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**To:** [SR 520 DEIS Comments:](#)  
**CC:**  
**Subject:** Federal Transit Administration Comment Letter  
**Date:** Tuesday, October 31, 2006 4:32:35 PM  
**Attachments:** [WA WSDOT SR 520 DEIS Comments 10-31-06.pdf](#)

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Dear Mr. Krueger:

Attached please find FTA's comments on the project.

Thank you for considering them.

Sincerely,

Dan Drais

Daniel G. Drais  
Environmental Manager  
Federal Transit Administration  
206-220-7954  
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October 31, 2006

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

**Re: Federal Transit Administration Comments Regarding  
SR 520 Bridge Replacement and HOV Project Draft Environmental Impact  
Statement**

Dear Mr. Krueger:

Thank you for the opportunity to review and comment on the Washington State Dept. of Transportation (WSDOT) Draft Environmental Impact Statement for the SR 520 Bridge Replacement and HOV Project. One of the greatest challenges facing our region, the replacement of this vital facility epitomizes the ongoing conflicts between some of the fundamental values of our community: community cohesion and neighborhood quality of life, transportation efficiency, significant parks and open space, historic and cultural resources, dwindling high-value aquatic and terrestrial habitat, and safety, to name a few.

We appreciate the difficulty of your team's task, and hope that our comments will be useful.

**Overall comments about the alternatives**

**F-004-001**

The Federal Transit Administration generally prefers increased system efficiency to improvements that solely benefit general purpose traffic. FTA also favors capital projects that create or improve mobility options for travelers instead of adding general-purpose lanes that will inevitably become congested. We believe that a continuous HOV lane across the lake will be critical to meeting the increased demand for reliable transit services in this corridor.

**F-004-002**

We are similarly interested in further refinement of the Pacific Street Interchange option because of the potential transit benefits it provides. We have grave concerns, however, about the impacts and the degree to which they can be mitigated. These include the construction and design impacts around Husky Stadium, the University Link station, and

**F-004-001**

**Comment Summary:**

Regional Land Use and Transportation Planning

**Response:**

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

**F-004-002**

**Comment Summary:**

Pacific Street Interchange Option

**Response:**

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

F-004-002

the Pacific Street Transfer Station; the impacts associated with closing the Montlake Freeway Station; and the environmental impacts associated with construction of a new freeway bridge over Marsh Island and Union Bay.

F-004-003

With respect to the Eastside, we believe either improvement to the South Kirkland Park-and-Ride would improve reliability and reduce travel time. We also favor the better Eastside-Seattle bike connection created by the Bike/Pedestrian Path to the North option.

F-004-004

We have serious concerns about the removal of the Evergreen Point Freeway Transit Stop. If that option becomes part of the preferred alternative, FTA expects substantially more detail about how to mitigate the impact to bus riders.

F-004-005

**Discussion of cumulative impacts**

We do not believe that the analysis or discussion of cumulative impacts is adequate. While in most cases the DEIS mentioned the possibility of cumulative impacts, we believe it downplayed the likely intensity and duration of those cumulative impacts. Disruption and delays to "traffic," of course, mean disruption and delay to transit service. At a time when transit will be urgently needed to help commuters deal with changes and/or barriers to their regular commutes, the project proponents must recognize and adequately mitigate the short-term impacts that might otherwise render transit ineffectual.

F-004-006

- a. The discussion of cumulative construction impacts from Sound Transit's (ST) University Link project is too cursory. Regarding *construction* conflicts, the DEIS suggests that construction of the SR 520 project would last 7 to 8 years (p. 8-1). WSDOT materials at open houses suggest construction will begin in 2009. The DEIS correctly observes that the ST work is likely to extend from late 2008 through 2013 or 2014, making construction conflicts a certainty (especially under the Pacific Street Interchange option, but also under others). The discussion of cumulative construction impacts on pages 9-6 and 9-7 and elsewhere in the DEIS should receive more prominence in the FEIS, and the probability of overlapping construction should be highlighted rather than downplayed. We also expect to see a robust, detailed mitigation plan, developed in collaboration with the appropriate transit agencies, as part of the FEIS in the event the Pacific Street Interchange option advances as the Preferred Alternative.

F-004-007

- b. With respect to *design* conflicts, the University Link project has already received its federal NEPA Record of Decision and is about to begin final design. Sound Transit has funding identified and secured for University Link project execution. Should the SR 520 project timeline slip due to funding or other reasons, the University Link station will be well underway or completed by the time the SR 520 project begins construction and unlikely to be in a position to "design around" conflicts with SR 520. FTA believes that the potential design conflicts in this scenario deserve more attention than they have

**F-004-003**

**Comment Summary:**

Eastside Concerns

**Response:**

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

**F-004-004**

**Comment Summary:**

Eastside Concerns

**Response:**

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

**F-004-005**

**Comment Summary:**

Indirect and Cumulative Effects Methods of Analysis

**Response:**

See Section 20.1 of the 2006 Draft EIS Comment Response Report.

**F-004-006**

**Comment Summary:**

Indirect and Cumulative Effects (Construction)

**Response:**

See Section 20.2 of the 2006 Draft EIS Comment Response Report.

**F-004-007**

**Comment Summary:**

Indirect and Cumulative Effects (Construction)

- F-004-007** | received in the DEIS. With respect to both construction and design conflicts, FTA expects that WSDOT would need to budget appropriate funding to mitigate the impacts to the light rail station.
- F-004-008** | c. The cumulative impacts section should not have omitted WSDOT's planned improvements to the I-5 corridor:
- WSDOT is developing a plan to reconstruct and rehabilitate the 40-year-old concrete pavement on I-5 from Boeing Access Road to Northgate. As part of his effort, WSDOT is also examining possible operational improvements to I-5 from I-405 in Tukwila to I-405 in Lynnwood. Improvements may include removing and replacing the existing concrete pavement, reinforcing joints, improving lane continuity at bottleneck locations, and shifting left on- and off-ramps to the right side of the roadway. The plan and schedule are expected to be completed by the summer of 2007. (Alaska Way Viaduct Supplemental Draft EIS (July 2006), p. 112.)
- F-004-009** | d. The cumulative impacts section should have highlighted the University of Washington Medical Center's plans to begin construction on an additional 260,000 square feet of space in 2008, and the likely challenges and conflicts presented by that project.
- F-004-010** | e. With respect to all of the concurrent construction projects, the section appears to hide behind timing uncertainties: "...if the work took place during the construction of other planned projects... the **exact timing** is of these construction projects is not known...if two or more were built at the same time... the potential for cumulative effects would be greatest **if** the Pacific Street Interchange option were built at the same time [as University Link]...Depending upon timing..." (pp. 9-5 to 9-7, emphasis added). In fact, it is virtually certain that the UWMC project, the University Link project, the I-405 project, the I-5 project, and the Alaskan Way Viaduct project will all overlap significantly with the SR 520 project. The document should not understate the certainty of severe cumulative short-term impacts. We believe the combination of construction work closing parallel portions of SR 99, I-405, and I-5, even without the University Link and University of Washington construction, should be more prominently discussed. Again, we hope a robust and detailed approach to mitigation, including actual mitigation measures, will be published before or coincident with the FEIS.
- F-004-011** | f. In analyzing potential cumulative impacts, the DEIS states, "Travel times are only one of several factors that play a large role in determining whether people will find an area desirable as a place to live or work, but they are the only factor we are able to model quantitatively" (p. 9-2). Were other factors examined qualitatively?

**Response:**

See Section 20.2 of the 2006 Draft EIS Comment Response Report.

**F-004-008**

**Comment Summary:**

Indirect and Cumulative Effects Methods of Analysis

**Response:**

See Section 20.1 of the 2006 Draft EIS Comment Response Report.

**F-004-009**

**Comment Summary:**

Indirect and Cumulative Effects Methods of Analysis

**Response:**

See Section 20.1 of the 2006 Draft EIS Comment Response Report.

**F-004-010**

**Comment Summary:**

Indirect and Cumulative Effects (Construction)

**Response:**

See Section 20.2 of the 2006 Draft EIS Comment Response Report.

**F-004-011**

**Comment Summary:**

Indirect and Cumulative Effects Methods of Analysis

**Response:**

See Section 20.1 of the 2006 Draft EIS Comment Response Report.

F-004-012

**Discussion of tradeoffs between the short-term uses of environmental resources and long-term gains (or productivity) from the project:**

The DEIS states, "The long-term cost of not replacing the bridge would be staggering: intolerable traffic congestion, regional economic losses, reduced quality of life in project area neighborhoods, and – most important of all – the ever-present likelihood that high winds or an earthquake could suddenly cripple the Portage Bay and/or Evergreen Point bridges." Page 9-10. FTA finds this misleading. The deteriorating bridges certainly cannot last much longer, and they must be replaced now. But none of the alternatives will allow the region to eliminate "intolerable traffic congestion"; at best, with wise investments, we can manage the congestion.

F-004-013

**Impacts to transit**

The need to close the westbound HOV lane east of Lake Washington for two years raises serious concerns. The shortages of roadway will heighten transit's utility during the construction period; obliterating transit's advantage during that period, as closing down the HOV lane will do, should be a last resort. The FEIS should provide greater detail about how it will mitigate this severe impact, and explain more clearly why there is no alternative to staging from this lane.

F-004-014

"Sound Transit, Metro Transit, and Seattle DOT have been involved in discussions with WSDOT throughout the development of the 6-Lane Alternative options; however, the project team understands that additional work will be required by all four agencies to determine how to address the travel needs of transit riders affected by the removal of the Montlake Freeway Station, if that option is chosen. While the new light rail service proposed by Sound Transit will meet some of this need, this restructuring of bus service is likely to result in additional costs for transit service providers" (4-13). This subject requires substantially more analysis and discussion in the FEIS. Some 30 bus routes use the Montlake Freeway Station.

The DEIS suggests that bus service removed from the Montlake Freeway Station as part of the Pacific Street Interchange option would all be simply transferred north to the Pacific Street Transit Center (p. 5-15) How would that affect transit times for riders coming from the south and going to the east side of Lake Washington, and east-west transfer connections? Riders currently board (or transfer) at the Montlake Freeway Station to go to downtown Seattle via SR 520 and I-5; how would those passengers be accommodated at the Pacific Street transfer station?

The DEIS identifies the construction of a parking structure as possible mitigation for impacts to University area parking supply (p. 5-17). FTA believes that it would be equally appropriate to identify the capital costs of acquiring new buses and bus facilities to mitigate for new transit service that would be required due to closure of the Montlake or Evergreen Freeway stops.

**F-004-012**

**Comment Summary:**  
Format and Content

**Response:**

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

**F-004-013**

**Comment Summary:**  
Traffic Management (Construction)

**Response:**

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

**F-004-014**

**Comment Summary:**  
Montlake Freeway Transit Station

**Response:**

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

**F-004-015** Will there be impacts to University of Washington and/or University of Washington Medical Center shuttle services under the Pacific Street Interchange option? Could UW or UWMC transit help mitigate impacts to the Pacific Street area?

Is the Pacific Street Transfer Point adequate to absorb the relocation of many of the 30 routes currently served by the Montlake Freeway Station? If not, does the Pacific Street Interchange option include an expanded area for bus service? Given the University Link ridership, Husky Stadium expansion, and UW Medical Center expansion, will there be physical space for an expanded transfer station?

**F-004-016** Construction of the SR-520-to-I-5 Express lane ramp appears to eliminate one of the four I-5 express lanes. Taking a lane from the I-5 express roadway would have a major impact on the many transit riders who use I-5 buses. Has the impact to transit operations on I-5 been evaluated?

**F-004-017** **Modeling/forecasting**

The number of peak period bus trips needed to meet the additional demand for transit in the project area would be 30 percent higher (4-Lane vs. No-Build). But for the 6-Lane alternative, the added demand is only 31 percent higher. (Page 5-15). Why does the 6-Lane option not generate significantly more transit demand than the 4-Lane option, given how much better transit should operate with a dedicated lane all the way through the project corridor?

In Chapter 4 generally, the shifting among different measures of traffic and transportation is occasionally confusing. One example: Exhibit 4-4 shows "Predicted change in SR 520 Afternoon Traffic" in percentages. The previous few pages have discussed "traffic" in terms of vehicle trips, person-trips, and travel time, and the previous exhibit divided "traffic" into person-trips and vehicle-trips. The text says Exhibit 4-4 shows "the amount of traffic," but what that means is unclear.

The use of peak-period *bidirectional* travel time is a little unusual. It necessarily understates the most aggravated conditions, always averaging them with the more favorable (or less bad) opposite direction. Why would that be useful? Why not use metrics like Table 7-12 in the Discipline Report (p. 7-17)? Qualitatively, what would the reader expect to see reflected in the bidirectional analysis that would not be as clear from a unidirectional analysis? What important information might be masked by using a bidirectional approach?

**F-004-018** The Technical Appendix Addendum appears to include HOV lanes as part of the Pacific Street Interchange (pp. 1-5, 7-1). The DEIS says that no HOV lane is included (p. 3-25). Did the modeling assume HOV ramps?

**F-004-015**

**Comment Summary:**

Pacific Street Interchange Option

**Response:**

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

**F-004-016**

**Comment Summary:**

Freeway Operations (I-5 Area)

**Response:**

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

**F-004-017**

**Comment Summary:**

Methodology (Freeway)

**Response:**

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

**F-004-018**

**Comment Summary:**

Pacific Street Interchange Option

**Response:**

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

**F-004-019** DEIS traffic modeling assumes that 30 percent more transit service would be provided in 2030 than is provided today, enough to satisfy the increased demand in the project year. "If the demand is not met, volumes and travel times could change from those described in the traffic analyses... This increased level of service is not currently planned or funded" (p. 5-15). Given that the increased transit service is a fundamental assumption behind the DEIS's presentation of corridor capacity, FTA believes the capital and operating cost of providing this level of service should be included in the project cost estimates. FTA also requests an indication of whether area transit providers agree with the estimate, and whether they are committed to meeting it.

**F-004-020** The Alaska Way Viaduct DEIS relied upon Puget Sound Regional Council data in developing its traffic model. It then discovered that for some reason the predicted increase it found in transit ridership was not credible. It is now re-running the model with different assumptions. The SR 520 DEIS also predicts large increases in transit ridership. For example, even under the No-Build Alternative, more than twice as many people (25 percent vs. 11 percent) will use transit to cross the lake as today, in addition to 9 percent carpooling (p. 4-2); under the 6-Lane Alternative, 30,000 more people will cross the lake using only three percent more cars (p.4-5). Similarly, the number of daily person-trips by carpools jumps from about 11,000 under the No-Build scenario to almost 56,000 under the 6-Lane Alternative (p. 4-12). Is the project team confident that its mode-split forecasting is reliable?

**F-004-021** **Other issues**  
"Full closure is evaluated here as a 'worst-case' scenario, consistent with the intent of NEPA." P. 4-16. NEPA does not require evaluation of a worst-case scenario.

**F-004-022** The project proposes no direct multi-modal connections (park-and-rides or drop-off points) with the University Link station (p. 4-13). Would not such connections be both natural and beneficial?

**F-004-023** In discussing the impacts of a toll, the DEIS states, "[T]here are several viable choices for avoiding the toll entirely, including riding in a bus or taking an alternative route around the lake" (p. 4-35). FTA believes the mitigation measures on p. 4-36 are far more likely to be "viable" than "taking an alternative route around the lake."

\* \* \*

**F-004-019**  
**Comment Summary:**  
Project Costs

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

**F-004-020**  
**Comment Summary:**  
Methodology (Freeway)

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

**F-004-021**  
**Comment Summary:**  
Format and Content

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

**F-004-022**  
**Comment Summary:**  
North of Montlake Cut

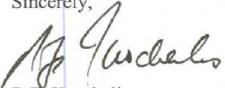
**Response:**  
See Section 2.1 of the 2006 Draft EIS Comment Response Report.

**F-004-023**  
**Comment Summary:**  
Environmental Justice

FTA Comments  
SR 520 Project  
October 31, 2006

Again, we appreciate your team's work on this challenging project and hope our comments are helpful.

Sincerely,



R.F. Krochalis  
Regional Administrator

cc: Kevin Desmond, King County Metro  
Bob Drewel, Puget Sound Regional Council  
Judy Giniger, WSDOT

**Response:**

Please see Section 8.1 of the Draft EIS Comment Response Report.