



Seattle Yacht Club

Established in 1892

Received

AUG 01 2011

SR520 Document Control

Margaret Kucharski,
Environmental Lead SR 520 Program
Washington State Department of Transportation
600 Stewart Street, Suite 520
Seattle, WA 98101

Re: SR 520 FEIS

Dear Ms. Kucharski,

This letter presents Seattle Yacht Club's (SYC) formal response and comments on the Final Environmental Impact Statement (FEIS) issued on June 09, 2011 regarding the SR 520, I-5 to Medina Bridge Replacement and HOV Project (Project). We have reviewed the document closely and believe the proposed project will have direct and indirect impacts on the SYC both during and after construction.

The SYC, a not-for-profit Washington corporation formed in 1909, owns and operates a historically designated clubhouse and marina located in Seattle's historic Montlake neighborhood. The SYC clubhouse, marina, and grounds are listed in the National Register of Historic Places (NRHP). The SYC property is located within the Area of Potential Effect (APE) on Portage Bay and is immediately adjacent to that section of SR 520 that is referred to in the FEIS as the Portage Bay Bridge (Bridge). In addition to our concerns over the impacts to our building and grounds, we are particularly concerned about the impacts to Portage Bay, an area of traditional significance to the members of our Club, and to the integrity of the adjacent historic Montlake neighborhood.

SYC does not object to the rebuilding of SR 520 between I-5 in Seattle and the Lake Washington community of Medina. Representatives of the Club have engaged in constructive discussions with the Washington Department of Transportation (WSDOT) and its Montlake neighbors about the Project for over a decade, including participating as a consulting party to the Section 106 process and in the development of mitigation measures for impacts to historic properties from the Project. As a commitment to the process, the SYC signed the programmatic agreement (PA) developed by WSDOT and the Federal Highway Administration (FHWA). However, we wish to go on record regarding areas where we believe the FEIS has not adequately stated the impacts of the Project. Additionally, we believe that despite the provisions in the PA, there will be impacts on our historic property and operations. Some of SYC's concerns include:

- Impacts during construction, including limitations of access to the Club via water and land, increased dirt, air pollution, noise, etc.

- The proposed widening and relocation to the north of the existing bridge.
- Environmental degradation such as air and water pollution and noise, among others.
- The impact of tolling on our members' and guests' access to our facilities and adjacent recreational waterfront.
- Degraded north/south travel times from north Capital Hill to Seattle Children's Hospital will inhibit our members' and guests' access to our facility through added congestion of this corridor.
- Interference with SYC traditional cultural activities at our Portage Bay property and adjacent waters.
- The cumulative impacts that degrade our facility such that our membership and revenues from rentals will be reduced.

We would also like to go on record indicating several specific areas where the SYC believes the analysis in the FEIS is lacking. These issues are described in detail below.

Bridge Footprint

The FEIS does not include any GPS coordinates or other specific markers that allow the project's proposed locations to be determined. However, all of the proposed options provide for a wider, higher and more northerly positioned bridge carrying more traffic. Each of these elements of the new bridge will increase the air pollution and visual impacts on our property. Despite the provisions for installing sound walls to lower noise levels, we also believe there will be significant impacts from noise on the use of our facilities and Portage Bay for outdoor activities. The Bridge, as shown in drawings in the FEIS, Exhibit 5-6-4 on page 5-6-8 also appears to come within portions of Portage Bay used for Opening Day and our permanent moorage. This will impact our use of Portage Bay for important events and Club activities.

Recreation

Another significant shortcoming of the FEIS is the presentation of issues relating to recreation. The discussion of recreational use of the waterways is limited to the Private Recreational Boating Facilities in Portage Bay and does not mention the Montlake Cut, Arboretum waterways and Union Bay. These are vital and heavily used recreational areas for a host of activities including swimming, fishing, kayaking, canoeing, and rowing practices and races. Portage Bay is the central feature of the boating activities of rowing clubs, canoe and kayak rentals, at least three marinas, and the houseboats on the shores of Portage Bay and Lake Union. Although the SYC is specifically concerned about the impacts on our members and facilities, we believe the lack of consideration for the effects on the entire boating community is a significant oversight in disclosing the impacts of the project on the community.

Although the FEIS acknowledges on page 6-4-7 that "water access to the Seattle Yacht Club and the Queen City Yacht Club would be affected at times during construction" we are concerned that the long-term effects of the Project have been underestimated. The FEIS states on page 5-4-2 that "operation of the Preferred Alternative or Options A, K,

and L would not result in any negative effects on recreational activities at the yacht clubs.” Portage Bay is used for many events that are vital to the SYC’s activities including Opening Day, the Junior Sailing program, Special People’s Cruise, sailboat races, and family sail nights. Despite the importance of these activities to the SYC and the community, the FEIS does not review the long-term impact of the new bridge on the recreational activities after construction. Without a discussion of any of these specific activities with consideration for the increased footprint and ongoing congestion in the area, we do not understand how the FEIS can assert that the Project “would not result in any negative effects.”

Additionally, the Montlake Cut is the only marine access from Lake Washington to Portage Bay, Lake Union, the Ship Canal and Puget Sound. Thousands of recreational boat trips through the Cut are made each year. Yet it is also not listed in the FEIS as a recreational resource. In the discussion of effects on navigation, the FEIS indicates on pages 6-14-1 that a portion of the Lake Washington Ship Canal will be closed for two 24-hour periods and two weekends, for a total of six days of closure spread over a period of at least nine days. The FEIS also states that an additional six weeks of limited navigations restrictions may be necessary. Although WSDOT has committed that these activities will not occur during Opening Day events, these are nonetheless negative effects on the use of the area for SYC members and other recreators.

Cultural Resources

The SYC appreciates the recognition in the cultural resources section that the construction activities would affect our historic property by “diminishing the integrity of setting, feeling and association (6-6-6). We recognize the effort by WSDOT and FHWA to include measures in the PA to mitigate these effects through coordination and limitations on construction activities during the Opening Day activities. However, we feel that the FEIS and other project documents fail to recognize the potential for long-term effects on the Club from building a taller, wider bridge 110 feet closer to the SYC facilities than the existing bridge. We disagree with the statement in the FEIS that the visual effect of the bridge on the Seattle Yacht Club would not be substantial despite its closer location” (5-6-7). Additionally, the SYC and other consulting parties have not seen preliminary sketches or concept designs of the proposed bridge. Without at least preliminary designs, we cannot feel confident that the proposed mitigation measures of using context sensitive design will result in bridge that does not degrade the setting of our historic facility. Without more detailed information on the design we can also not be certain that the presence of a larger, taller bridge will not alter our ability to conduct our traditional activities in Portage Bay.

The SYC also has concerns regarding WSDOT’s contention that there will not be indirect effects on cultural resources (5-6-28). We believe that will be significant losses in economic revenue and participation in Club activities due to congestion in the area, tolling, and the alteration of the setting caused by the Project.

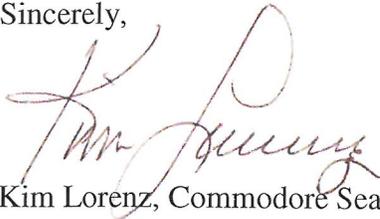
Section 4f Evaluation

The SYC is also concerned by the finding in the Section 4f Evaluation that our historic

property would not be substantially diminished by the project. As noted by WSDOT, the “new Portage Bay bridge would operate approximately 110 feet north of the current bridge, bringing the bridge closer to the Seattle Yacht Club and changing its view toward the bay” (9-9). As stated previously we believe that the wider, taller bridge will bring the noise and dirt much closer to our facility and discourage its use by our members and their guests. The new bridge may also have consequences for the use of Portage Bay for sailing classes and races, as occurred after the construction of the original 520 Bridge. The long-term effects of the projects will result in physical changes to the setting of our historic property and limit our ability to retain existing and attract new members. With fewer members it will be impossible to maintain our traditional activities, thereby substantially impairing our property’s association with the maritime history of Washington.

We hope you will consider these comments in the ongoing planning for the new bridge. Our members will continue to participate in the planning process as a consulting party to the PA. Should you have questions or wish to discuss these comments, please contact Steve Hall, SYC’s General Manager. His phone number is (206) 325-1000.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kim Lorenz". The signature is written in dark ink and is positioned above the printed name.

Kim Lorenz, Commodore Seattle Yacht Club

cc:

Randy Everett, FHWA

Jack McCullough, Esq., McCullough Hill PS

Kimberly Demuth, Cardno ENTRIX, Inc.