

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

---

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

- C-021-001** | Format. While the EIS itself is attractively designed, we regret that there is inadequate integration between it and the various appendices that contain much of the data and analysis. The EIS text is often too general to be useful, with the actual data and analysis buried in the appendices. The appendices often include updates that are poorly integrated with the material that precedes them, making it unnecessarily difficult to obtain the overall picture.
- C-021-002** | Global warming impacts are not adequately assessed. Increasing the number of SR520 bridge traffic lanes will cause more driving, and hence produce more greenhouse gases. Keeping SR520 at four lanes is the most important single step that our region can take to reduce its future impact on global warming.
- C-021-003** | Construction-related traffic is not adequately analyzed and disclosed. SR520 construction will cause huge impacts from truck noise, vibration, dust and pollution, and traffic safety and tie-ups--and building the six-lane alternatives (especially the Pacific Street Interchange) will cause at least a year more of these impacts than the four-lane alternative. There will be tens of thousands of additional trips by fully laden dump trucks, concrete trucks, and other heavy vehicles on City streets. The EIS must provide quantitative measures for this expected truck traffic and its impacts.
- C-021-004** | The more comprehensive noise analysis that is needed will show that the six-lane alternatives have noise impacts that are unacceptable yet cannot be mitigated. A full comparison of the noise impacts of the six-lane alternatives versus the four-lane alternative will show that the six lane alternatives cause more 66+ dBA noise above the first floor than the four-lane alternative. Also, for noise impacts that remain under 66 decibels but are still disturbing to the average resident or business, the six-lane alternatives will cause more noise

**C-021-001**  
**Comment Summary:**  
Format and Content

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

**C-021-002**  
**Comment Summary:**  
Energy and Greenhouse Gases

**Response:**  
See Section 14.0 of the 2006 Draft EIS Comment Response Report.

**C-021-003**  
**Comment Summary:**  
Schedule

**Response:**  
See Section 4.1 of the 2006 Draft EIS Comment Response Report.

**C-021-004**  
**Comment Summary:**  
Noise (Methodology)

**Response:**  
See Section 12.1 of the 2006 Draft EIS Comment Response Report.

- C-021-004** | increases for more people than the four-lane alternatives. The higher noise from the six-lane alternative than the four-lane alternative will be felt by all neighborhoods that now experience noise from SR520, including not only Montlake, Portage Bay/Roanoke Park, Capitol Hill and Eastlake, but also Madison Park, Laurelhurst, and the Eastside neighborhoods.
- C-021-005** | The EIS fails to acknowledge that expanding SR520 to six lanes by adding two HOV/transit lanes will increase single occupancy vehicle traffic. The six-lane alternatives would in fact increase single-occupancy vehicle traffic. Because the car-pools and buses that move to the newly built HOV lanes would free up room on the existing lanes, which would be filled by single occupancy vehicles. For a systematic argument that building new HOV lanes encourages single occupancy driving, undermines transit, and harms the environment, see the report on Rethinking HOV which is included in the section, "Building HOV Lanes Doesn't Work," of our web site, [www.noexpansionofSR520.org](http://www.noexpansionofSR520.org). We do not help transit by making it easier to drive alone, as the six-lane alternative would do.
- C-021-006** | Whereas WSDOT's EIS shows the six-lane alternatives with lids at Montlake and Roanoke, the four-lane alternative is shown without these lids, and hence the EIS erroneously claims that four lanes are noisier than six. The EIS did not respond adequately to the City of Seattle's request in resolution 30777 that WSDOT "pursue all possible measures that promote neighborhood livability with the 4-lane option under study by WSDOT as well as the 6-lane option." It would be entirely feasible to put these same lids on the four-lane alternative, but unfortunately the EIS does not do so. The EIS should re-analyze the four-lane alternative with the lids, because to do so would likely show that its noise impacts would be lower than for any of the six-lane alternatives.
- C-021-007** | The EIS does not respond to the City of Seattle's request in resolution 30777 that WSDOT "develop policies that prevent the conversion of HOV lanes and rapid transit lanes to general purpose traffic," and that it "design safety shoulders so that future conversion to traffic lanes is not feasible." Throughout the country, HOV and transit lanes have, once built (and sometimes even on the day they opened) been converted to general purpose lanes; and highway shoulders have been converted to traffic lanes (east of the Lake, the SR520 shoulders have for years been used as HOV lanes, and now the I-90 bridge will be restriped to convert shoulders to create two additional traffic lanes). Without measures to prevent such conversions, the SR520 traffic models and the environmental analysis that depend on them are not worth the paper they are written on, because once built, SR520 is likely to have much more general purpose traffic than was promised in the EIS.

#### **C-021-005**

##### **Comment Summary:**

Methodology (Freeway)

##### **Response:**

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

#### **C-021-006**

##### **Comment Summary:**

4-Lane Alternative

##### **Response:**

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

#### **C-021-007**

##### **Comment Summary:**

Regional Land Use and Transportation Planning

##### **Response:**

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

- C-021-008** | The EIS noise analysis is seriously misleading in claiming that noise impacts would be reduced under all the build alternatives, because it focuses on a relatively few specific locations that happen to now exceed 66 dBA. As one of many examples, see the statement on page 5-19 that "The noise situation would improve substantially if either of the build alternatives were built." A more accurate statement would be that "Noise walls will reduce noise somewhat for most locations with current noise levels in excess of 66 dBA, but over a much wider area, most locations whose current noise levels are beneath this threshold will experience higher noise levels, but less so for the four-lane alternative than the six-lane alternatives."  
from New York City
- C-021-009** | As a SEPA document, this EIS should consider a broader range of noise impacts than just a threshold of 66 dBA at the first floor. The State Environmental Policy Act requires assessment of a broad range of environmental impacts, and as a SEPA document, this EIS is not bound to study only noise impacts that can be legally mitigated by federal funds. Many homes and businesses will suffer noise levels in excess of 66 dBA noise levels on upper floors. Many others will experience an increase in noise, even if the increase does not reach the 66 dBA level. Because federal noise mitigation funds are not allowed to be spent for interior residential or office uses above the first floor, or for noise below 66 dBA, it is all the more important to consider the full noise impacts of the various alternatives, because each alternative brings with it a certain level of noise that, because of the federal restrictions, cannot be easily mitigated.
- C-021-010** | The EIS fails to propose a "congestion pricing" cross-lake toll level that ensures free flow at rush hour for the four-lane alternative. A rush-hour toll on both the SR-520 and I-90 bridges would manage congestion very well, as has been shown by studies already conducted by WSDOT and the Puget Sound Regional Council; the Mayors "green ribbon" commission also recently urged such "congestion pricing." Yet the EIS fails to study a scenario in which there would be tolls on both the SR520 and I-90 bridges. Because the EIS assumes a toll only on the SR520 bridge, the claim is that I-5 would become clogged as drivers take the free I-90 crossing, and therefore the SR520 four-lane alternative cannot work. But the Federal Highway Administration already recognizes SR-520 and I-90 as jointly constituting a single corridor, and for the purpose of analyzing SR-520 tolls, the EIS should have done so as well. When the SR520 EIS studies the four-lane alternative with congestion pricing tools on both SR-520 and I-90, it will show it to be free-flowing.
- C-021-011** | The EIS analysis of the two tolling alternatives does not articulate their dramatically contrasting implications for transportation planning. The alternative

#### **C-021-008**

##### **Comment Summary:**

Noise (Methodology)

##### **Response:**

See Section 12.1 of the 2006 Draft EIS Comment Response Report.

#### **C-021-009**

##### **Comment Summary:**

Noise (Methodology)

##### **Response:**

See Section 12.1 of the 2006 Draft EIS Comment Response Report.

#### **C-021-010**

##### **Comment Summary:**

Tolling Scenarios, Pricing, and Revenue

##### **Response:**

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

#### **C-021-011**

##### **Comment Summary:**

Tolling Scenarios, Pricing, and Revenue

##### **Response:**

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

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

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

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

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

#### **C-021-012**

##### **Comment Summary:**

Pacific Street Interchange Option

##### **Response:**

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

#### **C-021-013**

##### **Comment Summary:**

Noise (Methodology)

##### **Response:**

See Section 12.1 of the 2006 Draft EIS Comment Response Report.

#### **C-021-014**

##### **Comment Summary:**

Project Costs

##### **Response:**

See Section 3.1 of the 2006 Draft EIS Comment Response Report.

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

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

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

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

#### **C-021-015**

##### **Comment Summary:**

6-Lane Alternative

##### **Response:**

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

#### **C-021-016**

##### **Comment Summary:**

Regional Land Use and Transportation Planning

##### **Response:**

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

#### **C-021-017**

##### **Comment Summary:**

4-Lane Alternative

##### **Response:**

See Section 2.0 of the 2006 Draft EIS Comment Response Report.

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

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

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

Sincerely,

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

### **C-021-018**

#### **Comment Summary:**

Regional Land Use and Transportation Planning

#### **Response:**

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

### **C-021-019**

#### **Comment Summary:**

Noise (Methodology)

#### **Response:**

See Section 12.1 of the 2006 Draft EIS Comment Response Report.