



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.

MOBILITY FOR THE REGION

L-009-001
Comment Summary:
 6-Lane Alternative

Response:
 See Section 1.2 of the 2006 Draft EIS Comment Response Report.

L-009-002
Comment Summary:
 Format and Content

Response:
 See Section 23.1 of the 2006 Draft EIS Comment Response Report.

L-009-003
Comment Summary:
 Freeway Operations (I-5 Area)

Response:
 See Section 5.2 of the 2006 Draft EIS Comment Response Report.

- 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-009-004

Comment Summary:

Pacific Street Interchange Option

Response:

See Section 1.2 of the 2006 Draft EIS Comment Response Report.

L-009-005

Comment Summary:

Montlake Freeway Transit Station

Response:

See Section 2.1 of the 2006 Draft EIS Comment Response Report.

L-009-006

Comment Summary:

North of Montlake Cut

Response:

See Section 2.1 of the 2006 Draft EIS Comment Response Report.

L-009-007

Comment Summary:

Eastside Concerns

Response:

See Section 24.0 of the 2006 Draft EIS Comment Response Report.

L-009-008

Comment Summary:

Montlake Freeway Transit Station

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

Response:

See Section 2.1 of the 2006 Draft EIS Comment Response Report.

L-009-009

Comment Summary:

Traffic Management (Construction)

Response:

See Section 4.2 of the 2006 Draft EIS Comment Response Report.

L-009-010

Comment Summary:

Traffic Management (Construction)

Response:

See Section 4.2 of the 2006 Draft EIS Comment Response Report.

L-009-011

Comment Summary:

Tolling Scenarios, Pricing, and Revenue

Response:

See Section 3.3 of the 2006 Draft EIS Comment Response Report.

L-009-012

Comment Summary:

Format and Content

Response:

See Section 23.1 of the 2006 Draft EIS Comment Response Report.

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-009-013

Comment Summary:

Regional Land Use and Transportation Planning

Response:

See Section 2.1 of the 2006 Draft EIS Comment Response Report.

L-009-014

Comment Summary:

Methodology (Freeway)

Response:

See Section 5.1 of the 2006 Draft EIS Comment Response Report.

L-009-015

Comment Summary:

Eastside Concerns

Response:

See Section 24.0 of the 2006 Draft EIS Comment Response Report.

L-009-016

Comment Summary:

Freeway Operations (I-5 Area)

Response:

See Section 5.2 of the 2006 Draft EIS Comment Response Report.

L-009-017

Comment Summary:

Pacific Street Interchange Option

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

Response:

See Section 1.2 of the 2006 Draft EIS Comment Response Report.

L-009-018

Comment Summary:

Montlake Freeway Transit Station

Response:

See Section 2.1 of the 2006 Draft EIS Comment Response Report.

L-009-019

Comment Summary:

North of Montlake Cut

Response:

See Section 2.1 of the 2006 Draft EIS Comment Response Report.

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
Comment Summary:
Eastside Concerns

Response:
See Section 24.0 of the 2006 Draft EIS Comment Response Report.

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

Comment Summary:

Traffic Management (Construction)

Response:

See Section 4.2 of the 2006 Draft EIS Comment Response Report.

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
Comment Summary:
Traffic Management (Construction)

Response:
See Section 4.2 of the 2006 Draft EIS Comment Response Report.

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

Comment Summary:

Tolling Scenarios, Pricing, and Revenue

Response:

See Section 3.3 of the 2006 Draft EIS Comment Response Report.

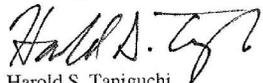
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L-009-023 | and for cross-lake transit service. The final EIS should assess the impacts and potential benefits of tolling both facilities.

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

L-009-024

Comment Summary:

Tolling Technology and Infrastructure

Response:

See Section 3.3 of the 2006 Draft EIS Comment Response Report.