City of Redmond
WASHINGTON

September 26, 2006

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

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

Dear Mr. Krueger:

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

L-001-001

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

L-001-002

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

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L-001-003

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

L-001-004

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

L-001-005

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

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

Sincerely,

Rosemarie M. Ives
Mayor of Redmond

Nancy McCormick
Council President

cc: Christine Gregoire, Governor of Washington

City of Seattle

Gregory J. Nickels, Mayor

Seattle Transportation
Grace Crunican, Director

Seattle Bicycle Advisory Board

L-002-001

September 26, 2006

Paul Krueger,

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

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

Thank you,

Sean Ardussi
Seattle Bicycle Advisory Board
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October 2, 2006

VIA E-MAIL AND MAIL

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

Re: SR 520 Bridge Replacement and HOV Project

Dear Mr. Krueger:

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

L-003-001

1. **Preferred Alternative**.

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

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

L-003-002

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

L-003-003

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

L-003-003

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

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

L-003-004

3. Tolling.

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

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

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

4. I-405 Expansion

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

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

Sincerely,

Bryan Cairns,
Mayor

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

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October 6, 2006

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

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

Dear Mr. Krueger,

L-004-001

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

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

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

L-004-002

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

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

L-004-003

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

L-004-004

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

L-004-005

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

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

L-004-006

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

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

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

L-004-007

Page 2-49 (*Fairweather Creek Basin)*

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

L-004-008

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

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

L-004-009

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

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

L-004-010

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

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

L-004-011

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

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

L-004-012

Page 4-19 (*Air quality*)

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

L-004-013

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

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

L-004-014

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

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

L-004-015

Page 4-28 (*Noise*)

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

L-004-016

Page 4-33 (*Construction Effects*)

- What are the hours of work?

L-004-017

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

L-004-018

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

L-004-019

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

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

L-004-019

Page 7-32 (*Fairweather Creek Basin*)

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

L-004-020

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

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

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

Sincerely,

Miles R. Adam

Miles R. Adam, Mayor
City of Medina

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

City of Bellevue
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October 9, 2006

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

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

Dear Mr. Krueger,

L-005-001

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

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

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

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

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

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

L-005-001

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

L-005-002

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

L-005-003

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

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

L-005-004

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

L-005-005

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

L-005-005

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

L-005-006

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

Sincerely,

Grant Degginger, Mayor
City of Bellevue

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

Richard Conlin
Seattle City Councilmember

October 13, 2006

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

Dear Mr. Krueger,

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

L-006-001

Size of the Design Alternatives

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

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

L-006-002

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

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

L-006-003 Effects on Parkland and Wetlands

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

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

L-006-005 Impacts of Construction

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

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L-006-006

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

L-006-007

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

L-006-008

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

L-006-009

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

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L-006-009

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

L-006-010

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

L-006-011

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

L-006-012

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

L-006-013

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

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

Sincerely,

Richard Conlin

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

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

RESOLUTION NO. 314

L-007-001

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

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

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

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

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

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

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

NOW, THEREFORE,

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

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

L-007-001

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

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

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

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

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

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

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

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

L-007-001

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

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

APPROVED:

Miles R. Adam
Mayor

ATTEST/AUTHENTICATED:

Rachel Baker
City Clerk

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

Fax

Date: October 20, 2006

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

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

John Nielton 206-381-6442

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

Pages: 4 (including cover)

Re: SR 520 Corridor Bridge Replacement Improvements

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

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

•Comments:

October 20, 2006

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

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

Dear Governor Gregoire and Secretary MacDonald:

L-008-001

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

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

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

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

L-008-001

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

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

Sincerely,

Rosemarie Ives
Mayor of Redmond

James L. Lauinger
Mayor of Kirkland

Grant Degginger
Mayor of Bellevue

George Martin
Mayor of Clyde Hill

Miles R. Adam
Mayor of Medina

David Cooper
Mayor of Yarrow Point

Fred McConkey
Mayor of Hunts Point

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

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

L-008-001

SR 520 Corridor and Bridge Replacement Improvements

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

POLICY INTEREST STATEMENT

October 2006

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

October 31, 2006

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

Dear Mr. Krueger:

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

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

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

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

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

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

L-009-004

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

L-009-005

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

   (1) the Pacific Street interchange is completed,

   (2) an eastside freeway station is retained, and

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

L-009-006

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

L-009-007

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

L-009-008

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

L-009-009

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

L-009-010

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

L-009-011

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

L-009-012

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

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

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

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

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

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

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

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

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

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

L-009-015

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

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

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

L-009-016

3. I-5 Interchange

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

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

L-009-017

4. Pacific Interchange

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

L-009-018

5. Elimination of the Montlake Freeway Station

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

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

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

(1) the Pacific Street interchange must be completed,

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

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

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

L-009-019

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

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

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

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

Key factors critical to facilitating effective transfers include:

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

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

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

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

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

8. Freeway Stations

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

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

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

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

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

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

L-009-021

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

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

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

L-009-022

10. Flexible Transportation Program and Construction Mitigation

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Harold S. Taniguchi
Director, King County Department of Transportation

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

Public Health
Seattle & King County

HEALTHY PEOPLE. HEALTHY COMMUNITIES.

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

October 31, 2006

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

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

Dear Mr. Krueger:

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

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

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

Environmental Health Services Division
999 Third Avenue, Suite 700 • Seattle, WA 98104-4039
T 206-205-4394 F 206-296-0189 TTY Relay: 711
www.metrokc.gov/health

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

L-010-004 Water Quality Issues - Water quality should at least remain the same or improve with the construction and use of a new bridge. Elements to consider in water quality include water quantity, stormwater, spill containment, and wetlands. Water quality and water quantity are inseparable. Any increase in impervious surfaces increases the quantity of stormwater. Therefore, appropriately sized containment is essential. Stormwater calculations should be provided for each option. Retention facilities should be discussed. Diagrams of stormwater discharge areas should be provided and current flows should be compared with any changes. The ability of the containment wetlands to handle heavy metals and other toxics should be monitored. Toxic spill response also requires appropriate and appropriately sized containment. Wetlands may not be the appropriate containment for spills. Spill containment, treatment and removal of

L-010-005 spilled materials should be discussed. As wetlands need to be replaced, they should be replaced one for one, with at least the same degree of quality wetlands being removed. Wetlands that are shaded should also be replaced one for one. The DEIS should make clear comparisons about water quality for each alternative as it has for noise levels.

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

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

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

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

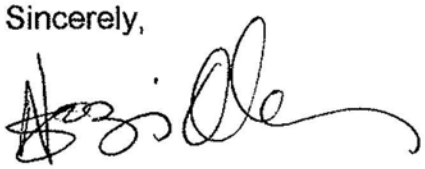
L-010-009 Prioritize public transit - All alternatives should have a strong transit-focus. Each alternative needs to be strongly associated with promoting modes of transportation other than single-occupancy vehicles. Comparisons of impacts to transit should be made.

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

L-010-011 Finally, Public Health – Seattle and King County suggests that a Health Impact Assessment be conducted for the alternative chosen. Health impact assessment (HIA) is commonly defined as "a combination of procedures, methods, and tools by which a policy, program, or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population" (1999 Gothenburg consensus statement, www.who.dk/document/PAE/Gothenburgpaper.pdf). Further information can be found at http://www.cdc.gov/healthyplaces/hia.htm or by contacting Anne Bikle at anne.bikle@metrokc.gov or 206 296 4794.

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

Sincerely,



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

NTO:dm

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

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

Dear Mr. Krueger,

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

Sincerely,

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

Department of Planning
and Development

700 5th Avenue
Suite 2000
P.O. Box 34019
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T: 206/615-1349
F: 206/233-7883

October 31, 2006

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

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

Dear Mr. Krueger:

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

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

Key Recommendations:

L-011-001

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

L-011-002

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

L-011-003

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

L-011-004

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

L-011-005

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

Mobility - Vehicles, Transit, Bicycles and Pedestrians

L-011-006

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

L-011-007

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

L-011-008

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

L-011-009

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

Noise

L-011-010

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

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

Visual Quality

L-011-011

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

L-011-012

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

L-011-013

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

L-011-014

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

Environment and Recreation

L-011-015

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

L-011-016

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

L-011-017

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

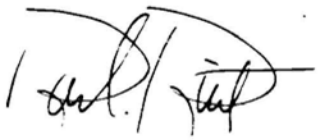
L-011-018

Summary

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

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

Sincerely,



Karen Kiest
Chair

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

From:	David Allen
To:	SR 520 DEIS Comments;
CC:	Babuca, Daniel; Krueger, Paul W (UCO);
Subject:	comment letter on 520 DEIS from City of Seattle
Date:	Tuesday, October 31, 2006 3:50:12 PM
Attachments:	Seattle 520 DEIS comment let FINAL.pdf

** Reply Requested When Convenient **

Paul,
Please find attached our comment letter.

This is a pdf and may be large, so I am sending the attachments mentioned in the letter in separate emails.

thank you,
David

David Allen, MCP
Senior Planner, Seattle Dept. of Transportation (SDOT)
Mailing address: PO Box 34996 / Seattle, WA 98124-4996
Physical address: 700 5th Ave. Ste. 3800 / Seattle, WA
206/733-9302 (v) 206/684-3635 (f)

Our offices are located on the 38th floor of Key Tower, 700 5th Ave, Seattle

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SDOT
Seattle Department of Transportation
Gregory J. Nickels, Mayor
Grace Crunican, Director

October 31, 2006

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

Dear Mr. Krueger,

I am writing on behalf of the Mayor to comment on the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement (DEIS.) The City appreciates the opportunity to comment on this important regional project and also appreciates the State's on-going involvement with the affected jurisdictions as this project moves forward. The City's detailed comments are attached for your consideration. I would like to highlight our key concerns as follows.

SIZE

L-012-001

Size of the facility must be reduced and more clearly conveyed in the EIS documents.
As the City has discussed with WSDOT, the width of the facility must be reduced. We request that WSDOT continue working with the City of Seattle on design modifications to narrow the facility through Seattle. Also, the FEIS should provide information on the width and height of the alternatives in more locations. The FEIS should also provide more visual renderings of the alternatives from various angles to provide a better understanding of the scale of the project.

IMPACTS

L-012-002

- **More examination of impacts to parkland and the Arboretum is required.** Examples of affected parklands which should receive closer examination include but are not limited to the following:

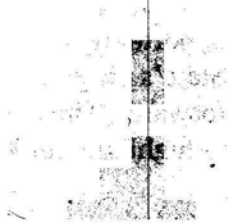
Seattle Municipal Tower, 700 5th Avenue, Suite 3900, PO Box 34996 Seattle, WA 98124-4996
Tel: (206) 684-ROAD (684-7623), TTY/TDD (206) 684-4009, FAX: (206) 684-5180
Internet address: http://www.seattle.gov/transportation

L-012-003
- The current model shows that the Pacific Street Interchange Option will increase traffic through the Arboretum. Traffic and noise impacts should be identified and assessed.

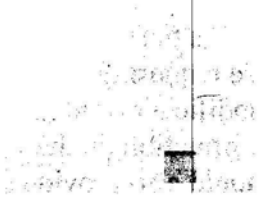
L-012-004
- Seattle Parks Department owns submerged lands which are used for aquatic recreation such as boating, fishing and wildlife viewing. These submerged lands are 4(f) resources and should be included in the assessment of impacts and potential mitigation.

L-012-005
- East Montlake and McCurdy Parks both contain SEPA protected views. These views are amenities of these parks and should be considered 4(f) resources. The Pacific Street interchange will directly impact these views and thus the 4(f) resource. Analysis of these impacts must be provided and the impacts addressed.

L-012-006
- **The FEIS should provide more information on construction impacts.**
  The State should provide information on the full impacts of construction on and from:
  - Temporary construction bridges
  - Possible closure of Lake Washington Boulevard ramps
  - The University of Washington
  - The Arboretum
  - Seattle neighborhoods
  - Local streets



L-012-007
- **The FEIS should provide more details on mitigation.**
  The State should provide detailed information on mitigation plans during and after construction for:
  - The University of Washington
  - The Arboretum
  - Seattle neighborhoods
  - Local streets



L-012-008
- **Fireboat issues**
  The Seattle Fire Department has raised concerns about the height of the mainline bridge, which would require certain fire boats to travel to the east side of the lake to cross under the new eastern high-rise. This would require additional minutes in travel time in each direction, costing precious time in responding to emergencies. In order to prevent this, the western high-rise would need to be higher than proposed. Please continue to work with the Seattle Fire Department on this issue.

L-012-009

- **Replacement, relocation and protection of utilities owned by Seattle Public Utilities (SPU)**

SPU will want to identify broken facilities, facilities that need replacement due to corrosion or other damage, or utilities which are undersized and need replacement. SPU would like to replace those utilities as needed during the project construction. SPU will also want to work closely with the project to identify which SPU utility facilities will need to be relocated due to project impacts and which SPU utilities can be protected in place.

PROJECT ASSUMPTIONS AND OUTPUTS

L-012-010

- **Some of the outputs of the transportation forecasting model do not appear realistic.**
  - The DEIS forecasts that in 2030 it will take approximately 100 minutes for a single occupancy vehicle to travel on SR 520 from Bellevue to I-5 in the morning peak hour. What does the model forecast for total travel time (from origin to destination) for the average SR 520 SOV commuter westbound in the morning peak hour?

L-012-011

  - The model shows an unrealistically high number of car trips traveling on Boyer Avenue East to and from the Arboretum. Boyer Avenue East is not designed to carry such a high volume of vehicles, the City has concerns about increased traffic through any part of the Arboretum, and the south entrance of the Arboretum at East Madison Street has constrained access. Given these factors, how will most of these trips be accommodated, if not on Boyer Avenue East?

L-012-012

- **The effects of important developments in regional planning and transportation policy could affect project need and design.**

The travel forecasting approach used in this DEIS for predicting 2030 bridge travel has not taken into account certain important initiatives currently under consideration in the region. The city is interested in the potential impact of these initiatives to help guide decision-making on this project. PSRC is currently considering an important shift in land use strategy for the region as part of their Vision 2020 update process. We believe that one of the alternatives in that process, "Metropolitan Cities," would have a substantial impact on the conclusions stated in this DEIS, especially mode share and total travel demand. We suggest that for the FEIS, WSDOT research the transportation results to date of PSRC's Vision 2020 update. Then, apply the conclusions about transportation impacts in the update to the SR 520 Project's assumptions. Would implementation of the

L-012-012

"Metropolitan Cities" alternative change the DEIS conclusions about travel demand and mode share on SR 520 in 2030?

L-012-013

- **The project as designed is not consistent with the realities of global warming or the Mayor's Climate Action Plan goals.**

The realities of global warming and the Mayor's Climate Action Plan call for the reduction of global warming gas emissions. The Mayor's Climate Action Plan calls for reduced driving. While the 6-lane alternative does not add general purpose lanes, it does not reduce SOV driving. The Climate Action Plan also calls for regional congestion pricing. (See comment on regional congestion pricing, below.)

L-012-014

- **Regional congestion pricing should be examined.**

The project model includes tolls on SR 520 in 2030 which are not optimized to manage demand on SR 520. The project model does not assume tolling on any other roadways and WSDOT wants to limit spillover effects from SR 520 onto other roadways. We believe this is an unrealistic assumption, given the intense interest that regional pricing is currently receiving from policy makers as a congestion management tool. Also, WSDOT's Congestion Relief Analysis study (March 2006) showed that, compared to a baseline condition, that pricing travel in 2030 on the major highway facilities around Puget Sound would substantially reduce the number of person trips across Lake Washington. The FEIS should investigate how implementing the pricing scenarios described in the WSDOT study would affect the traffic conditions on the SR 520 alternatives being evaluated in this DEIS.

L-012-015

- **Flexible Transportation Plan (FTP)**

Please confirm that the FTP only accounts for the demand management programs that are already assumed in the regional model and which are represented in the model as higher parking costs. Did WSDOT consider an FTP in the SR 520 corridor that surpasses the outcomes of the demand management program in the region in general? As one of only two transportation corridors across Lake Washington, SR 520 has great potential for demand management to have a strong impact. Are there reasons to assume that SR 520 would have no more robust a set of demand management programs than the region as a whole?

Attached is a matrix of more detailed comments on the DEIS from City departments.

Please note that I also sent a letter to David Dye, WSDOT's Urban Corridors Administrator, asking for additional information on the SR 520 Project. The City needs this information to make an informed decision on a preferred alternative recommendation. For your convenience, that letter is attached.

The City appreciates the State's consideration of these comments. The City looks forward to continuing to work with WSDOT and other parties to move forward on this important regional project.

Sincerely,

Grace Crunican, SDOT Director

SDOT

Gregory J. Nickels, Mayor

Seattle Department of Transportation

Grace Crunican, Director

September 29, 2006

Mr. Dave Dye
Urban Corridor Administrator
401 Second Ave. South, Ste 560
Seattle, WA 98104

Dear Dave:

L-012-016

This letter is to inform WSDOT of the City of Seattle's *draft* of a preferred alternative on the SR 520 Project and the criteria required for Seattle to support an alternative other than the Four-Lane Base Alternative. See attached draft resolution.

As the draft resolution indicates, the preferred alternative for the City of Seattle is the Six-Lane Pacific Street Interchange Option, but the City's fallback position is to preserve the current capacity of the existing facility with the Four-Lane Base Alternative.

More information is needed by the City of Seattle to make an informed decision on a recommendation on a preferred alternative. The City cannot select a final preferred alternative until we receive a satisfactory response on the following unresolved issues:

L-012-017

1. **Construction**
   - What are the construction impacts on Seattle neighborhoods?
   - What are the construction impacts on the University of Washington?
   - What are the construction impacts on the Arboretum, other parks and wetlands ?
   - What are the construction impacts on the Seattle transportation network, especially if the Lake Washington Boulevard ramps are closed during construction?

L-012-018

2. **Construction Coordination** How will WSDOT coordinate SR 520 construction with other construction projects by the University of Washington, Sound Transit and WSDOT?

L-012-019

3 **Mitigation and Addressing Impacts** What are the proposed mitigation packages and project designs to address impacts on the following areas?
   - Seattle neighborhoods
   - the University of Washington
   - the Arboretum
   - the Seattle transportation network, especially if the Lake Washington Boulevard ramps are closed during construction

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L-012-020

4. **Cost Estimates and Finance Plan**
   - What is the complete financial plan to fund the SR 520 Project in light of the recently increased cost estimates? In order to be realistic, the financial plan must include the additional costs of addressing impacts to the University of Washington, the Arboretum and Seattle neighborhoods.
   - What were the assumptions used in generating the new cost estimates? It is very unclear what was and was not included in these new estimates.

L-012-021

5. **Regional Tolling** How and when could the State employ tolls on multiple regional facilities in a coordinated system? How could regional tolling fit into the SR 520 finance plan?

Responses to these questions will provide fundamental information required to make a decision on a preferred alternative. Thank you in advance for your cooperation.

Sincerely,

Grace Crunican, Director
Seattle Dept. of Transportation

	"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-022	1. DEIS doc	1	1 - 6		1st full paragraph - The discussion of two-way congestion should be expanded to discuss what the traffic modeling shows for unconstrained demand - that is, even though peak hour flows are more or less equal in both directions, would that be the case if the current capacity constraints were removed.
L-012-023	1. DEIS doc	2	2 - 16		Paragraph under "What is traffic like on SR 520 today?" Again, the discussion of two-way peak travel should emphasize that it is capacity-constrained. (see comment on page 1-6 above)
L-012-024	1. DEIS doc	3	3 - 38		Paragraph under "Seattle." Where would treated stormwater from this facility be discharged to? Do Seattle Stormwater regulations apply to any of the runoff generated by this project?
L-012-025	1. DEIS doc	4	4 - 24		1st partial paragraph (discussing Energy). The reduction in annual vehicle miles traveled over SR-520 due to tolling should not be viewed in isolation. Would some of the traffic no longer taking SR-520 take other roads instead, such as I-90 or around-the-lake routes? And if so, would total annual vehicle miles increase due to the project?
L-012-026	1. DEIS doc	4	4 - 26		In the discussion of sound walls for the project, consideration should be given to potential uses of transparent sound walls in certain locations. This recent innovation can open up views from the highway and/or minimize view blockage from nearby residences yet still achieve substantial sound attenuation. The City would be happy to work with the project team to identify potential locations for such sound walls. (Comment applies to multiple locations in document, including 5-3 and 8-4.
L-012-027	1. DEIS Doc	4	4-14	8	Is there any other way to avoid bus stop and layover relocations caused by the Pacific Interchange option? What are the exact number of stops and layover spaces that will be affected? Is there adequate replacement space in the area? If not, will there be additional transit operating costs incurred?
L-012-028	1. DEIS Doc	4	4-33	14	What is the HOV lane definition? Is the project legally required to maintain a HOV lane definition indefinitely? If not, please provide impact information for each possible HOV lane definition, e.g. 2+, 3+.
L-012-029	1. DEIS Doc	4	4 15	Navigation	Identify the types of marine traffic using the Ship Canal, with a general description of vessel height, trip frequency, type of use (freight, government or other vessel use). The interest here specifically relates to freight demand and potential impact on freight movement.
L-012-030	1. DEIS doc	5	5 - 2		1st bullet point discussing actions to reduce project's visual effects. The City would appreciate being involved in the development, refinement and implementation of the design guidelines as it affects improvements within the City limits.
L-012-031	1. DEIS doc	5	5 - 6		1st partial paragraph on views. Discussion of vegetation replacement "in accordance with its (WSDOT) existing policies" should be expanded to include compliance with City policies and regulations as well.

SR 520 Bridge Replacement and HOV Project

	"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-032	1. DEIS doc	5	5 - 13		First bullet point concerning Fairview/Valley intersection. What does the DEIS and its traffic model assume concerning the City's Mercer Corridor project? The City is proposing major changes in the Mercer/Valley area between I-5 and Dexter Avenue North that would route both eastbound and westbound traffic on Mercer and turn Valley into a local, two-lane street. Its unclear from the DEIS text whether this is assumed in future year travel forecasts or not. And if not, the FEIS should model this scenario.
L-012-033	1. DEIS doc	5	5 - 15		First full paragraph - why is the bus trip demand nearly the same for the 4 and 6 lane alternatives, since the 6-lane alternative includes HOV facilities in both directions that should result in higher transit ridership?
L-012-034	1. DEIS doc	5	5 - 19		1st paragraph. The 2nd sentence states the wrong cause of noise. It should read: "This noise results from the proximity of SR-520 and/or I-5 to the many neighborhoods." The neighborhoods were here long before either freeway was built.
L-012-035	1. DEIS Doc	5	5-15	21-38	The FEIS should provide more specific information about the higher transit operating and capital costs associated with moving the Montlake Freeway Station and what the impact will be on Montlake and Capitol Hill residents. What is the impact on travel choices for people who live in these neighborhoods if the operating and capital improvements are not provided? Be more specific about the impact on transit riders south of the Montlake Cut under the No Freeway Station and the Pacific Interchange option who will have to cross the Montlake Bridge that opens for boat traffic, creating greater unreliability in a trip that previously did not have to cross the Montlake Cut.
L-012-036	1. DEIS doc	8	8 - 5		3rd paragraph under "Bridge Foundations." Are there other pile placement techniques that can be used in this situation, such as oscillating pile installation?
	1. DEIS doc	8	8 - 9 and 8 - 10		Discussion of staging areas should also discuss the impacts of the staging areas on surrounding land uses. Impacts include noise, light and glare, impacts on wildlife, …
	1. DEIS doc	8	8 - 15		First paragraph under "What routes would WSDOT use to haul construction materials?" The discussion mentions that during peak construction activities, 3 to 12 truck trips per hour could be generated by the project. When during the project would this occur and for how many months?
	1. DEIS doc	8	8 - 16 and 8 - 17		Discussion of "What would the project area look like while the project is being built" should include impacts of construction lighting and glare on surrounding land uses and mitigation to minimize such impacts.
	1. DEIS doc	8	8 - 19		Whether a noise variance is required or not, the project should commit to preparing a noise mitigation plan to address construction noise on surrounding neighborhoods.
	1. DEIS doc	8	8 - 20		First full paragraph - last sentence. How would noise impacts of this demolition work be mitigated for the Portage Bay Condominiums?

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	"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-036	1. DEIS doc	8	8 - 20		Again, how would light and glare impact the neighborhoods and parks and what mitigation is proposed to address these impacts?
	1. DEIS doc	8	8 - 21		How would recreational human-powered boat traffic (canoes, kayaks, rowboats) be impacted by construction, esp. in the area of the Arboretum?
	1. DEIS doc	8	8 - 22		Bullet points on top of page addressing mitigation of neighborhood impacts. Suggest preparing neighborhood-specific mitigation plans that would consolidate mitigation measures across discipline lines and add specificity to address neighborhood-specific impacts.
	1. DEIS doc	8	8 - 25		First full paragraph - how would the mitigation measures in the SPCC differ from those in the TESC? Examples would be helpful for the lay reader.
	1. DEIS doc	8	15		Add language that barges and water based construction will not interfere with emergency responses. If this is impossible, then specify how this will be mitigated.
	1. DEIS doc	8	29		Although the document talks about construction spills into water, it does not discuss how it will handle this problem. Please specify who will handle cleanup
	1. DEIS doc	8	33		Providing notice of the street closures is inadequate. Specify steps that will be taken to mitigate the negative impact on response times.
L-012-037	1. DEIS doc	9	9 - 5		Under "Transportation Projects," there would seem to be some potential cumulative impacts from the Alaskan Way Viaduct and Seawall Replacement Project and the Mercer Corridor project.
L-012-038	1. DEIS Doc	4 & 5	4-11 & 5-15	5-13	The FEIS should include an analysis of how the project will impact traffic/transit if the additional transit demand, 30% higher for the 4 lane alternative and 31 percent higher for the 6-lane alternative, is not met. Currently, the document only says that volumes and travel times will change. Will they go up or down? What is the size of the change? The document says that the additional transit service needed is neither planned or funded. This is partially true. The City of Seattle has a Seattle Transit Plan identifying an Urban Village Transit Network with high frequency, all day, all week, transit service. A major service funding gap needs to be filled to complete the network, however. Currently, if Metro tries to meet the service demand identified in the EIS, they would likely have to reduce service elsewhere in King County's west subarea (Seattle, Shoreline, and Lake Forest Park) given current service allocation policies, which have been adopted by the King County Council.
L-012-039	1. DEIS doc	Chapter 4	Page 4-23	2nd prgrph	The statement indicates that utility service could be disrupted or closed. Sewer service and storm drain service arel not to be disrupted or closed. This expectation is justified because these services are essential, and temporary piping or bypass pumping to maintain service is practical, economical, and an established standard practice in the construction industry.

	"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-040	1. DEIS doc	General			For large portions of the day, Lake Washington Blvd. through the Arboretum functions predominantly as a route to and from SR 520. All of the alternatives as designed will increase traffic through the Arboretum. Increased traffic and associated noise will negatively impact the visitor experience in the Arboretum, particularly at the Japanese Garden.
L-012-041	1. DEIS doc	General			If the Lake Washington Boulevard ramps must be re-opened upon completion of construction then other traffic management strategies should be included in the project design such as: Allow east bound traffic on Lake Washington Blvd. (LWB) to access SR 520 via a roundabout at the intersection of LWB and the SR 520 on/off ramp; repave LWB with "quiet" pavement; noise walls in sections of the Arboretum should be investigated, especially adjacent to the Japanese Garden; incorporate 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, toll the Arboretum ramps.
L-012-042	1. DEIS doc	General			By the term "local streets" the DEIS means arterial streets as opposed to the freeway facility. Most Seattle residents would define local streets as the non-arterial streets of the transportation system and might question why the DEIS does not appear to address possible impacts to this street classification. Specifically, residents of the neighborhoods within the study area are likely to be concerned about increased traffic volume and speeds on their streets.
L-012-043	1. DEIS doc	General			All of the project alternatives assume a growth in traffic and varying levels of congestion at key arterial intersections. The Pacific Interchange Option with its added capacity to Montlake Blvd. appears to show the fewest number of congestion intersections. In other words, this option maintains the best conditions for the arterial network overall. Each of the other alternatives show several severely congested intersections but it is not at all apparent how such congestion might influence traffic diversion through residential neighborhoods. One approach to address these concerns might be to reference any previous SDOT efforts to analyze and reduce traffic volumes and speeds in the adjacent residential neighborhoods; and indicate that SDOT (with WSDOT support) will continue to monitor potential "hot spots" and other streets where the department believes cut-through traffic might be likely to occur, both during construction and afterwards. Construction mitigation should include a plan and funds to undertake such monitoring and intervene if necessary, either with temporary or even permanent traffic calming devices.
L-012-044	1. DEIS doc	General			Once the 520 project is completed monitoring could continue for another year as traffic adjusts to the new facility. SDOT and WSDOT might consider a post-construction mitigation fund to meet the need for traffic calming intervention.

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"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-043 1. DEIS Doc	general			Please discuss impacts ot tolling on the different alternatives and the possibility of using toll revenues to fund needed transit improvements. Also, please discuss environmental justice impacts of tolling.
L-012-044 1. DEIS Doc	General Comments			The document present minimal information on and discussion of freight mobility. We suggest that more information be provided on current and future demand for commercial vehicles and trucks in general , including volumes and time of day characteristics.
L-012-047 1. DEIS Doc	General Comments			Identify the anticipated change in truck travel times associated with the alternatives.
1. DEIS Doc	General Comments			Chapters 4 and 5 do not discuss freight mobility. Discussion of freight mobility use, needs, changes, impacts and mitigation measures should be included in both chapters. The discussion should apply to proposed improvements on both the state highway system and the Seattle street system.
1. DEIS Doc	General Comments			1. Note that the Seattle *Comprehensive Plan* calls for the designation of a network of Major Truck Streets to serve as primary routes for the movement of good and services. The specific network of Major Truck Streets is defined in Seattle's ***Transportation Strategic Plan*** (TSP). A Major Truck Street is a street classification for an arterial street that accommodates significant freight movement through the City, and to and from major freight traffic generators. Some state routes and highways are also designated as Major Truck Streets on the network map. SDOT uses the designation as an important criterion for street design, traffic management decisions, and pavement design and repair. 2. Note that all Seattle arterials are considered to be truck routes, which are streets where trucks are allowed and encouraged to travel. 3. 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 city's policy is to protect and improve freight mobility on Major Truck Streets. This would be achieved via appropriate design measures and traffic management practices. For example, where lar
1. DEIS Doc	General Comments			
1. DEIS Doc	General Comments			
1. DEIS Doc	General Comments			Keep grades as level as possible for maintaining truck speeds. Discuss with SDOT the locations where vertical grades exceed 5% and the consequences of such a design.

	"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-047	1. DEIS Doc	General Comments			Note that the City of Seattle considers a truck design envelope of a 20' high X 20' wide vehicle for overlegal (oversize) loads on major truck routes. Vehicles in this category operate under permit, often with an escort. It would be beneficial where feasible to have the physical capability to accommodate an overlegal load on those routes anticipated for this trip type. The 20' clearance need should be considered under both roadway and pedestrian bridge structures. This would include SR 520, I 5, and Montlake Boulevard. Where routes are not amenable to allow this trip type, an alternative route would have to be used and identified.
	1. DEIS Doc	General Comments			All covered roadways and tunnel sections should be designed so as to avoid requiring restrictions on the transport of hazardous materials as defined by the Seattle Fire Code. Note that trucks transporting hazardous materials have certain time restrictions on I 90, which requires such trucks to take alternative routes, such as SR 520. Future lane management changes proposed for I 90 may restrict the transport of hazardous materials on a permanent basis. Identify the current and future demand levels for these types of trips, and estimate the impact on travel time for these type trips which take alternative routes.
L-012-048	1. DEIS Doc	General Comments			Traveler information is an important component of system success. Consideration should be given to having electronic message signs present combined messages on general traffic travel time and public transportation passenger travel time.
L-012-049	1. DEIS Doc	General Comments			Describe the characteristics of special event traffic that would use the facility, including number of significant events, general timeframes, anticipated impacts on non-event traffic, in particular truck traffic on freeway mainline, ramps and on arterial streets in the project area. Identify mitigation measures for truck impacts. These may include improved message signing, improved highway advisory radio (HAR), and timely travel alerts by other mechanisms.
L-012-050	1. DEIS doc	General, design, Pac I/C			Ramps to the Pacific Street Interchange should have the design characteristics, lane widths, and speeds of urban streets, as they must transition the motorists from a freeway designed, grade separated facility to a dense pedestrian urban setting. The design characteristics should relay this message.
	1. DEIS doc	General, non motorized, Pac I/C			Pac. St. I/C.: Briefly outline the considerations for including a bicycle/pedestrian facility on or parallel to the Lake Washington Boulevard Ramps. This would connect to the bicycle/pedestrian facility on the Union Bay Bridge, creating a non-motorized connection from the University to the Arboretum. Because the interchange has the three signalized intersections, would pedestrians and bicyclists be able to cross the ramps at the same grade at the interchange? If not, what opportunities are there for grade separation?

"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
1. DEIS doc	Overall			L-012-051 Suggested mitigation measures located throughout the DEIS and its technical appendices should be presented in greater detail in the FEIS and committed to in the Record of Decision. In a number of areas, including but not limited to transportation, noise, land use, water resources and visual quality, the City would appreciate being actively involved in the detailing of the mitigation measures as they impact City neighborhoods, traffic network and aquatic resources.
1. DEIS doc				
1. DEIS doc				
1. DEIS doc (ecosystems focus.)	General			L-012-052 Landscaping: large trees will be removed near the shoreline. The project should minimize the number of large trees to be removed and will need to discuss appropriate mitigation.
1. DEIS doc (ecosystems focus.)	General			L-012-053 Need to include specific information regarding the project impacts, both construction impacts and permanent long term impacts on juvenile and adult salmonid migration and on all other aquatic species that are expected to be in the project area. The report is vague on these impacts and it is difficult to compare the impacts of each alternative on the aquatic habitat and the aquatic species that depend on this habitat. A suggestion is to include tables that list the type of impacts that can be expected for construction and for the permanent operation of the highway. Construction impacts at a minimum should include: overwater coverage, (timing, size and location), staging (where and for how long), pile driving (location, size, timing, method, need to meet a performance standard for sound levels produced), and lighting (what kind, when operational, location), and water quality (contamination issues/risks, treatments to be used, location, timing).
1. DEIS doc (ecosystems focus.)	General			The permanent impacts should be compared to the existing conditions and any change in location of structures should be clearly identified. Where new structures are proposed (where no structures currently exist) a detailed discussion on the impacts of these new structures needs to be included.
1. DEIS doc (ecosystems focus.)	General			What lighting will be included on the new bridge and how will this impact both the aquatic and terrestrial environment. What lighting from vehicle use of the bridge will result and how will this impact the aquatic and terrestrial environment.
1. DEIS doc (ecosystems focus.)	general			Potential mitigation for unavoidable impacts needs to be included for impacts to the aquatic environment.
1. DEIS doc (ecosystems focus.)	general			L-012-054 **Habitat** The potential impacts are not clearly identified in a summary to help the reader the issues. Having to look through multiple chapters of the DEIS and through the appendices is difficult and may allow the reader to miss critical information. SPU suggests adding a summary on habitat issues. There also does not seem to be a place in the document where unavoidable, negative impacts are identified or how potential impacts are being addressed (e.g., applicable best management practices and/or mitigation).

	"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-055	1. DEIS doc (ecosystems focus.)	general			**Habitat** Impacts to fish should be thought of in terms of impact duration and intensity. From the document, it is difficult to identify a list of expected impacts. Adding a table that identifies potential impacts, their duration, intensity and consequences on fish would be very helpful for the reader. Are the impacts lethal or sub-lethal for salmon. How would construction only during the fish window alleviate impacts? What impact could using BMPs have? Which potential impacts need more information to adequately assess? Which potential impacts cannot be avoided?
L-012-056	1. DEIS doc (ecosystems focus.)	general			**Habitat** SPU has put together a sample table on tab [FISH IMPACTS] based on what we pulled out of the document. We caution that this table may not be accurate or complete and that the project should prepare one on its own.
L-012-057	1. DEIS doc (ecosystems focus.)	general			**Habitat** SPU would also suggest that there be detailed discussion added on potential impacts, what their consequences could be, and why/why not they were considered a large problem. The discussion about new support columns for the Pacific Interchange alternative and the effect upon predatory fish is an example where there is not any information to support the statement that "Designing the bridge columns with smooth vertical surfaces would not likely provide attractive habitat for predatory species… (Page 5-48)" What information was used to make that conclusion? A second example is the temporary low-level work bridges (appendix E page 136) – how would the bridges affect juvenile Chinook salmon and bull trout?
L-012-058	1. DEIS doc (ecosystems focus.)	general			**Habitat** It does not appear that the potential impacts of lighting, both during construction and operation of the bridge, were assessed for impacts to fish. A brief mention in the discussion of construction impacts in appendix E is the only information available. Given that lighting can attract fish and allow predators to feed throughout the night, lighting, both temporary and permanent, could be a very substantial impact of the project. This needs substantially more analysis and detailed discussion.
L-012-059	1. DEIS doc (ecosystems focus.)	general			**Habitat** The document repeatedly asserts that temporary unavoidable impacts would be "ultimately...offset by the overall improvement in water quality when the project is completed." That may not hold true for salmon, where one or two years of very poor water quality or other construction related conditions could cause severe mortality in the project area, which could wipe out a significant portion of the brood year of salmon in the basin. Recovery of an impacted brood year could take decades.
L-012-060	1. DEIS doc (ecosystems focus.)	general			**Habitat** The project should be monitored during construction and operation to ensure that project impacts are reasonable. For example, pile driving activities should be monitored for fish mortality and injury to ensure that mitigation measures, such as bubble curtains, are working as intended. Should the Pacific Interchange option be installed, juvenile and adult salmon movements through the area should be monitored for a number of years after the project is completed to ensure that fish are not being delayed in the project area or facing high predation pressure.

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L-012-061	1. DEIS doc (ecosystems focus.)	general			**Habitat** There is no discussion of how the project may affect other important fish species, such as long-fin smelt, which can provide a predation buffer for juvenile salmon. The document should include some discussion of predators and competitors with juvenile salmon, and how impacts that benefit or are detrimental to them play out for salmon.
L-012-062	1. DEIS doc (ecosystems focus.)	general			**Habitat** The document does not mention Puget Sound steelhead which are proposed for listing under the Endangered Species Act.
L-012-063	1. Deis Doc (F	3	24		The lower 43rd St bridge would prevent either the Chief Seattle or the newer Leschi from passing. The premise that the 'fast attack boat' would be a satisfactory solution is incorrect. We need more information on the draft west of the 43rd St. bridge.
L-012-064	1. Deis Doc (F	3	31		Under the 6 lane alternative, it should be clearly stated that there will be boat height clearance and draft for the largest Seattle Fire Boat. This removes the potential doubt.
	1. Deis Doc (F	3	Feb-00		There may be a need to establish an emergency response boat on the East side of Lk Washington. Using the 520 water based site may be an appropriate use for this purpose. This would likely be an unstaffed boat therefore requiring minimal landside support.
	1. Deis Doc (F	3	45		The clearance mentioned are inadequate for the fire boat. Unless WSDOT plans to pay for and staff a large platform fireboat south of SR-520, they should make plans for adequate height clearance with appropriate draft for the larger SFD fireboats.
L-012-065	1. Deis Doc (F	3	48		The incident response plan will need to include specific language as required by NFPA 502 for emergency responses. There is no mention of a plan to handle a major flammable liquid spill on the floating bridge. Having a few hundred to potentially 10,000+ gallons of gas dumped onto the bridge is significant and will need to be included in planning and design documents.
L-012-066	1. Deis Doc (F	4	23, 33		The document glosses over the significant negative impact that closing streets, bridges (Delmar) and general construction will have on emergency responses. A separate section should be set aside to address this concern and the specific mitigation efforts that will be taken. Working closely for notifications does not begin to address the impacts.
L-012-067	1. Deis Doc (F	5	3		It is possible that the combination of a Lid and Sound Wall will create a space that will need mechanical ventilation, additional exits, fire suppression systems, etc.
L-012-068	1. Deis Doc (F	5	34		The Pacific St Interchange 'increase travel time to Montlake' will need to be researched to determine the impact on emergency service providers.
L-012-069	1. Deis Doc (F	6	5		The CURRENT fireboat cannot go under a 25 foot clearance. The current and new fireboats will need substantially more height with corresponding draft. This issues must be addressed with Seattle Fire Department well before final designs are made.

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L-012-070 1. Deis Doc (F	6	5		Although the need to provide clearances and draft for the fireboat is ignored in earlier chapters, the problem is mentioned here. SFD will need to be able move their largest platform boats under the West end. The concept that there is room to decide "which fireboat in its fleet will serve Lake Washington in the future and ensure that it can navigate under the west approach structure in an emergency.for negotiation" is incorrect. Currently, the longer range plan is to have the Chief Seattle assigned to fresh water at Fishermans Terminal. They would respond to all Lake WA emergencies. However, due to events e.g. Seafair, or maintenance issues we could place the new Leschi into the freshwater. BOTH of these boats are higher than 25 feet. SFD registers concerns that the height limits on a new SR 520 bridge will adversely affect response times. SFD has found through experience that water based fire resources are critical to our abiliy to control fire in waterfront locations. The marinas and other large structures along Lake Washington need fireboat coverage.
L-012-071 1. Deis Doc (F	General			The document needs to recognize that NFPA 502 will be utilized to regulate the fire and life safety systems. 502 specifically addressed elevated and limited access highways.
L-012-072 1. DEIS doc (Public Services & Utilities focus)	general			**Replacement of Damaged, Broken, or Undersized SPU Utilities:** SPU would want to TV (use a robot with TV cameras) the utilities in the project area to identify broken facilities, or facilities that need replacement due to corrosion or other damage, or replace undersized utilities if needed other things. SPU would like to replace those utilities as needed them during the project construction.
1. DEIS doc (Public Services & Utilities focus)	general			**Relocations of impacted SPU Utilities:** Seattle Public Utilities will want to work closely with the project to identify which SPU utility facilities will need to be relocated due to project impacts.
1. DEIS doc (Public Services & Utilities focus)	general			**Protection of Impacted SPU Utilities:** Seattle Public Utilities will want to work closely with the project to identify which SPU utilities can be protected in place, rather than relocated due to project impacts.
L-012-073 1. DEIS doc (Public Services & Utilities focus)	general			**Water Quality and Aquatic Habitat**: Seattle Public Utilities is concerned about the impact of project construction, operation, and structures on both short term and long term water quality and habitat in Lake Union, Portage Bay, Union Bay and Lake Washington. These areas represent significant portions of the City's freshwater shoreline and it is important to maintain or improve the functions and values that these critical areas provide to salmonids.

"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
1. DEIS doc (Public Services & Utilities focus)	general			**Drainage** SPU would like clarity from WSDOT on future ownership and maintenance of the project's stormwater treatment facilities including the drains on the bridge. SPU has been responsible for maintenance of WSDOT facilities on the Alaskan Way Viaduct and other WSDOT facilities within the City of Seattle. Should that be a direction that WSDOT wishes to explore with SPU, we would request that SPU participate in the design of facilities that SPU may maintain at some point in the future Clarity on who maintains the actual facilities themselves, the facilities that the drainage systems may drain into, and who pays for potential upgrades is needed. Maintenance requirements/expectations must be clearly stated and designation of paying party clarified. SPU's GIS database indicates that the existing bridge does not have an elaborate system to maintain, but a new bridge will.
1. DEIS doc (Public Services & Utilities focus)	general			**Drainage** It appears that the project team is aware of the City of Seattle's stormwater code and other city regulations and requirements. SPU recommends checking code requirements at key intervals to make sure that federal, state, and local regulations are met and notes that the City of Seattle's stormwater code is slated for revision in the near future.
1. DEIS doc (Public Services & Utilities focus)	general			**Combined Sewer Overflow** The project does not have any significant impact to the combined sewer system. The existing bridge drains into storm drain pipes that drain directly into Lake Washington. Around the Montlake Interchange, the highway drainage also drains into storm drain pipes which discharge into three (3) outfalls into the Union Bay Area. These storm drains are maintained by City crews in the Montlake Interchange area.
1. DEIS doc (Public Services & Utilities focus)	general			**Water System** The water system impacts are not very large since the project area stays within the WSDOT R-O-W. There are some areas where the project area increases from the existing size may impact new areas. It may be too early to pinpoint the impacts or betterments from a water system standpoint. With the information available today there may be a need for some minor extensions.
1. DEIS doc (Public Services & Utilities focus)	general			**Water Utility Impacts** The area involved is already built up and the water system impacts are related mainly to relocation of facilities potentially in conflict with the proposed SR 520 Project, service outages, and depending on schedules, and overlapping impacts between the SR 520 Project, and Sound Transit's University Link Light Rail. A summary of possible affected water lines is presented in the on tab [WATER LINES]
1. DEIS doc (Public Services & Utilities focus)	general			In summary, we anticipate impacts, at a minimum, to SPU's water distribution system of 2- 12 inch water mains. In addition, two large pipelines are potentially affected (at Federal Ave. E. and Montlake Blvd.) and these will be more complex in managing project impacts.

L-012-074

L-012-075

SR 520 Bridge Replacement and HOV Project

"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
1. DEIS doc (Public Services & Utilities focus)	general			**Drainage Impacts** Drainage System conveyances that connect to an SPU system need to comply with the City of Seattle Stormwater, Grading and Drainage Control Code. SPU is anticipating that the Stormwater, Grading and Drainage Control Code will be revised before the SR 520 is initiated, but it is not known today what revisions will be adopted. Under today's code, generally, redevelopment requires stormwater water-quality facilities and an evaluation of downstream capacity of the existing storm drain. If capacity is inadequate, appropriate mitigation is required. Mitigation may be detention or increasing conveyance capacity. SPU may reject reconnection of areas to the combined sewer or require detention prior to connections. Specific requirements will depend on the specifics of the project and the code that is in place at the time.
1. DEIS doc (Public Services & Utilities focus)	general			**Drainage Impacts** The existing 520 roadway east and west of the Montlake interchange drains to systems that are displayed on City geographic information system database as SPU owned or maintained. Agreements for any project areas that will drain to City owned or maintained systems will need to be negotiated.
1. DEIS doc (Public Services & Utilities focus)	general			**Drainage Impacts** Pg 47, exhibits 42 and 43: Soil nails or tiebacks for retaining walls cannot be installed over or within excavation access zones of City of Seattle sewer or drain pipes.
1. DEIS doc (Public Services & Utilities focus)	general			**Drainage Impacts** The document contains statements that indicate that utility service could be disrupted or closed. Sewer service and storm drain service cannot be disrupted or closed. These services are essential and temporary piping or bypass pumping to maintain service is needed and an established standard practice in the construction industry.
1. DEIS doc (Public Services & Utilities focus)	general			**Drainage Impacts** The following combined sewer pipes need to be accommodated in the design and protected during construction:. • A 24-inch diameter combined sewer crosses SR520 just east of the 24th Ave. E. overpass. • A n SPU 66-inch combined sewer connects to a King County interceptor within the southbound Montlake Blvd to eastbound 520 on-ramp area. • An 8-inch combined sewer crosses SR-520 in the area of 19th Ave. E. • Combined sewers and sanitary sewers connect to the King county interceptor in the Pacific St, Pacific Pl., Montlake Blvd triangle area (Pg 4-23 2nd paragraph):

SR 520 Bridge Replacement and HOV Project

	"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-077	1. DEIS doc (Transportation focus)	general			The project should design the bus stops on 520 to BRT standards (attractive, well lighted, real time information)
L-012-078	1. DEIS doc (Transportation focus)	general			Describe the pros and cons of converting part of the existing lanes in the Pacific Street Interchange option to HOV lanes; specifically, assess converting lanes on the Union Bay Bridge and on Montlake Blvd. If the model does not show an obvious need in 2030 but converting the lanes would not dramatically affect overall person throughput, it is better to reserve the lanes when the project opens rather than trying to convert GP lanes to HOV lanes in 20-30 years when the those lanes are crowded with SOVs.
L-012-079	1. DEIS doc (water resources focus.)	General			Additionally, how will the larger floating bridge designs for each alternative affect water quality in Lake Washington such as water circulation (and therefore temperature)? How do juvenile and adult Chinook travel across the lake in the vicinity of the bridge and how will the new bridge affect this? How do juvenile and adult Chinook migrate and use the Ship Canal in the vicinity of the project and how will each alternative affect this behavior.
L-012-080	1. DEIS doc and Transportation Discipline Report	Index			Include "freight mobility" in the Index, with associated page numbers, similar to references to pedestrian and bicycle considerations.
L-012-081	1. DEIS doc and Transportation Discipline Report	References.			The reference list makes does not include the *Seattle Comprehensive Plan, Transportation Strategic Plan* or *the Seattle Freight Mobility Strategic Action Plan* . It does include a reference to the Seattle Bicycle and Pedestrian Program.
L-012-082	1. DEIS doc and Transportation Discipline Report				If there are references to "heavy vehicles" as a descriptors for trucks, I recommend that this be strongly avoided. Besides trucks that carry goods and services, vehicles that are technically heavy vehicles are passenger buses and fire trucks. I suggest that the authors avoid this inaccurate and oversimplification for the word "truck".

SR 520 Bridge Replacement and HOV Project

	"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-083	1. DEIS doc and Transportation Discipline Report				The City of Seattle has a Freight Mobility Advisory Committee. We suggest that WSDOT continue to confer with the Committee about any anticipated freight mobility problems in Seattle to obtain their feedback.
L-012-084	4(f)	General			Specific views from Bagley Viewpoint, Montlake Playfield, East Montlake Park, McCurdy Park are SEPA protected views under the City's SEPA Ordinance which should be identified as 4(f) resources. The DEIS has failed to address the impacts of the project on these views, particularly the impact of the Pacific Street Interchange on the SEPA protected views from McCurdy and East Montlake Parks. The view from Bagley viewpoint could be replaced on the proposed lid in that area. Options to replace the views (or mitigate the intrusion into the viewshed) from East Montlake & McCurdy Parks should be investigated by WSDOT and solutions proposed.
L-012-085	4(f) DR		2		Parks owns submerged lands which are used for aquatic recreation such as boating, fishing and wildlife viewing. These submerged lands are 4(f) resources and should be included in the assessment of impacts and potential mitigation.
	4(f) DR		15		The submerged lands associated with Montlake Playfield are used for aquatic recreational purposes. People launch canoes and kayaks from a put-in at the playfield and use the area for boating, fishing and wildlife viewing. These lands should be considered a 4(f) resource and protected accordingly.
	4(f) DR		39		The submerged lands associated with the Arboretum are used for aquatic recreational purposes. People launch canoes and kayaks from a put-in at East Montlake Park or from the University of Washington Canoe Center and use the area for boating, fishing and wildlife viewing. These lands should be considered a 4(f) resource and protected accordingly.

SR 520 Bridge Replacement and HOV Project

	"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-086	4(f) DR		93		Parking located in East Montlake Park is used by MOHAI patrons, but it is also used by individuals and groups to access the Arboretum Waterfront Trail and to launch boats from the hand carried boat access point. This parking and access point will be inaccessible during construction and permanently lost upon completion of the project. These impacts have not been identified by WSDOT and no mitigation has yet to be proposed.
L-012-087	4(f) Addendum		3		Potential impacts to the Japanese Garden due to increased noise & traffic on Lake Washington Blvd should be included in the analysis.
L-012-088	4(f) Addendum		20		East Montlake and McCurdy Parks both contain SEPA protected views. These views are amenities of these parks and should be considered 4(f) resources. The Pacific Street interchange will directly impact these views and thus the 4(f) resource. Analysis of these impacts must be provided and the impacts addressed.
L-012-089	4(f) Addendum		25		During construction, the detour bridge will preclude north south access along the Arboretum Waterfront Trail between Foster Island and the rest of the Arboretum. This impact to a 4(f) resource should be analyzed and the impact(s) addressed.
L-012-090	4(f) Addendum		49		Sound walls may reduce noise impacts, but the visual impacts of these walls through the Arboretum may outweigh the benefits.
L-012-091	AIR QUALITY DR		26		How will WSDOT make the decision as to which actions will be taken to control fugitive dust? How will this decision be conveyed to the City of Seattle and neighborhood residents?
L-012-092	Appendix A: Description of Alternatives and Construction Techniques		47	Exhibits 42, 43	Soil nails or tiebacks for retaining walls cannot be installed over or within excavation access zones of City of Seattle sewer or drain pipes.
L-012-093	Appendix D		2	Box	Title: What are the Criteria for Listing in NRHP? ("in", not "on") Same comment for first sentence of that paragraph, "To qualify for listing in the NRHP, ..."
L-012-094	tural Resource DR		1		8 lines from the bottom: Delete "Historic Preservation Program" and substitute "Landmarks Preservation Board

SR 520 Bridge Replacement and HOV Project

	"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-095	tural Resource DR		14		First paragraph: Delete first two sentences and substitute the following sentences: Historic properties within the City of Seattle may be designated as local landmarks by the Seattle Landmarks Preservation Board. Once a property is either nominated, designated, protected by a Controls & Incentives agreement or by a City Council designating ordinance, a Certificate of Approval is required for alterations, including demolition, of the features described at any state of the above landmark designation process.
L-012-096	DEIS Doc	General, non motorized, Pac I/C			Discuss the advantages and disadvantages of designing the crossing for pedestrians and bicyclists at the Pacific St./Montlake Blvd. intersection to separate pedestrian and bicycle movements from each other, as this is the connection from the Burke-Gilman Trail to SR-520 and can potentially draw significant bicycle volumes.
L-012-097	DEIS doc (ecosystems focus.)	general			**Habitat** Fish, and salmon in particular, could be substantially impacted by this project temporarily during construction and permanently once the new bridge is completed. Adult salmon returning to the Lake Washington watershed currently are migrating through a warm temperature Ship Canal a stressful environment. Juvenile salmon, and Chinook in particular, are also migrating through the project area during warmer months (June and some in July), as well as interacting with predators that thrive in warmer environments. The proposed alternatives, particularly the new Pacific interchange option, could add to stressful conditions for migrating salmon in the project area
L-012-098	DEIS doc (ecosystems focus.)	general			**Habitat** Construction of the bridge is likely to use barges to stage and deliver equipment and construction materials. Blocking the migration channel is briefly mentioned on page 8-25 and use of barges is discussed in appendix E, but there is no discussion of the consequences of barges and how it they may impact migratory salmon (e.g., delay or increased predation). This may be a substantial impact and may require mitigation.
L-012-099	DEIS document	General Comments			Trucks tend to slow down on an upgrade. Consequently, the truck travel speed decreases, and vehicles behind the truck also slow down, creating a temporary bottleneck. Discuss with SDOT the pros and cons of providing a truck climbing lane wherever a significant grade and associated problem is expected.
L-012-100	Ecosystems DR		118	paragrap h 1	There is a statement that says the increase in height of the proposed new structure will reduce shading affects but the width of the structure will offset the “decrease” in shading effect caused by the increase in height. However, in other sections of the document the assertion that the increase in height will offset the shading impacts caused by increase in width of the structure is made. These assertions are vague. Please provide specific information regarding what the shading affects of the new structure will be.
L-012-101	Ecosystems DR		120	3rd paragrap h	Under 6 Lane Alternative: How will there be an increase in riparian vegetation as a result of the project? Need additional information regarding how much, where, etc.

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	"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-102	ENERGY DR		1		With tolls resulting in fewer vehicle trips on SR-520, what is the assumption for the displaced trips? Will they be using other routes? Longer total miles? Would this result in additional energy use attributable to the tolling?
L-012-103	Exec Summary	2	ES2-54		2nd sentence in next to last paragraph: change to "for listing in the National . . . ."
L-012-104	General				The DEIS and Utilities Tech appendix provide a very cursory discussion of Seattle City Light infrastructure. We are concerned that the design & planning team may consequently and inappropriately discount the scope & impact of the project on our infrastructure. We need to have the opportunity to work directly with the design team to avoid costly surprises.
	General				Electric power for the Montlake neighborhood both north and south of SR 520, and west to I-5 is supplied by a single 26,000 Volt distribution feeder. The feeder originates from our University substation on the north side of the I-5 ship canal bridge. The portion of the Montlake neighborhood to the north of SR 520 is fed by a conductor attached to the 24th Ave E bridge over SR 520. Unlike other portions of this neighborhood, there is no alternate power supply source. Design and sequencing of temporary and permanent routes must be carefully thought out in concept engineering stages. Temporary 26 kV overhead distribution lines crossing over SR 520 during construction are probable.
	General				We were unable to find any reference to project bridge power demand. This information will be helpful for our near term planning.
	General				There may be an opportunity to coordinate SR 520 bridge power supply with the power supply for the future Sound Transit Light Rail station planned for the vicinity of the stadium parking lot. Please keep this in mind as design advances (Union Bay Bridge option).
	General				The temporary work bridges in Portage Bay, Union Bay and the Arboretum do not appear to impact City Light but we have concerns that as yet unidentified interim detour routes impact our operational capabilities. We will need to be included in discussions as traffic routing is developed.
L-012-105	GEOLOGY & SOILS DR		60		In the discussion of "Noise," mitigation for pile driving noise "would consist of limiting the working hours of pile drivers." To what hours?
	GEOLOGY & SOILS DR		60		There is considerable discussion of using air bubble curtains to protect fish from pile driving noise. Is WSDOT proposing to do so?
L-012-106	GEOLOGY & SOILS DR		62		The discussion of "Demolition Mitigation" states that contract provisions would specify no visible dust. How would this be measured and enforced?
L-012-107	GEOLOGY & SOILS DR		62		Between limiting pile driving work to daylight hours and avoiding work windows specified by resource/permitting agencies, would the work still be accomplished within the stated schedule?
	GEOLOGY & SOILS DR		64		The discussion of unavoidable negative effects mentions that limiting hours of pile driving could impact the project schedule. Yet it seems that WSDOT is proposing such a limitation. What is WSDOT's proposal in this regard and does the schedule reflect limited pile driving work hours?

	"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-108	HAZMATS DR		49		Given the seriousness of a hazardous material spill into Portage Bay, Union Bay or Lake Washington, more specificity in terms of mitigation should be provided. Mere mention of preparing a SPCC plan is insufficient.
	HAZMATS DR		50		Discussion of mitigation in Seattle should also include mention of preventing over-water releases of hazardous materials.
L-012-109	INDIRECT & CUMULATIVE DR		19, 26		What is the assumption for the Mercer Corridor project. The Transportation Discipline Report appears not to assume that the project happens, since there is no EIS issued for the project. Is that the same assumption for this discipline report? If so, the SR-520 FEIS should look at the cumulative and/or indirect impacts both with and without the Mercer Corridor project. That project's NEPA Environmental Assessment is expected out in early-2007.
L-012-110	and Use DI	General			General comment on the Appendix K. No study was done on the effects to the University District businesses or the businesses in and around University Village. There will be an impact to those and should be included in this chapter, especially during but also after construction.
L-012-111	and Use DI	General			There would likely be very positive economic impacts to Seattle after completion, especially with the 6 lane alternative. Construction impacts to businesses are not as bad as with most major projects. My comment was regarding U Dist. Businesses and Univ. Village area impacts during construction.
L-012-112	and Use DR		95		Replacing parking for the Seattle Yacht Club and replacing moorage for the Queen City Yacht Club may require shoreline variances as these private clubs are nonconforming uses (private clubs are considered institutions, and institutions are prohibited in the CM and CN shoreline environments.) This land use impact should be specifically identified.
L-012-113	vigable Waterw	All			There is no specific reference to the SFD requirement to maintain a navigable channel (and height clearance) for the large SFD fireboat to pass under the 520 structure at the West side of Lake Washington. This should be included as part of the document.
L-012-114	Noise DR	general			The four lane alternative should have the same lid construction as the six lane alternative. This would accomplish both reducing noise to the Eastlake neighbors on the south side of the SR 520 and reconnect the neighborhood. Reduced noise levels will occur only at the homes directly behind the noise wall in this area. Obviously noise walls are not effective where the residential structures are higher than SR 520.
L-012-115	Noise DR	general			All retaining and sound walls should have an acoustic retentive surface to capture noise.
L-012-116	Noise DR	general			During construction, the City's Department of Planning & Development would request that several permanent sound level meters be placed in strategic locations to monitor construction noise.

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L-012-116 Noise DR	general			The Department of Planning & Development requests that sound walls be installed around construction sites when effective; for example where staging is taking place (long term construction areas), laydown yards, material storage sites, fabrication areas, equipment bullpens, etc.
L-012-117 Noise DR				It is my understanding FHWA and WSDOT do not use occupied spaces above grade level in evaluating the effectiveness of sound walls. At night ambient levels are lower, traffic speeds are higher (louder tire noise) and random (differs from a constant hum). People trying to sleep in the upper floors will be impacted more than ground level receivers. The effect of the project on these users needs to be included and mitigation proposed for adverse impacts.
Noise DR				Please investigate the use of quieter pavement for the project.
Noise DR		102	exhibit 36	Exhibit 36 is used when using exhibit 35, construction noise is measured in Leq, exhibit 36 cannot be used in conjunction with exhibit 35 for a Leq measurement. Construction noise is measured in L eq, the exemptions are already included in the L eq measurement ("L eq" means the constant sound level that, in a given situation and time period, conveys the same sound energy as the actual time-varying A-weighted sound. The time period applicable must be specified.). You can't use the exemptions in a metric where the exemption is already included. Don't use Exhibit 36 when calculating construction noise levels.
L-012-118 Noise DR		103	op of page	Mitigating impact noise can be reduced for sheet piling installation by using a silent piler (GIKEN or equivalent). The City would recommend the use of this type of pile installation system. This system doesn't require a staging area, and works well in environmentally sensitive areas.
Noise DR		103	Alarms	All backup alarms will be required to be the "broadband type" backup alarm. If the WSDOT desires to work past 10 PM, they will need a noise variance issued by the city of Seattle. The noise variance will have performance conditions that make it mandatory that backup alarms be broadband and silencers on fossil fuel powered equipment be 5% quieter than the standard federal requirements.
Noise DR		106	Exhibit 40	All fossil fuel powered equipment will be required to use mufflers that are 5% quieter than the industry standard. If the WSDOT desires to work past 10 PM, they will need a noise variance issued by the city of Seattle. The noise variance will have performance conditions that make it mandatory that backup alarms be broadband and silencers on fossil fuel powered equipment be 5% quieter than the standard federal requirements.
Noise DR		107	op of page	Mitigating impact noise can be reduced for sheet piling installation by using a silent piler (GIKEN or equivalent). The City would recommend the use of this type of pile installation system. This system doesn't require a staging area, and works well in environmentally sensitive areas.
Noise DR		107	onstructio	The term should be "concrete mixer" not cement mixer.

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"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
Noise DR		107	tion and D	82-94 dBA is too loud for residential receivers; effective mitigation would be required at each affected residence.
Noise DR		108	Pile Driving	Sound levels in excess of L eq ninety-nine (99) dB(A) are prohibited. Per 25.08.425 of Seattle Municipal Code.
Noise DR		110	ruction Vib	Mitigating impact noise can be reduced for sheet piling installation by using a silent piler (GIKEN or equivalent). The City would recommend the use of this type of pile installation system. This system doesn't require a staging area, and works well in environmentally sensitive areas.
Noise DR		116	Mitigation	Nighttime Hours in the noise ordinance are from 10 PM to 7 AM weekdays and 10 PM to 9 AM Saturdays and Sundays
Noise DR		116	Mitigation	All fossil fuel powered equipment will be required to use mufflers that are 5% quieter than the industry standard.
Noise DR		116	Mitigation	Impact work can take place in the city of Seattle 8 AM to 5 PM M-F and 9 AM to 5 PM Sat. and Sun.
Noise DR		116	n Mitigatio	Sound levels in excess of L eq ninety-nine (99) dB(A) are prohibited unless authorized by variance obtained from the
Noise DR		116	Mitigation	The city of Seattle will manage the noise control and complaint program during construction of SR 520, though the project is encouraged to do their own monitoring to minimize the need for City enforcement activities
Noise DR		117	Mitigation	All fossil fuel powered equipment will be required to use mufflers that are 5% quieter than the industry standard.
Noise DR		117	Mitigation	Limit impact equipment to the stated hours 8 AM to 5 PM, Seattle Noise Ordinance limits that type of work to those exact hours M-F. What is the mitigation in this statement?
Noise DR		117	n Mitigatio	Notification to nearby neighbors; by what means will that communication take place?
Noise DR		117	n Mitigatio	Back-up alarms; only broadband back-up alarms will be permitted on this project. If the WSDOT desires to work past 10 PM, they will need a noise variance issued by the city of Seattle. The noise variance will have performance conditions that make it mandatory that backup alarms be broadband and silencers on fossil fuel powered equipment be 5% quieter than the standard federal requirements.
Noise DR		116		The use of transparent noise walls should be discussed here as an option to address potential visual impacts of the noise walls.
Noise DR		117		Ambient back-up alarms should be considered for use both day and night, since such alarms can meet OSHA safety standards and reduce noise impacts on surrounding neighborhoods.
L-012-119 PUBLIC SERVICES & UTILITIES DR	General			The rebuilt 24th Ave E bridge must be designed to accommodate SCL distribution lines, and we may also wish to coordinate with the project to allow a contingency for the Montlake Blvd and Union Bay bridges to accommodate distribution lines as well. Please keep us informed/included in this aspect of bridge design.

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"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-120 PUBLIC SERVICES & UTILITIES DR	General	17, 18		Pacific Ave and Montlake Blvd (north of the Montlake bridge) are a major corridor for 3 underground feeders serving areas north and east of the UW. Underground system relocation work is considerably more difficult and time consuming than overhead relocation work. A design which minimized or eliminated any relocation of these underground facilities (such as the Pacific St Interchange option) would simplify the project.
L-012-121 PUBLIC SERVICES & UTILITIES DR	General	1		Presently reads "No utilities would be affected by either of the build alternatives." This is not correct. Please revise to something like "Some utilities would need to be temporarily or permanently relocated during construction but there is no substantial difference in utility impacts for either design concept and the overall impact is expected to be moderate."
PUBLIC SERVICES & UTILITIES DR		30		The mitigation discussion for impacts to service and utility providers mentions "Ensure that BMPs are used at all times." What type of BMPs are contemplated here? Specific examples would be helpful to clarify the meaning.
L-012-122 PUBLIC SERVICES & UTILITIES DR		31		Emergency response vehicles will need access to construction sites, including temporary bridges, etc. The project should closely with SPD and SFD to ensure adequate access to all areas of the project in case of emergencies.
PUBLIC SERVICES & UTILITIES DR		28		Text reads "Access to the project area could be temporarily disrupted." Please note that City Light must have access to all of its infrastructure 24 hours/day, 7 days/week.
PUBLIC SERVICES & UTILITIES DR (Fire focus)				Does the project comply with NFPA 502? This will affect emergency plans, hydrants, etc. An elevated road with a lid and sound walls could create a 'tunnel effect' which brings in a host of other requirements.
PUBLIC SERVICES & UTILITIES DR (Fire focus)				Construction will have a far greater impact than conveyed in the document. Closing the Delmar would have significant impacts to response time for the Fire Department.
PUBLIC SERVICES & UTILITIES DR (Fire focus)				WSDOT should keep in mind that the construction impacts also impact fireboat responses.

"DEIS Document" or Disc. Report Name	Chapter	Page #	Line #	Comment
L-012-123 PUBLIC SERVICES & UTILITIES DR (Fire focus)				Where is there discussion about controlling a hazardous material spill on the floating or elevated bridge. The holding system should be large enough to hold spills or hazardous materials.
L-012-124 PUBLIC SERVICES & UTILITIES DR (Fire focus)				SFD fully plans to expand Fire Station 22 on site using additional property adjacent to the site. Negotiations have been underway to accomplish this. If this is not feasible, significant additional costs will occur.
PUBLIC SERVICES & UTILITIES DR (Fire focus)				Impact of construction will be considerable and may necessitate specific mitigation measures
PUBLIC SERVICES & UTILITIES DR (Fire focus)				Closure of the Delmar bridge for even a few hours will create the need for additional fire units to be added or other measures taken.
PUBLIC SERVICES & UTILITIES DR (Fire focus)				For Seattle Fire Dept. the problem with construction on or around water is primarily moving pontoons and equipment through narrow waterways which impede fire boats. WSDOT will need to coordinate with SFD and limit number and times of blocked access for fireboats.
L-012-125 Public Services and Utilities Attachment A		1 to 5		The "franchise holder" chart has several lines for City Light. It's not clear what this is identifying or if it accurately captures everything. Need to discuss this with project.

SPU has put together a sample table on tab [FISH IMPACTS] based on what we pulled out of the document. We caution that this table may not be accu

Potential Impact	Duration	Intensity	Consequences
New bridge structure over Union Bay	Permanent	?	Could delay salmon migration. For adult this could be very harmful, causing fish to hold in very warm waters until they are comfortable to pass
New support columns in Union Bay	Permanent	?	Could attract predators, leading to increased predation on juvenile salmon during out migration
Lighting of roadways	Permanent	High	Light tends to cause fish to aggregate, and also can allow predators to feed throughout the night, leading to increased predation on smaller fish.
Construction lighting	3-5 years	High	See above
Construction barges	3-5 years	?	Barges cause direct shading of in-water areas, which will affect how juvenile salmon and predator behave, could increase predation or otherwise decrease salmon survival
* for illustration purposes only, this table is not complete or accurate			

urate or complete and that the project should prepare one on its own.

L-012-124

Affected Water Lines The area involved is already built up and the water system impacts are related mainly to relocation of facilities potentially in conflict with the

Streets	Pipe Size	Pipe Type	Comment
MONTLAKE NEIGHBORHOOD			
Montlake Blvd NE.	54-inch	Steel – Lock bar joints	This is a major transmission line which cannot be shutdown easily and requires long lead times for shutdowns. Long lead time also required in any relocation or replacement is needed. Settlement and vibration needs to be avoided. Also this line is in a tunnel under the Ship Canal and construction and new facilities need to avoid the tunnel that lies at the bottom of the Ship Canal.
E. Shelby St./W. Park Dr. – E. Park Dr.	6-inch	Cast iron – lead joints	Impact depends on area of construction. Impacts such as direct conflicts, concrete paving removal/replacement or other heavy impact construction work may lead to relocation/replacement. Vibration and settlement issues are of particular concern.
E. Hamlin St./W. Park Dr. – E. Park Dr.	6-inch	Cast iron – lead joints	"
W. Park Dr. E./Shelby – Hamlin	6-inch	Cast iron- lead joint	"
E. Park Dr. E./Shelby – Hamlin	6 –inch	Cast iron – lead joint	"
Montlake Blvd. NE./from Ship Canal and south	2, 10 & 12-inch	Cast iron –lead joint and galvanized	"
E. Lake Washington Blvd./Montlake Blvd.	1-inch & 4-inch	Copper & Ductile iron	Relocation/replacement needed if conflicts or construction impacts. SPU may elect to increase size of this main if warranted.
24th Ave. E./E. Lake Washington Bl. – E. University Bl.	8-inch	Ductile iron	Impact concerns mainly with direct conflicts and construction impacts.
E. University Blvd. – east of 22nd Ave. E.	2-inch & 8-inch	Galvanized iron and ductile iron.	Impact concerns mainly direct conflicts and construction impacts. SPU may elect to increase size of 2-inch main and add approx. 1 block of additional water main.
E. Roanoke St. / 22nd Ave. E. – E. Lake. Wash. Bl.	Cast iron – lead joint, ductile iron	8-inch	Impacts due to direct conflicts, construction impacts, or excessive vibration and settlement may trigger need for replacement/relocation.

L-012-129

I-5 to PORTAGE BAY			
Boyer Ave. E. @ SR 520	20-inch	Ductile iron	Direct conflict or construction impacts may require either protection, replacement or relocation.
Federal Ave. E.	42-inch and 20-inch	Steel and cast iron-lead joint	Direct conflict or construction impacts may require either protection, replacement or relocation. This line may be difficult to shutdown due to it being a transmission line and
E. Roanoke St./I-5 – Boyer Av. E.	12-inch	Cast iron-lead joint	Impacts due to construction or direct conflicts may require replacement/relocation. Vibration or settlement monitoring may be required.

Since this project is at an early stage, this listing of potentially affected water lines is only an estimate and there may be other facilities affected. For instance, in construction the impact area for water utilities is larger than the area of direct impact, because the impacted service line may serve more than the area of direct impact.

proposed SR 520 Project, service outages, and depending on schedules, and overlapping impacts between the SR 520 Project, and Sound Transit's University Link Li

ight Rail. A summary of possible affected water lines is presented in the on tab [WATER LINES

From:	Barb Wilson
To:	SR 520 DEIS Comments;
CC:	Kirsten2 Pennington; Kevin McDonald; Valerie2 Kinast; Amalia Leighton; Tom Eanes; Tony To; Kirsten Pennington; Carl See; Chris Fiori; karen kiest; Kay Knapton; Mimi Sheridan; George Blomberg; Martin H. Kaplan; Linda Amato; Barb Wilson; Casey Hanewall; Casey Mills; David Allen; David Della; Emelie East; Greg Nickels; Grace Crunican; Guillermo Romano; Jan Drago; Jean Godden; John Rahaim; Layne Cubell; Michael Fong; Michael Mann; Nick Licata; Peter Steinbrueck FAIA; Phyllis Shulman; Richard Conlin; Richard McIver; Robin Magonegil-Wantoch; Sally Clark; Diane Sugimura; Tim Ceis; Tom Rasmussen; Nathan Torgelson; Steve Sheehy; Hilda Blanco; Jerry Finrow; Valerie Kinast; M. Michelle Mattox; Mahlon Clements;
Subject:	Planning Commission comments on the SR 520 Bridge Replacementand HOV Project DEIS
Date:	Tuesday, October 31, 2006 3:11:57 PM
Attachments:	520 DEIS Draft Letter to WSDOT Oct 31, 2006 Final.pdf 520 DEIS ReviewMatrix Oct 31, 2006 FIN..pdf

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Dear Ms. White:

Attached are the Planning Commission's comments on the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement. This includes a brief letter and a more detailed chapter by chapter Comment Matrix with specific comments on the DEIS analysis. The Planning Commission will be sending separate comments to the Seattle City Council Committee of the Whole on the R 520 Bridge Replacement and HOV Project which will focus more specifically on considerations for the City of Seattle in regards to this project.

Please feel free to contact me for questions or clarifications.

Thank you,

Barbara Wilson, Director

Barbara E. Wilson
Seattle Planning Commission
Executive Director
(206) 684-0431
barb.wilson@seattle.gov

City of Seattle

Gregory J. Nickels, Mayor

Seattle Planning Commission

Barbara Wilson, Executive Director

October 31, 2006

Megan White, Director
WSDOT Environmental Services Office
P.O. Box 47331
Olympia, WA 98504

RE: Seattle Planning Commission comments on the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement.

Dear Ms. White:

The Seattle Planning Commission appreciates the opportunity to comment on the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement (DEIS).

The Planning Commission is an independent citizen volunteer advisory body that provides advice and recommendations to City officials. As stewards of Seattle's Comprehensive Plan, our comments and recommendations focus on the SR 520 project's relationship to City planning goals, policies, and plans. The full Commission (with the exception of those who have recused due to conflicts of interest*) has reviewed specific sections of the SR 520 DEIS. **The attached Comments Matrix presents our specific comments.**

General Observations:

The three alternatives and their options present a range of potential solutions. We concur that the No Build Alternative would not meet the safety and transportation needs of Seattle residents; however we also believe that the other alternatives have significant disadvantages.

Both the Four-Lane and the Six-Lane Alternatives are consistent with the transportation goals outlined in Seattle's Comprehensive Plan. Both alternatives will have greater impacts to communities and the natural environment and the sheer size and scale causes us concern. The current choice on the table appears to be a choice between transportation and transit functionality with greater impacts versus a system that would not function as well but would be slightly less adverse. We remain open to the possibility that another solution may still exist.

L-013-001

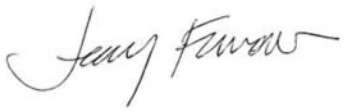
Based on our review we find that the Six-Lane Alternative provides increased opportunities to move people and goods, including transit mobility, in the near future. However, in terms of costs versus benefits, it remains unclear whether the Four-Lane or Six-Lane Alternative would be preferable in the long term due to a lack of clarity concerning how each would allow for the addition of high-capacity transit infrastructure. While the Pacific Interchange also provides increased opportunity for transit mobility, these benefits may be offset by potentially significant adverse impacts. Increased opportunity for both bus and high capacity transit is of enormous benefit to the region. However, we are particularly concerned about noise impacts, the health of the arboretum, the potential visual blight and unusual height of

L-013-004

the proposed sound walls and Pacific Interchange proposal, the increased impacts to fish and wildlife habitat, and the impacts to Seattle neighborhoods. There are significant issues that will require a great deal of thought and effort by the State if the Six-Lane Alternative becomes the preferred alternative.

Again, we appreciate the opportunity to provide our comments on this project, recognizing the magnitude of its importance to the community and region. We would be happy to meet with your staff at an upcoming Planning Commission meeting to discuss the SR 520 project and our DEIS comments.

Sincerely,



Jerry Finrow, Chair
Seattle Planning Commission

cc:
Secretary Doug McDonald, WSDOT
Mayor Greg Nickels
Seattle City Council
Tim Ceis, Emelie East, Nathan Torgelson, Michael Mann, Mayors Office
Michael Fong, Casey Hanewall, Council Central Staff
Phyllis Shulman, Council Staff
Grace Crunican, Bob Powers, Dave Allen, SDOT
Diane Sugimura, John Rahaim, DPD
Karen Kiest, Guillermo Romano, Layne Cubell, Seattle Design Commission

SPC RECORD OF RECUSALS AND DISCLOSURE

Commissioner Steve Sheehy ***disclosed*** *that he works for Sound Transit, who is a co-lead on the project. Commissioner Sheehy* ***recused*** *himself from all Planning Commission activities and discussion on this matter.*

Commissioner Kirsten Pennington ***disclosed*** *that her firm CH2M Hill had a large part in writing the draft. Commissioner Pennington* ***recused*** *herself from all Planning Commission activities and discussion on this matter.*

(Notes: Advisory board members are not required to disclose the nature of a conflict of interest that results in a recusal. Also Planning Commission policy allow Commissioners to recuse themselves even when the City's ethics policies do not dictate recusal).

Commissioner Jerry Finrow ***disclosed*** *that he is employed by the University of Washington which has a great interest in this project but that he has no financial conflict of interest thus is not required to recuse. In addition, Seattle Ethics and Elections Commission (SEEC) Director has provided Mr. Finrow with a Advisory Opinion that determined that he has no financial interest so must disclose on the record and to SEEC office but can participate in all Commission discussion and activities on this matter.*

Commissioner Amalia Leighton ***disclosed*** *that her sister is employed by EnviroIssues which contracts with WSDOT to assist in the 520 Public Involvement process. Commissioner Leighton has no financial conflict of interest and thus is not required to recuse.*

Commissioner Kevin McDonald ***disclosed*** *that he is employed by the City of Bellevue which has a great interest in this project but that he has no financial conflict of interest thus is not required to recuse.*

Commissioner Hilda Blanco ***disclosed*** *that she is employed by the University of Washington which has a great interest in this project but that she has no financial conflict of interest thus is not required to recuse.*

Seattle Planning Commission Review - October 31, 2006
SR 520 Bridge Replacements and HOV Project
Draft Environmental Impact Statement

DEIS Chapters	Comments:
L-013-002 General Comments	• The new format is user friendly. It makes technical information more accessible to the general public. It is a great contribution to making SEPA review more interesting to the average citizen. • The maps and computer enhanced photographs are very graphically appealing and useful. • Overall, the DEIS is very well written, with minimal technical errors. • There are a variety of areas throughout the DEIS where more subheadings, graphic renderings, comparison charts, tables and definitions would increase its clarity and accessibility to the average reader. • Certain aspects of the proposed alternatives for SR 520 should be explored further. In particular, the menu of options for noise reduction, bridge aesthetics, mitigation strategies for construction impacts, maintaining views, and bike, transit and pedestrian connectivity are sometimes either incomplete or lack depth.
L-013-003	• In general, the primary goal for the bridge rebuild other than increasing safety should be improving bike, pedestrian and transit connectivity. In keeping with Seattle's comprehensive plans, transit/bike/pedestrian connections should be top transportation priorities for this project. The Pacific interchange option seems to serve the transit connection better than the other options, though its visual blight is a major concern. Coordination with Sound Transit's light rail progress at the stadium will be critical. Improving pedestrian and bike connections are also critical. However, at times it seems the DEIS focuses more on increasing capacity for trucks and autos.
L-013-004 Chapter 1: Introduction to the Project	***General Comments:*** This Chapter was very approachable and easy to read. It gave an appropriate overview of the history and current options for SR 520 developments. The graphics were generally useful, particularly the diagrams of the lane options. The description of the working groups was useful for knowing the groups and individuals involved. The timeline of recent events assisted in knowing the context for action. The Chapter should not attempt to be both an Executive Summary and an Introduction. The Introduction should not be a discussion of the research results, nor should it present a distinct point of view. This information should be in the Executive Summary. Photos of the options being considered don't clearly show the full interchanges. Updated financials and other possible details will need to be included in the Final EIS. The impacts to 1-5 and I-405 during construction should be further explored in the Final EIS. Whether or not SR 520 could

L-013-004 support light rail should also be explored in the FEIS. Further explanation should be provided detailing why the Six-Lane option is the only option that could accommodate mass transit. Height comparisons of all the proposed alternatives for the SR 520 with other Seattle bridges should be provided.

L-013-005 ***Specific Comments:***

- *Purpose and Need*
  - This document refers to the project's purpose and need, yet it is not written as a purpose and need statement. More thought should be put into how the purpose and need is presented so that the reader understands that the purpose and need is the foundation by which all alternatives are developed, screened, evaluated, and selected. The way this Chapter is written, the emphasis is not clear. Too much information is presented in this Chapter. A purpose and need should be clearly stated and succinct.

L-013-006

- *Transportation*
  - In Section 1-2, third paragraph, first sentence, it is unclear how the project area faces an imperative of updating its role in transportation.
  - Whether or not SR 520 will be able to accommodate light rail should be further described and explored.

L-013-007

- *Mobility*
  - It was understood that this project was needed in order to make SR 520 seismically safe. If the bridge was in good shape and was not at risk, it would seem that we would not be looking at replacing it (given the financial constraints we face with the many mega-projects in the region). It is unclear then why the purpose and need expanded to increased mobility. The whole basis of this document and the development of alternatives seems rather convoluted, since the implied purpose is simply to create a safer facility.
  - In Section 1-11, third paragraph, last sentence, the sentence beginning "Therefore, the Four-Lane…." is totally contradictory to the last sentence in the previous paragraph. That sentence says that WSDOT has a four component plan to increase vanpools, carpools, and transit. Yet the DEIS says that mobility for goods and people will not be met, which ignores WSDOT's plan. It seems like a decision is already being made without doing the analysis. If transit and vanpools were increased, thus decreasing some autos, the mobility for trucks (goods) would then be improved. This part of the DEIS is troubling, as it seems like the whole analysis is tilted toward eliminating the Four-Lane alternative just because it won't bring more cars to Seattle or the Eastside.

L-013-008

- *Graphics*
  - Photos of the options being considered don't clearly show the full interchanges, particularly for the Pacific Avenue interchange. Describing locations in the body of the DEIS for additional information after the sections in Chapter 1 would assist in navigation.

L-013-009

- *Introduction vs. Executive Summary*
  - The Chapter is trying to be both an Executive Summary and an Introduction to a report. An introduction to this project, as

L-013-009

described (Section 1-1 caption), should set up the research and analysis that follows in the report. The introduction should not be a discussion of the research results, particularly since the EIS is meant to describe the alternatives and impacts (Sections 1-14 through 1-15) for further examination, not just state opinions on alternatives. The description of the alternatives (Sections 1-8 through 1-12) describe the conclusions based on the project goals (Section 1-8), therefore presenting a distinct point of view. This is appropriate for an Executive Summary and the conclusion/recommendation section, but does not provide an objective presentation of the considered alternatives. If such commentary is kept, the inclusion of the commentary should be explicitly stated when the alternative section starts (i.e. Section 1-8 should not just be described as 'project alternatives', but as 'conclusions on project alternatives').

- The Introduction seems to be placing too much emphasis on the alternatives, in particular Alternative Six and its options. This Chapter reads more like an Executive Summary and not an introduction. As such, the main point – why this project is being done – gets lost in all the unnecessary text.

L-013-010

- *Construction*
  - Construction impacts to I-5 and I-405 are a concern, and should be further explored.

L-013-011

- *Bridge Height*
  - It was not clear how much higher the Pacific Street Interchange (80 feet above the water) and Union Bay Bridge (110 feet above the water) would be in comparison to all of the other proposed structures.

L-013-012

- *Updates*
  - Updated financials and other possible details will need to be included.

L-013-013

- *Line by Line Comments*
  - Section 1, line 7: WSDOT has a goal of producing documents which can be read and understood by the general public. However, using the word "isthmus" in the first paragraph seems to be contrary to WSDOT's goal.
  - Section 1-2, sidebar: Please spell out the acronym FHWA. This is the first time it is used.
  - Section 1-5, second paragraph, line 5: It should be explained why hollow-core columns are difficult to retrofit.
  - Section 1-14, under "Who is leading…": This is the third time FHWA is used without explaining to the reader what or who FHWA is.
  - Section 1-15, second paragraph: Please explain what a Draft Section 4(f0 is. It is unclear why this needs to be mentioned in this location.
  - Section 1-15, third paragraph: This paragraph seems condescending. Please rewrite so that you are not talking down to the audience.

L-013-014 Chapter 2: The Project Area, Then and Now	***General Comments:*** Information in the chapter thoroughly cover the history of the area including the transportation and land use plans for the areas, the current status of neighborhoods, environmental issues facing them, including noise, air quality, water quality of the Lake. ***Specific Comments:*** • *Arboretum* o This chapter does not adequately address the arboretum. It does not adequately address the traffic impacts to the arboretum particularly given its historical importance. The DEIS recognizes that the arboretum has never been evaluated for its significance. We believe you should evaluate it and suggest that Section 106 is applicable.
L-013-015 L-013-016 Chapter 3: Developing the Alternatives	***General Comments:*** The information provided in this Chapter is quite thorough, and appears to support replacing SR 520 with the Six-Lane Alternative. However, this Chapter is occasionally difficult to understand. Additional information, tables, and subheads should be included in the Final EIS to increase its clarity. In addition, the portion of the Chapter dealing with the movement of people and goods appears to be rather one-sided. Pontoons should be discussed further in the FEIS. The Chapter should explain why the Six-Lane Alternative being proposed would be built so high above water level. The sound walls will have enormous visual impacts. However, graphic depictions of these walls after construction are wide angle and do not provide an accurate depiction of how they would look. The need for the walls at all is debatable, since the noise mitigations appear to do little to reduce noise for residents surrounding the bridge. Further study should be done on the affect of noise reflection off of the walls. Further study should also be done of a 'no-build' option and its affect on nearby residents (analyzing the noise impact in particular). More study should be done on how to consolidate a transit hub on the north side of the Montlake cut and further analyze what options exist concerning building a Montlake bridge. Connecting Madison Park to SR 520 with several bridges seems unnecessarily damaging to views and the environment, especially when the Montlake connection could be used instead. In addition, more information needs to presented regarding the ability of the proposed facility to accommodate high capacity transit in the future. How the conversion would work should be documented. Whether or not the general purpose and/or HOV lanes would be converted should also be documented. ***Specific Comments:*** • *Mobility* o The fourth paragraph in Section 3-8 seems rather one-sided. It says the movement of people and goods would be marginal, but it should give solid numbers to back up this statement. For example, it should account for the ability for buses to move easier because of shoulders (moving stalled vehicles over, etc.), as well as pedestrians and bicyclists.

L-013-018

- *New Pacific Interchange*
  - The bridge itself, illustrated with the appendix, seems insensitive to the surrounding natural beauty and environment, including residents of the University, Laurelhurst, Montlake, and other neighborhoods. Its lifeless and extraordinarily ordinary concrete appearance suggests a lack of consideration for arguably one of our State's most treasured waterways. With that said there are real advantages to the Pacific Street Interchange. While there will be serious impacts to the University of Washington and the Arboretum, the interchange could be a tremendous public benefit in gaining an intermodal transit station and transportation lines. It will be of utmost importance that the Final EIS outline how it will better address offsetting these significant impacts.
  - The illustration of the span unfairly depicts the span in wide angle and does not capture the fact that while being a rather ordinary concrete freeway overpass-like bridge, it sits almost twice as high as the Montlake Bridge. Its clearance is 110' while the existing Montlake Bridge is just over 50.'
  - The DEIS suggests that WSDOT wants to consolidate a transit hub on the north side of the Montlake cut, and thus has proposed the Pacific Interchange. While this solution may respect improved future intermodal connections, the cost to stakeholders and users alike should be closely considered. It remains possible that the second Montlake Bridge option may offer opportunities to preserve Union Bay, have a more appropriate scale, and cost less than the Pacific Interchange Bridge. It still remains unclear if the benefits of the Interchange are worth the cost.
  - The Pacific Interchange and bridge, as currently envisioned appears to be disruptive to the University. The DEIS should incorporate new ideas to connect the Montlake cut and transit related needs. The DEIS suggests that the second Montlake Bridge solution eliminated the SR 520 transit stop. There must be more thoughtful and appropriate options.

L-013-019

- *Sound Walls*
  - The height and location of the sound walls along the entire corridor from I-5 to I-405 has not been depicted within the DEIS with a sense of confidence and understanding of the true visual impacts. In reviewing plates 3.1a, 3.1b, and 3.5b one clearly identifies the proposed locations for these walls but must dig into the appendices to retrieve any illustrative example of the impacts. These illustrations are woefully understated, utilizing very wide angle perspective that diminishes not only the impacts of the rebuilt bridge but of the sound walls completely.
  - The corridor on the east side often parallels wooded areas and undeveloped land and may have a lesser impact. However, the sound walls on the west end of the bridge create huge walls that pile up upon an already elevated bridge platform that sits some 40' above the water level, twice as high as the bridge entry in the Union Bay site today. There are no illustrations that depict the actual impacts of the sound walls due to the wide angle perspective of the illustrations. The new bridge over Portage Bay also shows huge sound walls that are also depicted in illustration with very wide angle views-not a true measure of the impact.
  - The need for the sound walls is debatable and the documentation and engineering providing a foundation for the need for these walls is questionable. These walls are designed to be 20' tall in places on the bridge and the illustrations and engineering design suggest a pattern of decibel reduction that is only locally limited, and in fact their greatest impact lies adjacent to the walls.
  - As soon as one measures the decibel reduction 100' away the mitigation is reduced. What appears to be missing is a study of the reflected noise from the opposite side sound wall. The need for these walls on the bridges appears suspect because of the reflected

L-013-019

noise and the fact that those impacted properties lie well outside the zones for immediate mitigation.

- There does not appear to be a serious attempt at analyzing a 'no-build' option and its impact on those properties surrounding Portage Bay and Union Bay. The fact that those living in the neighborhoods impacted by the rebuild already are impacted by the 'din' of the roadways may be an important discussion considering the fact that the city is 'noisy'.

L-013-020

- *Bridge Design*
  - The DEIS states that the new bridge would be twenty feet higher than the existing. However, it is unclear where in the DEIS the height of the existing bridge is documented. (a similar type of statement is made in Section 3-13, but once again, the size of the current bridge is not documented).
  - The concept of converting the Four-Lane or the Six-Lane bridge to a roadway/transit facility needs to be further discussed and presented. Exactly how this word work should be explained.
  - For some reason that is not clearly articulated and supported within the DEIS, the new design section supports a new bridge deck above floating pontoons and columns-resulting in a bridge that will sit some 30' above where it lies today. This has an incredible environmental impact and visual interruption. There is some discussion of the reasons pertaining to future rail; however, the I-90 bridge was designed with a similar program allowing for rail and appears to rest some 20' or more lower to the water level.

L-013-021

- *Madison Park/Bicycle/Pedestrian Path*
  - While there is a need to connect adjacent neighborhoods and Bike/Pedestrian opportunities to the SR 520 corridor, the solutions to connect Madison Park to SR 520 with several bridges seem arbitrary and could be harmful to preserving fragile ecosystems, stakeholder views, and environmental harmony. These bridges are depicted as connecting only Madison Park via long bridges spanning over sensitive habitat. There may be no compelling need to interrupt such important and fragile environments. While there would be a convenience in making this connection, walking or riding a few more miles to the Montlake connection could be much simpler and would respect the natural land and waterscapes more. Those connections from the neighborhoods on the west side of Lake Washington might be easily satisfied at Montlake.

L-013-022

- *Exhibits*
  - Exhibits 3-1a, 3-3a, and 3-3c are all missing legends. If someone were reading this as a single sided document or online, they would not be privy to the legend on the opposite page (odd page). Please add legends.

L-013-023

- *Clarity*
  - The entire discussion in Section 3-22 is hard to follow. Maybe using subheadings would help

L-013-024

- *Six Lane Options:*
  - A comparative table would be very useful. There is too much text to follow the discussion.

L-013-025 Chapter 4: Comparison of the Alternatives	***General Comments:*** This Chapter is well done. However, a comparative table that summarizes everything would be extremely helpful. Steps that could be taken to reduce the effects of construction on various parties should be further explored, as should alternatives to the current noise reduction proposal and bike/pedestrian path proposal. The DEIS should document where increased transit funding to address increased ridership will come from. It seems a continuous path from Montlake to the existing SR 520 is a good idea.
L-013-026	***Specific Comments:***
	• *Parking* o The possibility that better transit access and service make up for the lost parking supply should be explored.
L-013-027	• *Bus Transit* o Funding for transit service would have to be increased to meet ridership projection. Where this money will come from should be addressed. Closing the Montlake and Evergreen Point Freeway stations is an adverse impact to the transit riders in the nearby neighborhoods and the region.
L-013-028	• *Light Rail Transit* o Light rail is critically important to plan for ST2 and SR 520 together, especially if the Pacific Interchange option is selected. Seattle Comp Plan calls for establishing multi-modal hubs providing transfer points between transit modes in urban centers and urban villages (Transportation Element A, T5). It also calls for working with transit providers to design and operate transit facilities and services to make connections within the transit system and other modes safe and convenient. Integrate transit stops, stations, and hubs into existing communities and business districts to make it easy for people to ride transit and reach local businesses. Minimize negative environmental and economic impacts of transit service and facilities on surrounding areas and; working with transit providers to ensure that the design of stations and alignments will improve how people move through and perceive the city, contribute positively to Seattle's civic identity and reflect the cultural identity of the communities in which hey are located. (Transportation Element C, T25)
L-013-029	• *Pedestrian/Bike* o A continuous bike/pedestrian path from Montlake all the way to the existing SR 520 path in Bellevue is a good idea. It does not seem that these should be gaps between NE Points Drive in Kirkland to the NE 24th SR 520 trailhead in Bellevue. Seattle Comp Plan specifically calls for improving mobility and safe access for walking and bicycling, and create incentives to promote non-motorized travel to employment centers, commercial districts, transit stations, schools and major institutions, and recreational destinations (Transportation Element C2, T30); and T34 to Provide and maintain a direct and comprehensive bicycle network connecting urban centers, urban villages and other key locations. Provide continuous bicycle facilities and work to eliminate system gaps (Transportation Element C2, T34). These goals and policies should be given considerable weight in assessing

L-013-029	pedestrian and bicycle considerations.
L-013-030	• *Project Aesthetics* o Landscaping adjacent to noise walls should be provided wherever possible. "Tree screens" do not provide the significant sound attenuation that is implied in this document.
L-013-031	• *Community Cohesion* o Pedestrian and bicycle connections are very important in helping the project meet Seattle's Comp Plan goals. Transportation Element C TG9 states that transportation projects provide programs and services to promote transit, bicycling, walking, and carpooling to help reduce car use and SOV trips.
L-013-032	• *Construction Effects* o Construction effects should be reduced by expediting and providing incentives for a speedy construction plan that does not inconvenience transit riders during construction.
L-013-033	• *Environmental Justice* Tolling would have an adverse effect primarily on SOV drivers. HOV and transit would be not adversely affected. Seattle's Comp Plan clearly supports programs and strategies aimed at reducing SOV car trips and miles driven (for work and non-work purposes) to increase the efficiency of the transportation system.
L-013-034	• *Ecosystems* o Unless upstream areas are capable of supporting salmonids, it does not make much sense to spend a lot of money to remove fish passage barriers. Where new wetlands would be created, or when restoring degraded wetlands, efforts should be made to locate those within the same watershed.
L-013-035 Chapter 5: Detailed Comparison of the Alternatives - Seattle	***General Comments:*** There should be more discussion of the various options. Options to improve the aesthetic appearance of the bridge in particular are not adequately explored. Projected regional growth should be considered when developing the plan for SR 520. Special attention should be given to ensuring adequate pedestrian, bike and transit connectivity, as well as connectivity for drivers to I-5. The building of the new bridge could serve as an opportunity to greatly improve transit and lure new riders to public transit. Alternatives to the current proposals for noise reduction should be explored. More visuals should be provided to better understand the aesthetic and environmental impacts.
L-013-036	***Specific Comments:*** • *Corridor Aesthetics/Visuals* o The corridor aesthetics handbook is a great idea. There is not currently enough information on the aesthetics of the sound

L-013-036

retaining walls along the bridge, or how the aesthetics of the bridge as a whole will impact views from the Arboretum and the Husky stadium area. Exhibit 5-1 is well done. More of these types of exhibits from more angles should be provided, particularly with respect to the Pacific Interchange option.

- The project is unexciting because all the alternatives look bulky, massive and clumsy. More creative ways to make the structure look less clumsy should be explored, while retaining the same engineering characteristics. Possibilities include tapering the columns, making the structure look more like a series of arches, or adding a more monumental finish above the deck instead of sound walls. With the Pacific Interchange, the location is directly in the middle of Portage Bay, so mitigation can't simply be a technique to make it less visible. For safety reasons it is doubtful the girth could be sacrificed but should be carefully analyzed. However, the mitigation could be some kind of addition - monumental, ornamental or otherwise that might divert the eye from the blight at the water level if less ugly, bulky columns cannot be devised.

L-013-037

- *Noise*
  - It remains unclear if WSDOT investigated the use or rubberized roadway for SR 520 as it has for the Viaduct replacement. It is also worth exploring if speed limits set at 50 MPH would reduce the need for the bulky sound walls. The main concern here is the presence of the sound walls, which might pose a greater visual problem than the auditory one is was designed to solve.

L-013-038

- *Bike/Pedestrian/Transit Connections*
  - In keeping with Seattle's comprehensive plans, transit/bike/pedestrian connections should be top transportation priorities for this project. The Pacific interchange option seems to serve the transit connection better than the other options, though its visual blight is a major concern. Coordination with Sound Transit's light rail progress at the stadium will be critical. Improving pedestrian and bike connections are also critical.
  - Linkage between Sound Transit station and the SR 520 transit stop near University of Washington Hospital was discussed. However, this should be a multi-modal transit station/terminal so people have maximum flexibility in using the transit resources to get around the region. Cooperation between the various planning/project entities is essential. The shared costs certainly present the opportunity to save taxpayers money.

L-013-039

- *Regional Growth*
  - Improved transit links across Lake Washington are likely to make Seattle even more attractive to the young, upwardly mobile professionals who like the urban environment of the city but work at hi-tech companies on the eastside. The look at regional and community growth could consider what development pressures are likely to occur. For example, in order to accommodate the suggested growth for the region, whether or not residential demand in Montlake could be satisfied with land use changes that encourage mixed use, denser development along 23rd should be explored. Whether or not an expanded bridge would hasten the "gentrification" of Madison Valley could also be addressed.

	• *I-5 Connectivity* o The Chapter made no mention of how SR 520 would access I-5. Proposals as to how the increased volumes merging with I-5 should be documented. While this could be beyond the scope of the bridge project, improvements that address the "Mercer weave" issue should be considered. • *Historical Notes* o When projects are built "on the cheap," residents live to regret it. I-5 opened in 1963 and immediately exceeded planned capacity. SR 520 was built without shoulders to handle broken down or disabled vehicles. • *Visuals* o It is not clear the scale of the bridge compared to cars, humans, boats and animals. In general, more visuals should be provided to give a clearer picture of the environmental and aesthetic impacts of the various options.
Chapter 6: Detailed Comparison of the Alternatives – Lake Washington **Commissioners Assigned:**	***General Comments:*** There is not enough information on the current impacts of the existing bridge provided. There is no information on the impacts during the phase of the project when two bridges exist. The impacts on views should be further explored, as well as options that would maintain views for those using SR 520. There should be further discussion of WSDOT's plans to mitigate surface water runoff, including where water treatment facilities will be placed. The DEIS should provide more information concerning access to Lake Washington. Much of the information in Chapter 5 regarding fish should be placed in this Chapter. More visuals should be provided to give a clearer picture of the environmental and aesthetic impacts of the various options. ***Specific Comments:*** • *Views* o Little information on the visual impacts of the sound walls in the Union Bay/Arboretum/Madison Park area is provided. A reference to the discussion in Chapter 5 of these impacts to Lake Washington would have been helpful. o It appears the computer simulations in this Chapter do not include the sound walls. o There is no mention of a Scenic Route designation of the highway along Lake Washington in this Chapter, and little description of how scenic views from the new bridge would be affected by the sound walls. There should have at least been a reference to the discussion in Chapter 5 of this. o Views down to the lake and shoreline from SR 520 along the south end of Lake Union, by Marsh and Foster Islands, are valuable. Not just the view over the lake to the Cascades and Mt. Rainier are important. This experience of seeing one of the only natural shorelines of the Lake and observing people canoeing and swimming there is very enjoyable. It is a very unique visual situation. The sound walls will alleviate this view completely. The benefit of noise reduction may outweigh this, but it is an impact that should be disclosed.

L-013-043

- The proposal to create design guidelines and take other measures to ensure aesthetic quality in this corridor should be pursued. Please consult with the Seattle Design Commission on these measures.

L-013-044

- *Stormwater*
  - WSDOT proposes mitigating for increased surface water runoff by providing new storm water treatment facilities. Part of the water treatment measures would be directly in the lake, in "the lagoon enclosed by the pontoons." There was only brief mention of this as a mitigation measure, but no discussion was included on the possible negative impacts of this on the lake. Whether or not WSDOT has experience with this type of storm water treatment facility should be examined.
  - Besides the water treatment in lagoons in the lake, there was no mention of where the other water treatment facilities would be located in this Chapter. There is information in Chapter 5. Questions remain concerning whether the storm water mitigation is taking place entirely within the watershed or in the basin, as well as whether storm water treatment facilities would be built primarily in natural or developed areas.

L-013-046

- *Lake Washington*
  - The DEIS should explain how the project alternatives will change access to the shoreline of Lake Washington in Seattle, and explore if the changes on the MOHAI site will make the water more accessible. In addition, the DEIS should examine if parking for recreation uses or the recreation facilities along the water neat the University of Washington and Montlake would be eliminated. The DEIS should also address how access to the water would be affected in this area under the various alternatives. (There is discussion of impacts to parks in Chapter 5, but not all of these concerns are addressed there.)

L-013-047

- *Animals*
  - Information on fish was put in Chapter 5, and not in Chapter 6.
  - Although this Chapter addresses the shading of the bridge alternatives in the middle of the lake, it does not address this impact in the shoreline, riparian zone along the south of Lake Union, by Marsh Island and Foster Island. That information is found in Chapter 5.
  - Impact of the alternatives on fish migration was not mentioned in this Chapter on Lake Washington. This is an important portal to Lake Washington for fish. The different alternatives would have varying degrees of impact on this. This information is only included in Chapter 5.
  - Those involved with the project should work closely with Seattle DPD environmental planners, the tribes and Washington Department of Fish and Wildlife on issues concerning fish habitat.

L-013-048

- *Cultural Resources*
  - Producing documentation, and making public, information on the existing bridge before it is removed is a good idea.

	• *Visuals* o Exhibit 6-1 (Chapter 6, Section 6-2) does not provide a reasonable schematic. In general, more visuals should be provided to give a clearer picture of the environmental and aesthetic impacts of the various options.
Chapter 7: Detailed Comparison of the Alternatives – Eastside	***General Comments:*** More explanation should given concerning the possible use of lids to mitigate noise, as well as how decibel levels are compared to one another. The estimates for anticipated increases in traffic demand/capacity seem overly optimistic. More information should be provided concerning the various transit alternatives being considered prior to the opening of the Six-Lane Alternate. The statement that regional and community growth will not change regardless of which option is chosen does not seem correct. ***Specific Comments:*** • *Noise* o The decision to lid parts of the Eastside approach within the Six-Lane Alternative only should be explained, perhaps within this Chapter, in a brief discussion, or a review from another Chapter. This would help explain why the Six-Lane Alternative qualifies for lids but not the Four-Lane Alternative. o The DEIS suggests that lids 'would' mitigate noise impacts from SR 520. This statement seems too optimistic and unfairly suggests that there may be little to no noise impacts at all. The DEIS should fairly describe the anticipated reduction created by the lids. o There is a continued thread within this Chapter and presumably others related to decibel levels. There are numerous points made within this Chapter related to decreased and increased decibel levels and arguments made that certain design solutions including lids and sound walls will reduce decibel levels by specific amounts. Unfortunately there is no base-line described for comparison measurement. These figures should include a description of present levels and comparisons to anticipated design solutions. Stating that there will be an 11 decibel reduction doesn't prove anything. • *Traffic Demand/Capacity* o The Chapter discusses the anticipated increases in traffic demand/capacity through 2030 and only suggests an increase of 4% for the Four-Lane and 2% for the Six-Lane over the next 24 years. During construction of the bridge on the Eastside, there was a tremendous increase in demand immediately, no less than what will likely happen when more capacity is provided when a new bridge (either configuration) is completed. The reasoning as stated relies upon the fact that because there will be tolls, traffic will seek alternate free routes. However, these figures seem overly optimistic. • *Transit* o The Chapter states that there is 'no increase in transit funding at this time,' even though the Six-Lane Alternate relies upon a dramatic increase in transit level of service. There should be a comprehensive plan and explanation of the transit alternatives that will be contemplated and in place prior to the opening of a Six-Lane Alternate.

L-013-050	• *Regional and Community Growth* o The DEIS suggests that 'Regional and community growth would not materially change between the no-build alternative and the build alternatives.' This is difficult to believe given the history of growth on the eastside, the PSRC Vision 20/20 growth forecasts for Urban Centers, and the natural outgrowth created by increased capacity, especially with the Six-Lane Alternative. • *Line by Line Comments* o Page 7-16, middle of the page: There exists a possible error. The sentence reads: "Except where noted, the effects of the Six-Lane Alternative options would not differ from those of the Six-Lane Alternative." However, one of these alternatives should read Four-Lane instead of Six-Lane.
L-013-051 Chapter 8: Construction Effects	***General Comments:*** Overall, this Chapter is well written and clear. However, much of the information in the first five pages should go in the 'Alternatives' Chapter, since it is discussing the elements of the project, not the actual construction phasing. Also, a lot of the discussion regarding water quality and impervious surfaces would be excellent in the impacts Chapter. Further explanation of noise and vibration mitigations should be provided. ***Specific Comments:*** • *Noise* o How noise would be mitigated during the evening periods if a variance is granted should be explored. • *Historic Properties* o There is no discussion of mitigating vibration. The DEIS should document whether or not an analysis was done to determine how far from the source the vibration would travel, as well as if any historic structures exist within that zone. • *Construction Employees* o In the first paragraph of Section 8-12, construction employees should be addressed. This section only discusses truck hauling. • *Line by Line Comments* o Section 8-6: Please define/explain "finger pier." o Section 8-31, second paragraph: If possible, please include route detour plans. Not everyone wants to look in the appendices for this important information
L-013-052 Chapter 9: Other Considerations	***General Comments:*** The CEA review is decent. It is always a difficult analysis, but this one was relatively good. There should have been more detail on the process. This may exist in an appendix. CEQ requires that geographic and temporal boundaries are identified for the cumulative effects

L-013-052	analysis, but this information does not seem to be in the DEIS. The DEIS should detail how far back the study went, how far into the future it goes, and the parameters of the study area.
L-013-053	***Specific Comments:*** • *Line by Line Comments* o Section 9-3, first sentence: Add an "s" after 'effect.' o Section 9-4, third paragraph: The phrase "on the books" should be explained. It could mean the projects that are planned, funded, or under construction. Please be clear o

Town of
Serving Our Residents
Hunts Point

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October 31, 2006

John C. Milton, P.E.
SR 520 Project Director
414 Olive Way, Suite 400
MS NB82-99
Seattle, WA 98101-1209

Subject: SR-520 - 84th Ave NE Interchange Designs

Dear Mr. Milton,

L-014-001

As we have discussed with you and your staff, the Town of Hunts Point has requested that WSDOT evaluate alternate traffic lane configurations for the 84th Avenue on-ramp with the new SR520 Bridge.

We are seeking a solution to improve the flow of traffic on SR520, which will lessen congestion on local streets in Medina, Clyde Hill, Yarrow Point, and Hunts Point. As you know, all of our neighborhoods suffer from the consequences of commuters cutting through our local residential streets to get to the last ramp on 520, thus avoiding huge back ups on 520 that sometimes stretch back the 148th.

Hunts Point has retained Transportation Solutions Inc. (TSI) to review and develop alternative access configurations that would minimize impacts on all our neighborhoods, while improving the operation of your proposed six-lane alternative. TSI's "Alternate Configuration" calls for the construction of a westbound HOV onramp off the lid, directly into the HOV lane, similar to the HOV onramp configuration on I-90 at Island Crest Way. Additionally, we propose double stacking on the SOV onramp to lessen back ups on 84th and Points Drive.

This alternative was recently prepared by TSI, and has not been fully discussed or sorted out by the Mayors of the Points Communities for potential benefits and/or additional problems. We intend to analyze this Alternative with WSDOT over the next few months. Better ideas may evolve from those discussions.

It does, however, seem obvious to me that an HOV ramp entering from the right lane of 520 is a problem. Alternatively, with HOV entering in the center lane, it should reduce mainline congestion by eliminating the need for HOV traffic to weave from an outside onramp across two general purpose lanes into the inside HOV lane. Often 520 SOV lanes are at a stand still on the freeway, so merging HOV traffic would stop and back up too. All of this merging and weaving is

L-014-001

occurring in the section where the freeway climbs up from the 84th Ave. NE onramp, compounding the congestion even more.

Although we have not provided much detail in the attached Alternative Configuration, TSI proposes three lanes coming across the 84th Avenue lid, as it is today. Headed north, the lanes would be;

1. SOV lane to loop on-ramp, which possibly splits to two lanes for additional stacking on the ramp. (eastern most lane)
2. Center Lane for access to Hunts Point, and for HOV traffic that would turn left at the middle of the lid, yielding to a,
3. Hunts Point egress lane (western most lane, not much traffic exiting Hunts Point)

The benefit of this configuration is to improve the flow of 520, thus lessening congestion south of the lid.

Recognizing that the Draft Environmental Impact Statement indicates that WSDOT will incorporate evaluation of alternatives to the interchange design, we ask that this alternative be studied to reduce the impact of cut through traffic in our neighborhoods.

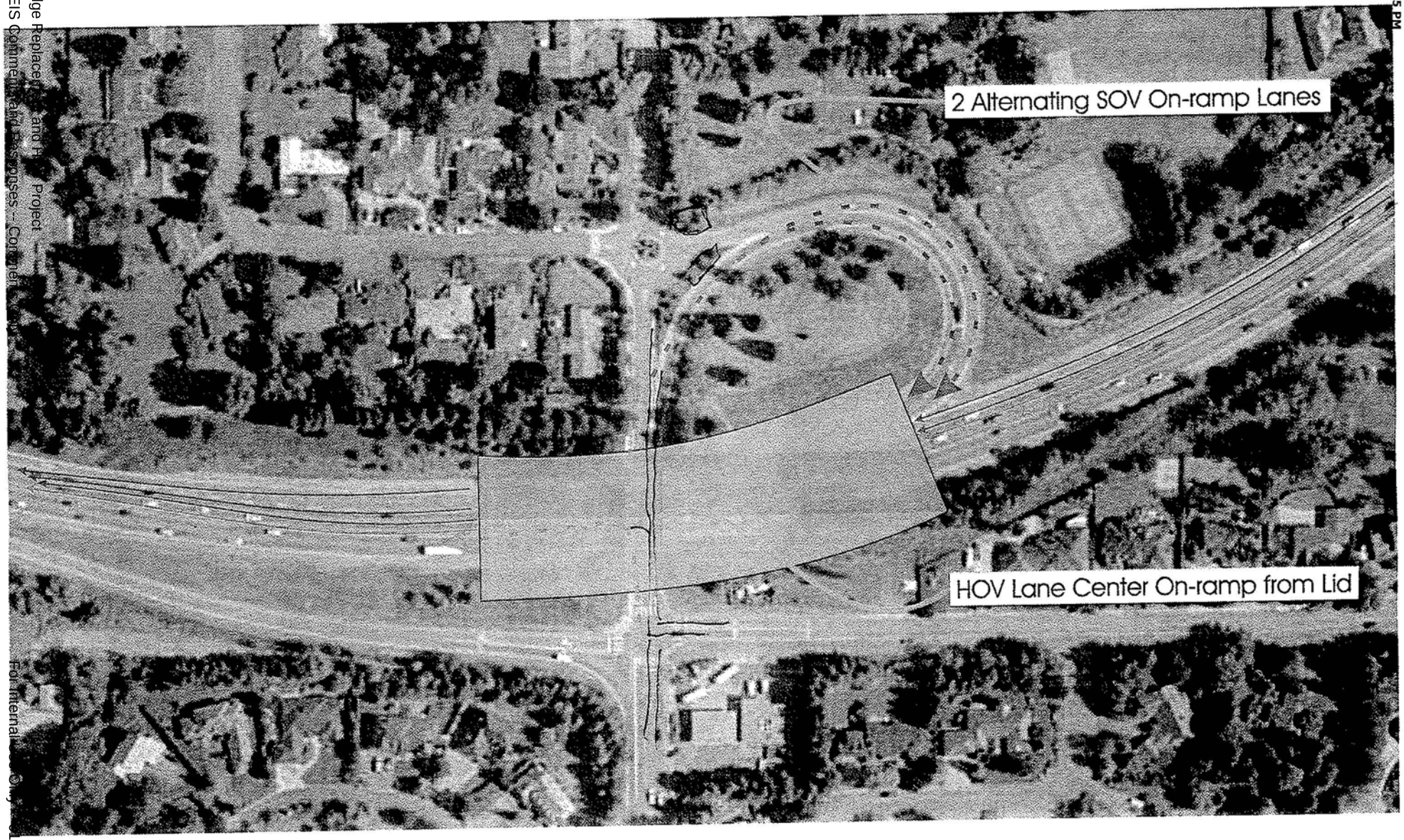
Thank you again for working with us. We welcome further discussion as you proceed forward with analysis of this proposed interchange modification and other design refinements.

Sincerely,
Town of Hunts Point

Fred McConkey
Mayor

Attachment

cc. Mayor George Martin
Mayor David Cooper
Mayor Miles Adam
Paul Krueger



SR-520 and 84th Avenue NE Interchange
Alternate Configuration

Hunts Point

From:	Larry Howard
To:	Krueger, Paul W (UCO);
CC:	
Subject:	Released from eSafe SPAM quarantine: Mr. David Cooper 520 DEIS Letter
Date:	Wednesday, November 01, 2006 7:26:46 AM
Attachments:	520 DEIS Oct-06.doc

Dear Mr. Krueger:

Attached is the 520 DEIS letter that Yarrow Point Mayor David Cooper stated that would be sent to you per his email to you this morning. If you have any questions please contact me at Yarrow Point Town Hall, (425) 454-6994. Thank you very much for your attention.

Larry Howard

(Clerk/Treasurer)

TOWN OF YARROW POINT

4030 – 95th Ave NE
Yarrow Point, Washington 98004
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townhall@ci.yarrow-point.wa.us

October 30, 2006

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

Dear Mr. Krueger;

Thank you for the opportunity to comment on the DEIS for the expansion of SR 520. As you know, 520 crosses through a portion of the Town of Yarrow Point, adjacent to Clyde Hill and adjacent to the Town of Hunts Point. The existing Right of Way has hosted a popular 5.6 mile trail called the Points Loop Trail, that connects these three communities and Medina and Kirkland to valued habitat preserves and parks along the way.

Trail alignment

L-015-001 The Points Loop Trail is to return to "recreational use after construction". However, the August 18th DEIS on Page 7-18, Exhibit 7-11, shows the revised trail going through the private property of the proposed Fairweather Trail Short Plat. The graphic is unclear, and confused with the "Limits of Construction" line, so analysis and understanding are elusive.

Please clarify the intent for the Points Loop Trail; what is to be a temporary condition for the period of construction only, what is to be the final trail alignment, what properties are being impacted for both the temporary and permanent alignments of this trail and what actions are required to secure either the properties or easements to cross them.

We are mindful of the Section 4(f) Evaluation section that impacts to recreation areas, public parks and wildlife or waterfowl refuges are prohibited unless there is a feasible and prudent alternative, and the project includes all possible planning to minimize harm to the property. What actions are proposed to minimize harm to the resources adjacent to this valuable recreation element? Is there to be a walkway on NE 33rd as partial replacement? How is the crossing of 92nd Avenue to be handled?

Noise, Screening and Vegetation Loss

L-015-002 The DEIS proposes to utilize the existing HOV lane that exists today on the north side of 520 through this area for the purposes of construction. During that period of construction, it is to be assumed from maps included in the DEIS that the limit of construction includes all DOT owned right of way. Today this area provides some protection to neighboring residents against noise and views of the highway. We are concerned about the loss of this vegetative buffer during the long construction period, yet find no remediation of these impacts during the construction period.

We also understand that the project proposes to move to the north in the right of way, and, in the long run, see no helpful discussion of adjacencies of residences to this final alignment, or of the final disposition of the north line of the highway with respect to these nearby homes, nor sections

L-015-002

showing vertical and horizontal distances between them and the roadway. Residences in this area are considerably higher than the highway, so we are concerned that sound walls adjacent to the highway would not have an effect on noise to adjacent residences west of 92nd Avenue NE.

We would request no further impact to those properties that were divided in the 1963 development of SR 520, and ask that provision be made in the planning for construction that noise and buffering be addressed with these residences in mind.

Lids

L-015-003

Included in the DEIS for the 6-lane alternative are two 500 foot-wide lids (should be 3 including the Evergreen Point lid in Medina) whose purpose is to "reconnect" the neighborhoods divided by the existing highway. The Town of Yarrow Point would like to discuss this proposal, as would the City of Clyde Hill and the Town of Hunts Point with WSDOT when a final proposal is made for the width of the highway. Should the 6-lane option emerge as a preferred alternative, it is likely that relocation of the proposed lid for 92nd Avenue N.E. and possibly also the lid for 84th Avenue N.E. be combined and situated in such a way as to more fully reconnect the neighborhoods with local parks and recreation elements in the area. This specifically may include lidding in between the two roadway crossings to provide an appropriate pedestrian crossing from the south side (Clyde Hill side) of the expanded roadway to Wetherill Nature Preserve. This would provide pedestrian access from the points to the south separate from the two vehicular crossings of the highway.

We see this as a potential opportunity to provide pedestrian access and recreation access to the parks and nature preserves associated with the Lake Washington wetlands for people coming down from Clyde Hill, Medina and the south portion of Yarrow Point. In addition, it offers the opportunity to link to regional trails within the Clyde Hill area and promote non-motorized access even to the downtown Bellevue area.

We ask that the three jurisdictions be solicited to discuss the disposition of the two 500 foot lids associate with 92nd Avenue and 84th Avenue, and identify an appropriate site for this crossing consistent with our respective Comprehensive Plans.

Traffic Impacts

L-015-004

Finally, we are concerned with the degradation of circulation into the Town of Yarrow Point from analysis of traffic impacts at offramps in our area. Exhibit 7-6. page 7-9, we believe, is confusing, and perhaps inaccurate, in that it suggests that the last off-ramp east of the floating bridge (92nd Avenue NE) could degrade to an "F" condition if the 4-lane option were implemented, or to an "E" condition should the 6-lane option become the preferred option for construction of the highway. We would ask that assistance be provided to the Town of Yarrow Point to understand the reason for this degradation and that mitigation be provided in the form of traffic management, lane size or alignment to ease this potential future condition.

Thank you for the opportunity to respond to this DEIS and we look forward to further discussions with WSDOT after the preferred alternative is determined.

Sincerely,

David Cooper, Mayor
Town of Yarrow Point.

City of Bothell

October 26, 2006

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

Dear Mr. Krueger:

L-016-001 The replacement of the State Route 520 floating bridge is a project of regional importance and will impact the travel patterns on the north end of Lake Washington positively and negatively. The impacts may be positive once the project is completed, depending on the level of tolls placed on the new bridge, and certainly negative during the construction period, specifically to State Route 522 as a significant increase in traffic volumes will be experienced.

For example, the intersection of State Route 522 and State Route 527 is currently operating at capacity several hours per day. In order to minimize the impact of the State Route 520 project in this area, the improvement projects slated for State Route 522 must be completed before the State Route 520 Bridge work begins. This request is in-line with the current acceleration of capacity improvements to I-405 in anticipation of traffic diverting to I-405 from I-5, when the Alaskan Way Viaduct is reconstructed.

L-016-002 The discussions in the State Route 520 Bridge Replacement Draft Environmental Impact Statement indicate that due to the increased traffic congestion on State Route 520, this will lead traffic to look for alternate routes, including State Route 522. The addition of tolls to State Route 520 will only increase the number of vehicles looking for alternate routes such as the over burdened State Route 522. The Cities of Bothell, Kenmore, Lake Forest Park, and Woodinville are concerned that the use of tolling to manage traffic during non-peak hours will increase traffic on SR-522 where congestion may be less during these times.

L-016-003 Redirecting traffic currently using State Route 520 to other routes would create crippling disruptions of regional traffic, which includes State Route 522, unless improvements are undertaken to maximize the capacity of those corridors now.

As the State Route 520 construction time frame is estimated to be 7 to 8 years, maintaining two lanes in each direction for thru traffic capacity will still be affected by

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L-016-003

the construction activity resulting in motorists seeking alternate routes. It is estimated in the EIS document that the westbound HOV lane will be closed for two years. This change will negatively affect the capacity of State Route 520, resulting in motorists using State Route 522 as an alternate route.

With the exception of the South Access project for the University of Washington Bothell/Cascadia Community College Campus, improvements to the State Route 522 corridor that have already been made or scheduled for completion in the next two years have been funded by federal funds and significant contributions by Sound Transit and King County METRO Transit, not state dollars.

The Cities of Bothell, Kenmore, Lake Forest Park, and Woodinville are requesting the State to provide adequate funding to complete the necessary projects in the State Route 522 corridor to ensure the impacts of traffic diverted as result of the State Route 520 Bridge Replacement Project have been minimized to the greatest extent possible.

The State Route 522 projects include:

- Realignment of the State Route 522 / State Route 527 intersection
- Completion of the widening of State Route 522 in the corridor
- Improvements to the State Route 522 / Kaysner Way intersection

These improvements will not only increase the vehicle capacity of the corridor but will provide for transit service to be a more viable alternative in this corridor.

We request that funding be provided now to complete additional studies to determine the appropriate mitigation in the State Route 522 corridor to address the expected negative impacts.

Sincerely,

Mark Lamb
Mayor, City of Bothell

Sincerely,

Randy Eastwood
Mayor, City of Kenmore

Sincerely,

David R. Hutchinson
Mayor, City of Lake Forest Park

Sincerely,

Cathy VonWald
Mayor, City of Woodinville

cc: Governor Christine Gregoire
Senator Rosemary McAuliffe
Representative Mark Ericks
Representative Al O'Brien
King County Executive Ron Sims
King County Councilmember Bob Ferguson
City of Kenmore
City of Lake Forest Park
WSDOT, Regional Administrator, Lena Eng
WSDOT, Sec. of Transportation. Douglas McDonald
RTID Chair Shawn Bunney
King County Metro Transit
Community Transit
Sound Transit

Port of Seattle

Monday, October 30, 2006

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

Attn: Paul Krueger, Environmental Manager

RE: Comments on the SR 520 Bridge Replacement and HOV Project

Dear Paul,

L-017-001

Thank you for the opportunity to comment on the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement (DEIS). The Port of Seattle, which operates the Seattle Seaport and the Sea-Tac International Airport, supports regional transportation projects which help move people and goods efficiently throughout the region. The Port's major interest in the SR 520 project is that freight movement, including trucks with hazardous and flammable loads, are not compromised or restricted on the new facility. The current Port understanding is that hazardous and flammable loads will be allowed with all SR 520 options, including any tunnel or lidded sections of the roadway. The Port would like to see the DEIS address the issue of hazardous and flammable loads and affirm that they will be accommodated.

L-017-002

Interstate 90, not SR 520, is the major east/west freight route between Seattle and the East Side. However, many trucks do use SR 520 to distribute goods and services and that will likely increase in the future. The Port would like to see freight addressed in the SR 520 DEIS in a similar way that other modes were addressed, including bus transit, light rail, bicycle and pedestrian traffic and parking. The DEIS should address specific issues important to freight movement including roadway grades (as low as possible), and vertical heights as high as possible for overhead structures (18' for oversize loads). The Port believes that freight movement should be a major element of major roadway environmental reviews because it is such an important element to the region's economic success.

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L-017-002

WSDOT is currently planning the I-90 Two-Way Transit and HOV Operations Project and that project has considered restrictions of hazardous and flammable loads through Seattle and Mercer Island tunnels on I-90. There currently are no restrictions on I-90 and the Port would encourage WSDOT to look at the freight system holistically and not redirect freight traffic.

Again, thank you for the opportunity to comment on the SR 520 Bridge Replacement and HOV Project DEIS. The Port supports this work and strongly encourages WSDOT to adopt a preferred alternative that accommodates freight movements along with other modes of transportation.

If you have any questions, please contact me at 206-728-3832 or Project Planner Dan Burke at 206-728-3376.

Sincerely,

John Okamoto
Chief Administrative Officer
Port of Seattle

KENMORE BY THE LAKE

The City Of Kenmore

P.O. Box 82607 • Kenmore, Washington 98028-0607

October 31, 2006

Mr. Paul Krueger
WSDOT Environmental Manager
414 Olive Way, Suite 400
Seattle, Washington 98101

Re: SR520 Draft Environmental Impact Statement

Dear Mr. Krueger:

L-018-001

The City of Kenmore is very concerned about the impacts to SR 522 during construction of a new SR 520 bridge and the proposed tolls after construction.

The City of Kenmore has been working very hard, since incorporation, to improve operations of SR 522 through our community and secure the funding necessary to implement those plans. To date, we have amassed nearly $50 million dollars; a significant effort for a relatively new, small city to accomplish, especially to correct a problem not of our making, on a WSDOT route of State Wide Significance.

Even with our investment, our traffic model shows that all Kenmore intersections with SR 522 will fail (83rd Place NE, 80th Avenue NE, 73rd Avenue NE, 68th Avenue NE, and 61st Avenue NE). If the tolling study is correct and we experience an additional 3% - 15% growth in traffic as a result of the toll on SR 520, the current and growing problem will only be exacerbated.

To date, Kenmore has worked in partnership with WSDOT, Sound Transit, King County, PSRC and TIB to develop a working plan to help address the operational and safety issues on this important corridor. We feel like we have taken a leadership role and have accomplished much for such a new community. The draft EIS fails to properly address the impacts of the additional traffic on SR 522 during both construction and implementation of tolls on the SR 520 bridge. The City is requesting that the State propose mitigation for these traffic impacts to SR 522.

Thank you for this opportunity to review and comment on the draft EIS and we look forward to continuing our partnership toward solving this mutual problem.

Sincerely,

Stephen L. Anderson
City Manager

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Email: cityhall@ci.kenmore.wa.us. website: www.cityofkenmore.com

Town Of Yarrow Point

City of Clyde Hill – Town of Yarrow Point – Town of Hunts Point – City of Medina

September 6, 2006

L-019-001 The cities and towns, known as the Points Communities, are directly impacted by the decisions relating to the SR-520 Bridge Replacement and HOV Project. We have been active participants throughout the decade-long discussions and want to clearly communicate our positions and encourage other stakeholders to support compatible project recommendations. The positions below reflect the project recommendations of the Clyde Hill City Council, Hunts Point Town Council, Medina City Council and Yarrow Point Town Council.

As the chief elected officials of our communities and members of the SR-520 Bridge Replacement and HOV Project Executive Committee, we have a vested interest in this project as well as an obligation to protect our neighborhoods and the environment by ensuring that the project includes appropriate mitigation. Our project recommendations have been developed over the course of several years as a result of citizen input, active participation at all levels of the planning process and ongoing discussions with SR-520 Project Staff.

We believe that our project recommendations are consistent with the goals of the SR-520 Bridge Replacement and HOV Project, which were developed by the Trans-Lake Washington Study Committee and adopted by the co-lead agencies and all the project's committees:

- Improve safety and reliability
- Increase mobility for people and goods
- Avoid, minimize, and/or mitigate the project effects on neighborhoods and the environment

Your support for a project recommendation that is compatible with the Points Cities and Towns Project Recommendation is strongly encouraged.

Respectfully,

Miles Adam
Mayor
City of Medina

David Cooper
Mayor
Town of Yarrow Point

George Martin
Mayor
City of Clyde Hill

Fred McConkey
Mayor
Town of Hunts Point

Preferred Project Alternative & Acceptable Options

Our Cities and Towns are in support of the following project and project options

6 Lane Alternative (two general purpose lanes plus an HOV lane in each direction)
- Construct project with pontoons sized to carry future high-capacity transit

Place the eastside bicycle/pedestrian path to the north of the highway

Retain the Evergreen Point freeway transit stop…Do not eliminate this stop

Provide direct transit access at 108th Ave NE to the S. Kirkland Park and Ride

STATE ROUTE 520

SR 520 Bridge Replacement and HOV Project

COMMENT FORM

Last Name: Seyed Safavian Additional Sheet:
Zip Code: 98011 Page 1 of 1

September 21, 2006 Draft EIS Public Hearings

L-020-001 As the representative of the City of Bothell, I like to receive information regarding potential Mitigation of the proposed project on the SR-522 Corridor.

It is well documented that both improvement as well as tolling of SR-520 would have adverse impacts including traffic diversion and noise pollution on the SR-522. There must be a clear plan to address this issue as well as Committment of funds to take care of appropriate Mitigations.

Seyed Safavian
tel (425) 486-2768
City of Bothell Transportation Manager

Washington State Department of Transportation
SOUNDTRANSIT
U.S. Department of Transportation Federal Highway Administration