construction and many decades of operation of a new SR 520 facility.

We want to take this opportunity to make a special remark on the record concerning the outstanding legacy of the late Maureen Sullivan, at one time the head of both the SR 520 and the Alaskan Way Viaduct projects, whose skillful leadership helped guide the SR 520 project through challenging times. She combined professionalism with warmth, openness and a willingness to listen, and has left a legacy in our hearts as well as on this project.

#### Pacific Street Interchange is the only solution to averting stalemate on SR 520

Prior to the addition of the Pacific Street Interchange option, it appeared to us that we were headed for a stalemate on SR 520 that would serve nobody's interests. There were adamant supporters of a 4 lane floating bridge, an 8 lane floating bridge. It was our perception that neither of these would be politically viable regionally, and neither would meet our transportation needs. The latter is borne out by the facts of the analysis in this DEIS. On March 1, 2005, a meeting (organized by a large coalition of neighborhood organizations, BetterBridge.org not included) was held at the Museum of History and Industry to send a clear message that none of the alternatives on the table at that time was acceptable. The meeting had about 350 attendees including SDOT, the office of the Mayor of Seattle, and every member of the Seattle City Council, or a representative thereof. Essentially, the project was perceived as having unacceptable impacts and insufficient transportation benefit.

C-032-003 | Major advantages of Pacific Street Interchange

Pacific Street Interchange is the only option that creates a direct, fast and reliable connection between SR 520 bus service and light rail.

Pacific Street Interchange is the only option that restores a continuous greenbelt linking Portage Bay with Union Bay and the Arboretum.

Pacific Street Interchange is the only option that fixes the Montlake Bridge bottleneck, saving over 20 minutes for trips from 45<sup>th</sup> St. to SR 520 in the PM peak period.

Pacific Street Interchange adds HOV lanes for the length of the corridor without necessitating an 8 or 9 lane Portage Bay Viaduct.

When no alternative is specified in the comments below, the comments should be interpreted as referring to the Pacific Street Interchange option.

C-032-004 | On our original suggestion of a high-level suspension or cable-stayed bridge

We originally suggested a pair of high level suspension or cable-stayed bridges, with a Pacific Street Interchange. Suspension and cable-stayed bridges were screened out due to issues including noise, constructibility, cost, environmental impacts. Although a high level bridge was thought to be possible, from discussions with WSDOT, we arrived at the belief that a new facility closer to the current profile would be preferable in terms of visual impacts. The WSDOT team was very helpful in providing sufficient information, including renderings, to reach this conclusion.

C-032-005

#### Bus-rail transfer at the UW transit hub

Because the University of Washington is a critical transit destination, Sound Transit plans a light rail station in the vicinity of Montlake Blvd. / Pacific St. intersection. From this station, Sound Transit anticipates running trains as frequently as every 2.5 minutes. It will be a 6 minute train ride from UW to Westlake, 3 minutes from UW to Capitol Hill, and 7 minutes to Northgate. Via bus rapid transit, it will be about a 12 minute ride to Overlake / Microsoft from UW.

Because of the siting of a light rail station in this vicinity, the UW becomes the natural location for a transit hub that connects light rail, local and regional buses. This area, the vicinity of what is today, Triangle Parking Garage, has a lot of geometric and functional constraints, and cries out for an integrated plan. We strongly advocate that this plan be optimized for transfer between buses and light rail, to minimize the number of steps and maximize the comfort and convenience for transit patrons. This entire interchange requires a comprehensive plan that will consider the joint use of WSDOT right of way and UW property to create a pedestrian-friendly transit hub that serves both transient and local pedestrian movement in an attractive, quiet and safe manner. Grade separation, inclement weather protection, moving walkways and the needs of bicyclists should all be considered.

C-032-006

#### Montlake lid

The lid in Montlake should extend from Montlake Blvd. all the way east to the 24<sup>th</sup> Ave. overcrossing, with an opening for ventilation if absolutely necessary. If possible, a sidewalk and room for landscaping should be cantilevered to the north of Lake Washington Blvd., east of 24<sup>th</sup> Ave. E, linking this park to the part of the Arboretum south of SR 520 and helping to respect and restore the Olmsted legacy of Lake Washington Blvd.

C-032-007

#### Montlake Blvd. treatment

The outer lanes of Montlake Blvd. that currently serve on- and off-ramps for SR 520, should be striped as bicycle lanes, possibly shared with local transit if that is seen to be helpful. The "boulevard treatment" of Montlake Blvd. as envisioned by the Olmsted Brothers should extend further south across the SR 520 right of way all the way to Roanoke St.

The sidewalks along Montlake Blvd. south of the Montlake Bridge are in unsafe condition and should be repaved and brought up to current accessibility standards.

#### West Montlake Place E realignment

For the FEIS, please evaluate restoring the alignment of West Montlake Place E to roughly match what it was prior to SR 520 construction, while reconfiguring E Roanoke St. to be a quiet neighborhood street with planting strips, like E Louisa St., E Miller St., etc. It is important to maintain a signalized pedestrian crossing south of Lake Washington Blvd. E and north of E McGraw St. on the arterial that is variously referred to as 24<sup>th</sup> Ave E and East Montlake Place E.

C-032-008

### Mitigation for 24<sup>th</sup> Ave. E

Traffic speeds and volumes are of great concern on 24<sup>th</sup> Ave. E in the Montlake community. This community is trying to nurture a small business district, a block away from an elementary school, that is also home to a new branch of the Seattle Public Library system. Law enforcement officers have clocked numerous drivers traveling at over 60 mph through this area. Automated speed enforcement should be provided as a form of mitigation for the increased traffic volumes that are anticipated on this arterial as a result of this project.

C-032-009

### Arboretum mitigation

We believe this project should transfer ownership of the "WSDOT peninsula" to the Arboretum, and fund the Arboretum Master Plan as partial mitigation for the disruption and loss of property that the construction will cause.

We support a toll surcharge at the Lake Washington Blvd. ramps to help generate funds and to prevent an increase, and potentially decrease, the traffic volume in the Arboretum.

C-032-010

### Foster Island Loop Trail

The Foster Island Loop Trail should be brought up to current environmental standards, if possible, and should be designed such that it is above the water level of Lake Washington year round as an interpretive trail system for educational and recreational use. This trail should tie into the treatment ponds at the current MOHAI site. The exemplary water treatment facility in Renton and associated public art should be seen by all who participate in the design for water treatment facilities on SR 520.

C-032-011

### Trail link to Madison Park

BetterBridge.org strongly endorses a bicycle/pedestrian trail link to Madison Park. This connection probably makes more sense at 43<sup>rd</sup> Ave. E than at 37<sup>th</sup> Ave. E due to wetland impacts at 37<sup>th</sup>. There are navigation issues and concerns over trailhead parking. Leaders and members of the bicycle community with whom we have met have been enthusiastic about this connection, which would provide a much shorter route from the east part of Seattle to the Eastside and also to UW. The Arboretum Master Plan includes a recreational trail but does not include a commuter trail through the Arboretum, and Lake Washington Blvd. a narrow, winding roadway with high traffic volumes and poor nighttime lighting, is not bicycle-friendly, so this connection from Madison Park would provide a vital link in our region's bicycle network.

We are a bit puzzled at opposition to this idea from some residents of Broadmoor who live nowhere near 43<sup>rd</sup> Ave., as there would be no access to this trail to the Broadmoor community, nor would the trail be visible from that community.

C-032-012

### Other bicycle/pedestrian trail opportunities and issues

The SR 520 project is to be commended for its inclusion of a full 14-foot trail across Lake Washington. Every effort should be made to provide connectivity to other routes and trails on both sides of the lake. BetterBridge.org advocates extending the SR 520 bicycle trail west to Montlake Blvd. to connect with the proposed freeway lid park in Montlake, and from there down to the popular Montlake Playfield and connecting routes to Interlaken Park, Eastlake and other Seattle destinations. This should be constructed in addition to, but not in place of, a bicycle trail on the Union Bay Bridge to UW. We expect the SR 520 bicycle trail to be much more popular than the I-

C-032-012 | 90 bicycle trail, given the proximity of the Burke-Gilman trail and UW to residential districts and employment centers on the Eastside. If a connection is made on only one side of the ship canal, many bicyclists will be forced onto the narrow shoulders of the Montlake drawbridge, which will be shared with high pedestrian volumes. Additionally, extending the SR 520 bicycle trail west to Montlake would activate the park on the lid, and save about half a mile for bicycle commuters coming from or going to south of the ship canal.

With its location at the UW and its proximity to the Burke-Gilman trail, a local bicycle route across the Montlake Bridge and SR 520 bicycle trail access, the UW transportation hub at Montlake/Pacific will be a major bicycle hub as well as a transit hub. It is a natural spot for a bicycle station incorporating secure bicycle storage, rental and other services, kiosks with maps and other bicycle-related information. There are some excellent examples of this such as the facility at Millennium Park in Chicago.

A trail on the Portage Bay Bridge would have an extended, steep grade and would add significant cost and environmental impacts and need not be pursued.

C-032-013 | Mitigation opportunity: South Portage Bay Park / Montlake Playfield

With a matching neighborhood grant and participation from Seattle Parks Dept., FABNIA (Fuhrman and Boyer Neighborhood Improvement Association) has been evaluating opportunities to improve South Portage Bay Park and the Montlake Playfield with shoreline mitigation, a waterfront trail, a put-in for hand-carried boats, etc. This plan ought to be funded as mitigation for the major construction and view impacts that the rebuild of the Portage Bay Bridge will imply.

C-032-014 | Waterfront trail on NOAA property

It was once possible to walk along the shoreline of Portage Bay from the Seattle Yacht Club to the Bill Dawson trail which passes under SR 520 and connects to the Montlake Playfield. Since a near-waterfront trail is envisioned all the way west to Everett St., and there is an existing waterfront trail all the way from the Seattle Yacht Club to Foster Island, the NOAA property represents a "missing link" in what could be an approximately 1.5 mile waterfront to waterfront trail from Portage Bay to Union Bay and the Arboretum. This trail opportunity should be pursued as part of this project.

C-032-015 | Alignment of Montlake Blvd. widening north of Pacific Place.

The green wooded buffer alongside the Burke-Gilman trail is an important asset for the University of Washington campus, for trail users, and even for all those who travel along Montlake Blvd. between 45<sup>th</sup> St. and Pacific Place. Please choose an alignment for the widening of Montlake Blvd. that preserves to the greatest possible extent this wooded buffer. This would require the displacement of additional surface parking spaces on the UW campus. These parking spaces can readily be replaced through structured parking.

C-032-016 | Pedestrian crossings of Montlake Blvd. on the UW campus

There are several pedestrian crossings of Montlake Blvd. connecting the central UW campus to the east campus, athletic facilities and parking lots. These pedestrian crossings would have to be reconstructed as part of this project if Montlake Blvd. is widened. None currently meets ADA standards. These bridges would be viewed by at least 60,000 people per day passing over or underneath and should be held to a high standard of design. They should be wider, and of course, accessible, with adequate clearance. We have heard concerns that the widening of

C-032-016 | Montlake Blvd. would further divide these parts of campus. We believe that exemplary pedestrian bridges in this area would actually serve to unite the campus.

C-032-017 | Potential early action: Early widening of Montlake Blvd. with HOV lanes

With Pacific Interchange, Montlake Blvd. is widened from Pacific St. to the vicinity of 45th St. One idea that was suggested before Pacific Interchange was conceived (e.g., the City of Seattle's University Area Transportation Study) is a southbound HOV lane on Montlake Blvd., to reduce person-hours of delay on the approach to the Montlake Bridge. While this is not a solution for the whole problem, it could help achieve tangible benefits quickly, years before the completion of the SR 520 project. We would like to see the early action of adding HOV lanes north and southbound on Montlake Blvd. (to be converted eventually to GP lanes) evaluated as a form of construction mitigation. For the FEIS, provided Pacific Street Interchange is chosen as a preferred alternative, please forecast and document the reduction in daily person-hours of delay that could be achieved by the addition of HOV lanes on Montlake Blvd. (on the inside or outside lanes, as appropriate) prior to completion of the Union Bay Bridge, please assess potential transit service that could serve as construction mitigation, and please assess what would be required to accelerate construction of this arterial widening.

C-032-018 | Potential early action: Accelerate initiation of tolls on SR 520

The SR 520 project will include tolls. The Project's traffic analysis shows that these tolls have significant traffic benefits in the corridor. With legislative action and support from WSDOT and the region, these could be instituted earlier rather than later, making better use of today's SR 520 bridge, while accelerating funding for project mitigation. BetterBridge.org has suggested this in numerous public forums and found great enthusiasm for this concept. We believe the privacy issues are important, but solvable. It is vital for Washington State to have a single, reliable, low-maintenance and highly secure transponder system that is flexible enough for us to migrate to regional tolling, which is probably where we are headed. For the FEIS, please evaluate the financial and traffic implications of initiating tolls as early as possible, either regionally or on SR 520 alone if procedural issues preclude looking at the region as a whole as part of this study. This could be done in the context of any corridor development authority, public/private partnership, or other innovative approach that is eventually decided upon for designing, building, operating and maintaining the corridor.

C-032-019 | Congestion or value-pricing in the GP lanes

With the 6 lane alternatives, considerable congestion is forecast in this DEIS for the GP lanes on SR 520, particularly westbound in the morning, albeit far less than with the 4 lane alternative or No Build. While this congestion may provide an incentive for time shift, mode shift or other behavioral adaptations, it represents an economic and environmental cost that every effort should be made to avoid. For the FEIS, please attempt to determine a regional tolling policy that would implement "congestion pricing" or "value pricing" on SR 520. Please give careful consideration to what it might take to eliminate, if possible, or reduce to the maximum possible extent, congestion on the GP lanes of SR 520. Since the noise analysis already assumes posted speeds at maximum traffic volume, that should not need to be reevaluated.

C-032-020 | Width of shoulders and GP lanes in Seattle

Some are advocating for narrower shoulders and GP lanes in environmentally sensitive areas in Seattle. While we agree with the intent of this narrowing, a balanced view would consider the implications for safety and reliability. Balancing these factors will present a challenge, but it

C-032-020 | should not be assumed that narrower is necessarily better. For the FEIS, please quantify the anticipated impact to safety and reliability for narrowed shoulders and travel lanes at various widths, so the environmental impacts can be balanced against transportation impacts and public safety.

C-032-021 | 4 lanes across the lake fails to accommodate transit and lacks political support  
The 4-lane option as proposed by the Project does not provide transit speed and reliability that is necessary to provide a viable transit alternative in this corridor. Buses are stuck in congestion that is projected to increase dramatically across Lake Washington, failing to meet the purpose and need of the Project.

Local transit: The Montlake mess impacts speed and reliability for some of the most productive Metro bus routes including routes 43 and 48. Unless the Montlake bottleneck is relieved, speed and reliability for local transit will continue to decline over time.

Traffic: The 4-lane option fails spectacularly for local traffic in the Montlake area, as well as for traffic on the mainline of SR 520.

Neighborhood and park impacts: The footprint of the 4 lane configuration is not only larger through Seattle than the current SR 520, but much larger, in fact, through the heart of Montlake than the footprint of Pacific Interchange. With 4 lanes, any Montlake lid (not included in DEIS) would fail to reconnect the neighborhood due to access ramps getting in the way. 4 lanes does not provide the continuous park and trail system provided by Pacific Interchange. The Montlake interchange is expanded, and overall, things are made worse for pedestrians, bicyclists, transit and local traffic. It should be noted that WSDOT's "4 lane" project has a 5 lane Portage Bay Bridge, which is almost as wide as the 6 lane Portage Bay Bridge associated with Pacific Interchange.

4 lanes may be the cheapest solution with the least Arboretum impact, but it has fatal flaws, particularly for transit.

C-032-022 | 8 lanes across the lake has multiple fatal flaws  
Any configuration across Lake Washington that has more than 4 general purpose lanes is a recipe for both political gridlock and traffic gridlock. Any configuration that would add a significant amount of traffic to I-5 would essentially be predicated on widening I-5 at least as far as Fort Lewis. Expanding I-5 is neither affordable nor consistent with numerous City of Seattle policies. An 8 lane option would cause massive congestion on our arterial streets, degrading local transit performance.

Any 8 lane configuration would clearly have profound negative impacts to neighborhoods, parks and the environment.

In summary, 8 lanes across the lake would be unaffordable, unacceptable, and counterproductive to the purpose of this project.

C-032-023 | The Base 6 alternative, with 9 lanes across Portage Bay, fails on mobility and livability

The Base 6 alternative retains the Montlake interchange and the bus stop in Montlake. As developed by WSDOT, the Portage Bay Bridge must be 9 lanes due to the need for transit acceleration/deceleration and auxiliary (weaving) lanes.

C-032-023 Regional transit: The Base 6 lane alternative fails to make a fast and reliable transit connection to light rail. A 4-lane historic drawbridge forms the only connection between SR 520 and all of Northeast Seattle, including the University of Washington, the city's largest employer, and the most important light rail stop north of Westlake. Pedestrian and bicycle access to the Montlake bus stop would be very poor due to enormous congestion in the Montlake area. The Montlake bus stop would continue to separate UW and downtown-bound buses on an upper and lower level, causing confusion.

Local transit: The Base 6 alternative depends on the already over-capacity Montlake Bridge. This would imply a steady reduction in speed and reliability for some of the most productive bus routes in the region.

Neighborhood and park impacts: The physical footprint of the Base 6 alternative through Montlake and across Portage Bay is profound, prompting residents to nickname the interchange the "Montlake Monster." The total acreage of parks impacts are about par with Pacific Interchange, but the Base 6 lane option covers more parkland at ground level and has far inferior mitigation opportunities. Unlike the area underneath relatively high spans in the vicinity of Foster and Marsh Island with Pacific Interchange, parkland covered at ground level would be unusable.

C-032-024

#### The Second Bascule Bridge option fails on mobility and livability

The Second Bascule Bridge option (parallel Montlake drawbridge) is even worse than Base 6 in almost every regard, which explains why it has vanishingly little support. It was introduced as a potential alternate approach to reduce the footprint and increase transit connectivity, but it does not deliver on these aims.

Regional transit: The Second Bascule Bridge fails to make a fast and reliable transit connection for SR 520 buses to the UW. It is particularly unreliable in off-peak times when the drawbridge goes up, but buses are generally stuck in tremendous congestion on Montlake Blvd. The SR 520 afternoon peak hours on which the restriction on bridge opening hours is based are not aligned with the UW schedule, which has peak travel demand earlier in the afternoon, so "off peak" transit reliability is a problem for access to the UW.

Local transit: Local and regional transit both share the extremely congested Montlake Blvd., and would be equally slow and unreliable with this option.

Traffic: In some ways, congestion is actually worse with this option than without a second drawbridge. By and large it is the same bad story as the Base 6 lane alternative; there are other bottlenecks in the vicinity besides the bridge itself that are not and cannot be addressed by this plan.

Neighborhood and park impacts: The Second Bascule Bridge causes irreparable harm to the Montlake neighborhood, its Olmsted legacy (which includes Montlake Blvd.) and other historic resources, and has impacts to the UW campus without attendant benefits.

C-032-025

#### Roanoke Park lid

BetterBridge.org supports the configuration for the Roanoke lid proposed by the SR 520 Local Impact Committee (LIC), including the concept of a bicycle trail link from 10<sup>th</sup> to Broadway Ave E. on the south side of SR 520 right of way.

C-032-026

Microsoft/Overlake transit access

Although it is outside the geographic scope of this project, the Overlake transit station serving Microsoft and other nearby employers is very important to many users of this corridor. Today, westbound Sound Transit Regional Express buses are forced to make a 6 to 7 minute diversion to serve the transit station. Microsoft plans to add approximately 12,000 employees in Redmond and the overall employment of Redmond is projected to grow from approximately 80,000 today to over 100,000 within the planning horizon of this project. Something needs to be done to optimize bus service to Overlake, perhaps either with an in-line transit stop or direct access ramps serving the Overlake transit station.

C-032-027

Height and Design of Union Bay Bridge

The navigational clearance of the Union Bay Bridge should be lowered from 110 feet to 70 feet. This would reduce noise and visual impacts, improve traffic operations, improve the operation of buses full of passengers, and provide an easier grade for bicyclists. BetterBridge.org encourages the Project to analyze a Union Bay Bridge with 70 foot clearance in the FEIS and to work with the Coast Guard to permit this.

All parts of this corridor should be given careful design consideration, but the Union Bay Bridge will be a new Seattle landmark and deserves the highest standard of aesthetic design. Private funding should be sought to supplement public funding in order to achieve the highest possible aesthetic standard for this bridge.

C-032-028

Noise walls and quiet pavement

Given the proximity of this highway to parks and historic neighborhoods, and the limitations of noise walls given the topography in the corridor, and the visual impacts of noise walls, we strongly encourage the Project to research and pursue quiet pavement technology in this corridor, even if it is more expensive to construct and/or maintain.

C-032-029

Noise walls should be designed to strongly discourage graffiti, and to make it easy to remove graffiti should it occur. We are intrigued by the possibility of translucent and/or curved noise walls and encourage the Project to research these and examine costs and impacts thereof.

C-032-030

Construction Impacts

We are concerned over the potentially 5 year closure of the Lake Washington Blvd. access ramps. Even if a way is found to reduce the closure period, this seems likely to have a profoundly negative impact on traffic congestion at the Montlake Interchange. We encourage the Project to come up with a plan to make the best of this unavoidable situation. Early tolling could be part of this plan.

Thank you for your careful attention to this important matter.

Jonathan Dubman and Rob Wilkinson, on behalf of the Directors and Board Members of BetterBridge.org:

Kate Battuello

Mabry DeBuys

Jonathan Dubman

Bob Mahon

Robert Rosencrantz

Ken Schubert, III

Peter Stoner

Rob Wilkinson

Millennium Park Bike Storage and Locker Facility, Chicago Illinois.  
(Photo courtesy Art on File, Inc.)



**From:** [David Hiller](#)  
**To:** [SR 520 DEIS Comments;](#)  
**CC:**  
**Subject:** WSDOT SR 520 Project  
**Date:** Tuesday, October 31, 2006 6:04:25 PM  
**Attachments:**

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Paul Kruger  
Environmental Manager  
WSDOT SR 520 Project  
Via e-mail at: [sr520deiscomments@wsdot.wa.gov](mailto:sr520deiscomments@wsdot.wa.gov)

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

We offer these numbered comments for the record on the subject DEIS,  
published July 2006.

C-033-001

The project's main bridge pedestrian-bike facility should be carried west across Portage Bay to extend to a western terminus at Roanoke Ave vicinity 10th Ave E.

C-033-002

The new cross-lake bike/ped facility should be connected both south of SR520 to Madison Park, and east to the existing SR-520 trail. This will allow nonmotorized travel between north and south Seattle and allowing much better connections across the lake to major employment, retail and residential centers. The 43rd and 37th Ave. routes for this bike-ped connection must both continue to be studied in the final EIS, and other routes should also be explored.

C-033-003

We recommend the adoption of an alternative to the Pacific Interchange that would be HOV and transit only - reducing its footprint, impacts and cost. Further, we recommend the closure of the Montlake on and off ramps, thereby reducing the footprint of the Portage Bay bridge significantly and discouraging short to medium distance SOV trips.

C-033-003

With our recommendation of a modified transit, HOV only Pacific Interchange, bicycle flow through the Pacific/Montlake intersection should also be provided with grade separation along with the proposed grade separation for the pedestrian crossings for this location. (Exhibit ES-12a, Part B). This is needed to more efficiently and safely serve the major demands for bicycle movement originating both on the Eastside and south of Montlake and the Arboretum along Lake Washington Blvd – to and from the U.W campus and points north of the campus as well as the Burke-Gilman Trail corridor.

C-033-004

The north side option for the project's bike/ped trail should be adopted for the Eastside project segment, thus eliminating two sharp cross-overs in the trail to/from the south-side alignment alternative (at the Medina shore area and vicinity 96th Ave NE.) thereby improving the ease and clarity of use and signing for cross-lake bicycle traffic. This bicycle demand is expected to grow considerably when the project is completed owing to the current capacity constraint and inconvenience associated with the bike-on-transit bus service.

C-033-005

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

C-033-006

WSDOT should provide supplemental information on the 4-lane alternative that includes the provision of transit and HOV lanes on local arterials, a corridor design that maximizes transit use, and the effects of new regional transit and light rail investments.

For study purposes, HOV and transit lanes should be immediately converted from general purpose lanes on the existing bridge; the draft EIS fails to study converting any of the existing four lanes to HOV or transit-only, whether at rush-hour or around the clock. WSDOT should consider peak-period SOV bans on a proposed 4-lane reconstruction to improve transit service on a lower-cost alternative.

C-033-007

The 520 replacement should be built to accommodate future high capacity

C-033-007 | transit: Pontoons should be constructed to accommodate possible future light rail connections. Height/grade of the 520 facility should accommodate possible future light rail connections. The 520 facility should be built to accommodate possible future light rail into the proposed four or six lane footprint

C-033-008 | A 520 Corridor Transportation Demand Management Agreement should be developed with the adjacent 520 cities and major employers to work together to decrease SOV use in the corridor. A four-lane option with congestion-pricing should be studied.

WSDOT should provide supplemental information on another 4-lane option that includes a “congestion-pricing” toll that ensures free flow at rush hour for a four-lane option, to provide incentives to reduce SOV use and increase the use Transit/HOVs. We urge studying tolling on the I-90 bridge to reduce diversion of SR 520 users to another close-by Cross-Lake facility as well as the effect of system-wide tolling on 520 Bridge throughput.

C-033-009 | We propose the plans be subjected to a Health Impact Assessment. Health impact assessment (HIA) is commonly defined as “a combination of procedures, methods, and tools by which a policy, program, or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population”

C-033-010 | Lid options should be studied and presented to the community for all alternatives.

C-033-011 | WSDOT should select the alternative that most supports good land-use: The SR520 Bridge replacement project is an excellent opportunity to meet the goals of the Growth Management Act, and selection of the preferred alternative should consider potential impacts and benefits to land use and future development.

C-033-012 | Reductions in global warming emissions: Climate change is no longer the subject of debate: rather, it is our most urgent environmental and social challenge. In our region, transportation is the single greatest source of global

C-033-012 | warming emissions. Supplemental information should be provided to show how we can achieve a net reduction in global warming emissions for each alternative over a 2006 baseline.

C-033-013 | The footprint of each of the six-lane options should be reduced. Options should be looked at to drastically limit the existing footprint including:

\* Two-lane, bus and HOV-only Pacific interchange. We acknowledge that this severely limits SOV access to the UW but the environmental and aesthetic benefits outweigh this concern. This supports UW's neighborhood commitment to grow without increasing SOV trips.

\* Reducing shoulder widths and lane widths. WSDOT should consider reducing design speed and vehicle speed on the bridge to ensure safety on narrower lanes as well as maximizing throughput.

\* As mentioned in the above mobility section, possible future light rail should be accommodated in the proposed four-lane or six-lane footprint.

C-033-014 | The region should contribute significantly to financing the 520 project through the Regional Transportation Investment District within its current taxing authority.

C-033-015 | Tolls, specifically congestion pricing, should be imposed now to start generating revenue for the project. The EIS fails to consider a rush-hour toll level that would keep the four-lane alternative free-flowing at rush hour. Tolling should extend to I-90 at equal levels to discourage SOV commuting.

Thank you for your time and attention to our comments,

David Hiller  
Advocacy Director

"Creating a Better Community Through Bicycling"

Cascade Bicycle Club  
PO Box 15165

7400 Sand Point Way NE  
Seattle, WA 98115  
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**From:** [Chris Leman](#)  
**To:** [SR 520 DEIS Comments;](#)  
**CC:**  
**Subject:** Eastlake Community Council comments on the draft SR520 EIS  
**Date:** Tuesday, October 31, 2006 11:39:47 PM  
**Attachments:**

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Dear Mr. Krueger:

c-034-001 | In addition to our previous comments, the Eastlake Community Council offers the following regarding the SR520 draft EIS. The EIS has made a serious error in largely omitting analysis of the impacts of SR520 expansion on Seattle's Eastlake neighborhood. Eastlake's SR520-related impacts from noise, impairment of the landmark Seward School, air pollution, long-term traffic, and construction traffic are all virtually ignored.

The Eastlake neighborhood is located along the west edge of I-5 and is centered on the portion of I-5 that gives and receives SR520 traffic via various ramps, including flyover ramps which are as little as 100 feet from our streets and buildings, and which currently broadcast noise, vibration, dust, and air pollution into our neighborhood--all impacts that will increase as these ramps are expanded in the various alternatives.

The Eastlake neighborhood is one of the state's densest neighborhoods, and it also has the state's best balance of jobs and residents, with equal numbers of each. Since its founding in 1971, the Eastlake Community Council has closely followed discussions about SR520, and has had representatives on a series of governmental committees that have examined the SR520 project. This neighborhood deserves more equitable treatment from the EIS, which largely ignores its SR520 impacts.

c-034-002 | The entire technical report on noise is seriously deficient in failing to address noise impacts on the Eastlake neighborhood. In important instances, noise analysis areas were not included in the Eastlake neighborhood, and they should be. SR520 expansion will cause increases in noise in this neighborhood, but these impacts are not modeled or even mentioned.

c-034-003 | Emblematic of this neighborhood's neglect in the EIS is that the "valuable historic

C-034-003 | resources" listed entirely ignore Seward School, the City's oldest continuously operated school, and which is on the National Register of Historic Places, and also has been designated as a Seattle landmark under the City's landmarks ordinance. Seward School is located very close to SR520 traffic that emerges from the flyover ramps that move traffic between SR520 and I-5. Seward School already has serious visual, noise, vibration, and pollution impacts from SR520 that would be worsened by all of the proposed alternatives, but less so by the four-lane alternative.

C-034-004 | The EIS analysis of construction traffic impacts is also particularly neglectful of impacts on the Eastlake neighborhood. Boylston Avenue East, Lynn Street, and Eastlake Avenue are already severely hurt by southbound traffic on its way to the I-5 on-ramp at Newton. It seems likely that a large proportion of the southbound truck traffic will access I-5 at this ramp. The EIS fails to provide any serious data or analysis regarding the magnitude of this truck traffic and its impacts on streets, residences, and businesses that already face unacceptable impacts. These impacts bear particularly on the choice between the four and six lane alternatives, but the EIS fails to provide any quantitative data or analysis of their meaning for our neighborhood

C-034-005 | We urge that the EIS data and analysis be redone, if necessary via a supplemental EIS, so that the Eastlake neighborhood's impacts from SR520 expansion are fairly and fully assessed.

Sincerely,

Chris Leman, Secretary  
Eastlake Community Council  
117 E. Louisa St. #1  
Seattle, WA 98102  
(206) 322-5463

**From:** [Steve Broback](#)  
**To:** [SR520DEIScomments@wsdot.wa.gov](mailto:SR520DEIScomments@wsdot.wa.gov);  
**CC:**  
**Subject:** ECRD SR-520 Draft EIS Comments  
**Date:** Tuesday, October 31, 2006 4:29:51 PM  
**Attachments:**

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ECRD, an eastside Lake Washington Citizen's Group concerned with maintaining and enhancing the livability of our neighborhoods. Our members represent neighborhoods ranging from South Bellevue to Woodinville. We have attended several SR-520 public meetings and has reviewed the draft EIS for the SR-520 bridge replacement and HOV project. We offer the following comments.

c-035-001 | ECRD strongly supports the four lane rebuild alternative. It improves safety, provides improvements to the environment, e.g. storm water runoff treatment, and is affordable. We strongly oppose the massive six lane Pacific Street interchange alternative. It would cause widespread environmental devastation to Lake Washington, arboretum, wetlands, neighborhoods, and protected species habitats. It would also cost an exorbitant 4.38 billion dollars, twice the estimated cost of the four lane rebuild.

c-035-002 | We have reviewed the OTAK 10/17/06 tech memo to the University of Washington which asserts, "Several important analyses of environmental effects are either not performed, performed using questionable assumptions or inappropriate analysis." This report raises serious concerns about the validity of the WSDOT SR-520 DEIS supporting documents.

c-035-003 | We also believe that the WSDOT must seriously study the "tube tunnel" concept, which is not now included in the SR-520 alternatives.

c-035-004 | Traffic congestion relief claims, especially for the six lane alternative, are not believable. The assumptions regarding the significant numbers of drivers who will leave their cars in favor of transit are unrealistically optimistic.

c-035-005 | We believe the WSDOT must include the cost of quiet pavement deployment in

c-035-005 | all alternatives that affect neighborhoods. State legislators have indicated they want to see this type of noise mitigation put in place to alleviate neighborhood noise concerns.

c-035-006 | Seismic hazards are not well-defined. The OTAK report, concludes "there is no thorough analysis of potential risks associated with geologic hazards, such as earthquakes, and how they would influence the proposed roadway in its various potential forms." We are concerned that no reference is made in the DEIS to the 2005 Cascadia region earthquake work group report.

c-035-007 | Throughout this process, we have been disappointed that no scenario for rebuilding of the current bridge structure has been included. The inclusion of a "do nothing" alternative while ignoring a "rebuild existing structure" alternative seems disingenuous to us. Noted highway engineers have assured us that floating in a new span and replacing the hollow-core pilings is a reasonable, phasable, and inexpensive alternative.

c-035-008 | Total financing required to fund all alternatives are not adequately discussed. Considering that major personal privacy concerns exist with electronic bill collection, the assumption that tolls will be embraced is not realistic.

c-035-010 | The WSDOT has proposed stormwater treatment facilities/cells to replace wetlands. We understand these cells are an experimental design that may not have been proven to effectively treat polluted stormwater run-off. In addition, these cells (even if effective) are no panacea. To quote OTAK once more: "some pollutant levels under the proposed alternatives will actually be higher than the levels monitored in today's runoff."

c-035-011 | We believe WSDOT should study/adopt the contents/approach of the SR-520 project corridor and status handbook dated 08/30/06, which emphasizes neighborhoods and context sensitive solutions (CSS) for the project design. WSDOT should proceed with LEED principles for application to the SR-520 project.

Thank you for your consideration,

Steve Broback  
ECRD



**From:** [Jim Horn](#)  
**To:** [SR 520 DEIS Comments](#);  
**CC:**  
**Subject:** Comments on the SR 520 Bridge Replacement DEIS  
**Date:** Tuesday, October 31, 2006 3:59:50 PM  
**Attachments:** [Krueger ltr re SR-520 DEIS.pdf](#)

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Mr. Krueger;

c-036-001

Please accept our comments from the Eastside Transportation Association on the subject DEIS documents. Our members are very concerned that the DEIS evaluate all feasible solutions to our cross-lake transportation problems and not exclude, for political reasons, options that offer congestion relief, more throughput, and reduced tolls.

Sincerely,



**Jim Horn**  
**Chairman**  
**Eastside Transportation Association**

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# Eastside Transportation Association

*"Dedicated to improving our quality of life and environment by reducing congestion through increased mobility"*

P.O. Box 50621  
Bellevue, WA 98015

October 31, 2006

Paul Krueger  
Environmental Manager

Re: Comments on the SR-520 Bridge Replacement DEIS

Dear Mr Krueger:

The WSDOT SR-520 Bridge Replacement Draft EIS summarizes results of the 8 years of the corridor planning process thus far. Page ES1-2 states that: *"The ... Project is one of the region's highest transportation priorities. Transportation congestion needs to be addressed and traffic safety and reliability improved."* Unfortunately *congestion relief* was a critical element that has been largely ignored.

During the PM peak period, the "Montlake Mess" has traffic backed up from the SR-520 eastbound on-ramp to as far back as Sand Point Way, and from the Lake Washington Blvd eastbound on-ramp halfway back through the Arboretum. Westbound backups on the Eastside typically extend to Bellevue Way and often all the way to I-405 and beyond. The DEIS does not describe these intolerable existing traffic congestion conditions, nor do its alternatives address any congestion relief for these existing conditions.

The only action proposed for non-HOV congestion relief will be the imposition of tolls in the hopes that tolls will drive some of the excess non-HOV and commercial/ freight vehicle traffic away from the corridor. The 6-lane alternative that adds a transit/HOV lane in each direction would provide minimal relief for non-HOV drivers (one and two-occupant vehicles) and commercial freight traffic using the corridor whose diverse travel patterns do not have reasonable transit or higher-occupancy HOV options.

## **The Bridge Bottleneck**

The totally unaddressed issue for the SR-520 corridor is that over one-third of the trans-lake bridge traffic enters and exits mid-corridor between Montlake and Bellevue Way – and that occurs even though those ramps are heavily metered during peak periods. That means that a proper balance for corridor traffic demand would require an additional GP traffic lane each way between Montlake and Bellevue Way. With an added eastbound GP lane east of Montlake, the Montlake and Lake Washington Blvd ramp meters could be greatly relaxed or even eliminated.

Not only would that relieve the Montlake Mess and Arboretum backups, but it would shift even more eastbound traffic between northeast Seattle and the Eastside from I-5 to the preferred local access routes via Montlake. This shift is even better accommodated by the new "Pacific Interchange" subalternative with a new crossing of Portage Bay to relieve the Montlake Bridge – an option that we believe is supported by the Montlake Community.



C-036-004

### “What happened to the 8-Lane Alternative?”

The WSDOT project team studied the 8-lane alternative. Its models found that when the bridge bottleneck was relieved by the addition of two GP lanes on the bridge, bridge traffic to/from I-5 was reduced – not increased. Up to 45% of the bridge traffic to and from Seattle have origins and destinations east of I-5. The percentage of bridge traffic to/from Montlake Blvd increased from 25% to 35%, and bridge traffic to and from I-5 decreased to 55%.

However, the reduction of bridge traffic on I-5 and the Portage Bay Viaduct allowed the model to more than offset the bridge traffic reductions with even greater traffic increases from northeast Seattle. Traffic accessing I-5 at its NE 45<sup>th</sup>/50<sup>th</sup> ramps merely shifted to Montlake and the Portage Bay Viaduct for a short hop to I-5 via SR-520 and the new metered westbound on-ramp from Montlake. Under strong pressure from the City of Seattle to exclude any GP capacity expansion of SR-520, the study team has erroneously reported the traffic increase on the SR-520 approach to I-5 a result of the added GP capacity on the SR-520 bridge. It used this interpretation to maintain its prior decision to exclude an 8-lane alternative from further consideration.

C-036-005

### A 6/8-lane Hybrid Alternative

The ETA has proposed consideration of what we call a 6/8-lane Hybrid alternative. It strongly endorses the 6-lane Alternative from Foster Island through Montlake to I-5. It further strongly endorses the relocation of the Montlake Interchange to the new “Pacific Interchange” with a new overcrossing of the waterway to relieve the Montlake Bridge and the Montlake Community of SR-520 bridge traffic. We further propose metering of the westbound on-ramp from Montlake (or from the new interchange) to prevent more northeast Seattle traffic from overloading the I-5/SR-520 interchange. This would eliminate the condition that the project team has used as the reason to eliminate the 8-lane Alternative from further consideration.

Our proposal then focuses on relief of the existing bridge bottleneck condition that is unevaluated in the DEIS. From 35 to 45% of the bridge traffic desires to enter the corridor eastbound via the heavily metered Montlake and Lake Washington Blvd on-ramps, but with no added capacity on the bridge to absorb this major traffic inflow. To relieve the so-caused eastbound bottleneck, we propose addition of a third eastbound GP lane that would run from the Montlake (or new Pacific Interchange) on-ramp to 108<sup>th</sup> Avenue NE where it would interface with the four existing eastbound lanes on SR-520. This added GP lane would significantly reduce the Montlake Mess and traffic backups through the Arboretum (not addressed by the study team).

C-036-005

In the westbound direction, only 65% of the bridge traffic comes from the east of Bellevue Way via two GP lanes and the limited HOV lane. The other 35% of the bridge traffic that enters from the Bellevue Way and 84<sup>th</sup> Ave NE on-ramps must merge into these same lanes, causing the westbound corridor traffic backups often into Redmond. To relieve this westbound bridge bottleneck condition, we propose addition of a third westbound GP auxiliary lane from the four lanes east of 108<sup>th</sup> Avenue NE to the Montlake or Pacific Interchange off-ramp.

In summary, our 6/8-lane Hybrid alternative in conjunction with the new Pacific Interchange option would not only reduce bridge traffic impacts on I-5 compared to the No Build, 4-Lane and 6-Lane alternatives, it would also address and largely mitigate the existing bridge bottleneck condition of the corridor that has been unaddressed by the study team and its DEIS documents.

The 6/8-lane Hybrid would add little cost to the SR-520 Bridge Replacement project. The 6-lane Alternative would already require a complete rebuild of SR-520 and all of its over/under crossings from I-5 to I-405. The bridge pontoons are being planned for maximum width that could accommodate four lanes in each direction. The 6/8-lane Hybrid would require no further widening west of the new Pacific Interchange, and only an additional 24 feet of roadway width over water and thru the Points communities on the Eastside to 108<sup>th</sup> Avenue NE where SR-520 already has three to four GP lanes in each direction. The increased throughput more than offset the additional costs resulting in a lower toll of \$.75 per trip.

C-036-006

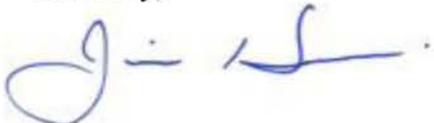
The primary corridor problem now and in the future is constraints to traffic flow out of Seattle in the morning and its return in the afternoon. When the bridge bottleneck causes westbound traffic backups beyond I-405 in the afternoon, it causes total breakdown of a large proportion of our Eastside street and highway system. This will become a normal daily occurrence in the future under the 4 and 6-Lane Alts.

We believe it will be embarrassing to the WSDOT if we spend \$3 billion on a total corridor rebuild between I-5 and I-405 yet provide no congestion relief for non-HOVs and freight traffic. It will add insult to injury for those same unbenefitted bridge users if they are to be charged tolls with no congestion relief. Tolls would likely cause some traffic diversion from the SR-520 lake crossing; but to where would that traffic divert? At the same time that WSDOT is proposing no congestion relief for SR-520, Sound Transit is trying to eliminate traffic use of the I-90 center roadway to allow its exclusive use by rail transit.

C-036-007

We respectfully request full consideration of our 6/8-lane Hybrid alternative in the FEIS and full disclosure of the bridge bottleneck that has been ignored in the presentation and evaluation of the 4 and 6-Lane Alternatives.

Sincerely,



Jim Horn, Chairman  
Eastside Transportation Association