This note contains comments and feedback to the Supplemental Draft EIS for SR520 published 1/2010. As it stands, Chapter 5 and other sections of the Supplemental draft EIS (hereafter SdEIS) are inadequate for a variety of reasons:

I-001-001

1. The SdEIS fails to provide critical analysis on travel times on city streets for any alternatives. Travel-time information is vital for assessing the impact of all of the SR520 designs on city residents. Additional information is necessary or Chapter 5 should be rejected.

I-001-002

2. The analysis of bicycle-pedestrian impacts on Seattle city streets and sidewalks is deficient. Option A creates additional bicycle trips on the sidewalks of Montlake Blvd between SR520 and Husky Stadium. There is no analysis of how many. The sidewalks are narrow, saturated, and dangerous for bicyclists and pedestrians at the present. These problems will be exacerbated. A far more comprehensive analysis of sidewalk use within a mile of SR520 along Montlake Blvd is essential or else the SdEIS should be rejected.

I-001-003

3. The discussion of the impact of the proposed parallel vascule bridge over the Montlake cut is inadequate. The SdEIS must provide a way to evaluate the costs and benefits of this bridge. For example, I cannot determine whether the Montlake Bridge itself is the real impediment to traffic flows and person-carrying capacity flows on Montlake Blvd. If the major impediments to traffic flow are actually nearby street lights (NE Pacific Ave, Roanoke Blvd) then adding a vascule bridge has no significant purpose. The SdEIS needs a with/without analysis of the vascule bridge on vehicular, pedestrian, and bicycle traffic. Bicycle and pedestrian travel along the east side of Montlake Blvd must be thoughtfully considered. As it stands, the SdEIS is inadequate.

I-001-004

4. It is a major goal of UW's transportation plan and its climate action plan to encourage bicycle commuting to the campus. The impact of the proposed design alternatives on bicycle travel times and corridor safety from SR520 to the main campus destinations (south campus, main campus, east campus, west campus) cannot be assessed. The SdEIS is inadequate.

I-001-005

5. The geometry assumed for hauling spoils along NE Pacific Place near the UW campus is inadequate. The city, Sound Transit, and UW are considering two very different plans for the road geometry and pedestrian crossing pathways in this area. The SdEIS is not cognizant of either.

I-001-006

6. We live in the 2100 block of Shelby St in Seattle. Certain design alternatives call for hauling of spoils along Shelby and nearby Hamlin streets. Estimates vary from 5 to 20 hauls per hour on downhill and uphill grades, presumably using huge, heavy, and noisy diesel trucks. The streets are old and narrow. The water mains under them are probably a century old and in need of occasional repairs. Many homes have no feasible alternative to on-street parking. There are traffic lights at the west ends of both streets.

I-001-001

Since publication of the SDEIS, WSDOT has developed a Preferred Alternative, which is similar to Option A but with a number of design refinements that would improve mobility and safety while reducing negative effects. Chapter 2 of the Final EIS describes the Preferred Alternative.

For the Final EIS, the transportation analysis was expanded to include a VISSIM (PTV AG 2010) analysis of the Montlake interchange along with the Synchro analysis. Together, these two micro-simulation models provided more detailed information regarding local street operations, congestion, and travel time. Please see the Final Transportation Discipline Report, Chapter 6 for descriptions and exhibits showing the effects of the Preferred Alternative on local traffic volumes, intersection operations, congestion, and travel times in the Montlake interchange area. Please see Chapter 8 for a discussion of travel time effects with the second bascule bridge, provided for the a.m., p.m. and off-peak periods.

Travel times were also evaluated in Chapter 5 of the Transportation Discipline Report and Final Transportation Discipline Report for SR 520 between I-5 and SR 202.

I-001-002

Since publication of the SDEIS, WSDOT has developed a Preferred Alternative, which is similar to Option A but with a number of design refinements that would improve mobility and safety while reducing negative effects. Chapter 2 of the Final EIS describes the Preferred Alternative.

A qualitative assessment of key pedestrian and bicycle travel routes in the Montlake Interchange area has also been conducted since the SDEIS was published. Chapter 7 of the Final Transportation Discipline

I-001-007 | Parking mitigation is not described in the SdEIS. Road damage is not assessed.
I-001-008 | Noise levels of full and empty trucks on the inclined streets are not even mentioned, especially at the west end of Shelby St where large trucks must accelerate uphill when the traffic light turns green.
I-001-009 | In addition, under-street repairs to water mains cannot be attempted with large trucks using the streets. Ingress and egress for large emergency vehicles are not addressed. Noise and vibration mitigation measures are not adequately analyzed.
I-001-010 | The safety issues related to small children who live along these two residential
I-001-011 | streets must be addressed. The impact on bicycle commuters who regularly use the streets are not analyzed. The generation of construction dust, lights, and noise
I-001-012 | needs to be added to the SdEIS.
I-001-013 | There is no mention of any alternative means of disposing of spoils, such as barges or temporary truck ramps to SR520. There is also no mention of how the construction-related problems will be addressed if the City of Seattle does not issue a construction variance.

I-001-014 | 7. Property values will be affected by various road configurations. Because of its location, I would guess that our property values will decrease by 10-20% for option A (or A+), decrease by a few percent for option L and may increase sightly for option K. While property value may not be a problem taken up in the SdEIS, it has an impact on the budgets of the project options.

I-001-015 | 8. Similarly, there is no mention in the SdEIS of litigation costs that are likely to be incurred under each of the three of the alternative plans. These costs need to be added to the costs of each of the alternatives, along with an analysis of the related construction delays and their costs. Since so much of the value of my property is threatened in option A, I plan to support and join a neighborhood group to defend our property values and quality of life.

I-001-016 | We oppose option A-A+ for its obvious impacts on the Lake Washington waterfront and the Arboretum. The road width is the primary problem. The quality of the Arboretum experience will be badly compromised. We also opposed A-A+ for many of the reasons mentioned above, especially its lack of benefit on city residents and drivers, its possible negative impacts on bikes and pedestrians on sidewalks between the SR520 roadway and UW, and the loss of property value of my house and those of my neighbors.

I-001-017 | We favor a 4-lane SR520 bridge that fits within the footprint of the existing SR520 right of way in Seattle. Of the designs A, K, and L, only option L is acceptable. Despite its many merits, option K is a blight.

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Seattle 98112
24 January 2010

Report now includes this assessment, which includes an evaluation of the following criteria - safety, connectivity, efficiency, and capacity for seven primary travel routes.

I-001-003

The Final Transportation Discipline Report indicates that with the Preferred Alternative, transportation operations would be improved in the Montlake area compared to the No Build Alternative. The second bascule bridge would create lane continuity between the Montlake Cut and the SR 520 Montlake interchange, which would improve traffic operations compared to the No Build Alternative. The bridge would provide additional capacity for transit/HOV, bicycles, and pedestrians and would provide bicycle lanes across the Montlake Cut. Most notably, overall delay related to bridge openings would decrease for all vehicles because the additional capacity would help clear congestion more quickly. The ESSB 6392 workgroup considered priority treatments for transit in the project area and the Montlake corridor. Since the SDEIS was published, WSDOT, in collaboration with the City of Seattle, King County Metro, and Sound Transit, has evaluated transit signal priority in the Montlake interchange area. Chapter 6 of the Final Transportation Discipline Report describes the changes in traffic volume and operations on the local streets in the Montlake interchange area with the Preferred Alternative. Chapter 7 describes the effects of the Preferred Alternative on nonmotorized transportation facilities and connections. Chapter 8 describes the effects of the Preferred Alternative on transit service, facilities, ridership, travel times during a.m., p.m., and off-peak periods, and rider connections.

I-001-004

A qualitative assessment of key pedestrian and bicycle travel routes in the Montlake Interchange area has been conducted since the SDEIS was published. Chapter 7 of the Final Transportation Discipline Report now includes this assessment, which includes an evaluation of the

following criteria - safety, connectivity, efficiency, and capacity for seven primary travel routes. The connection between the SR 520 regional trail and the Burke-Gilman Trail/UW was evaluated in this assessment, and the results indicate that the Preferred Alternative would benefit to the nonmotorized network in all four areas.

I-001-005

Construction assumptions developed for the project identify major freeways such as I-5, SR 520, and I-405 as primary haul routes intended to carry most project truck traffic. However, there will be times when city streets will need to be used as secondary haul routes. Secondary haul routes for the SR 520, I-5 to Medina project were identified based on criteria such as shortest off-highway mileage, and providing access to locations needed for construction where direct highway access is unavailable.

Since publication of the SDEIS, WSDOT has refined potential haul routes to avoid using non-arterial neighborhood streets. Local jurisdictions can limit the use of non-arterial streets for truck traffic; therefore, efforts were made to identify designated arterial streets for potential use as haul routes. Local jurisdictions will determine final haul routes for those actions and activities that require a street use or other jurisdictional permit. The permit process typically takes place during the final design phase and prior to construction.

NE Pacific Place is identified as a potential haul route for Options K and L, but not for Option A or the Preferred Alternative. See Chapter 3 of the Final EIS for updated information on potential construction haul routes.

I-001-006

See the response to Comment I-001-005 regarding potential haul routes. East Shelby Street and East Hamlin Street were identified as potential haul routes only for Options K and L and continue to be identified for those options in the Final EIS; however, they are not identified as

potential haul routes for Option A or the Preferred Alternative. Your comments about the condition of both streets are noted.

I-001-007

See the response to Comment I-001-005 regarding potential haul routes. Chapter 12 of the Final Transportation Discipline Report includes a description of jurisdiction guidelines for parking improvements and describes the process for determining parking measures that may be implemented as part of the project.

I-001-008

Increased noise in neighborhoods during construction, including the Montlake neighborhood north of SR 520, was discussed throughout Chapter 6 of the SDEIS. Noise caused by construction truck traffic was not estimated for specific locations; however, in Section 6.7 of the SDEIS, the maximum noise level expected from haul trucks was in Table 6.7-1. The table indicated that haul trucks would generate up to 86 dB of noise at 50 feet from the roadway. This, for example, would be the maximum noise level caused by haul trucks traveling on Shelby Street to and from the staging area at the former site of the Museum of History and Industry.

I-001-009

See the responses to Comments I-001-005 and I-001-009 regarding potential haul routes.

Regarding under-street repairs to water mains, WSDOT would coordinate project construction activities with any additional construction taking place on East Shelby or East Hamlin Streets to ensure all planned and programmed work, or any emergency work could be completed.

I-001-010

WSDOT will limit noise and vibration as much as possible during construction of the project. A number of measures to reduce the effects from construction noise and vibration were proposed in Section 6.7 of the SDEIS. These measures included requiring all engine-powered equipment to have mufflers, requiring all equipment to comply with EPA noise standards, limiting use of noisy equipment such as pile drivers and jack hammers to daytime work hours, installing temporary or portable acoustic barriers around stationary equipment, shutting off idling equipment, restricting use of back-up alarms during evening hours, and scheduling construction operations to avoid periods when noise would create an annoyance. WSDOT will develop a vibration monitoring plan that will provide guidelines for monitoring construction vibration at sensitive properties and structures to avoid damage during construction in the Montlake area. Monitoring will take place if vibration from impact construction methods is expected to exceed a certain threshold. Such impact methods include pile driving and vibratory sheet pile installation.

I-001-011

See the response to Comment I-001-006 regarding potential haul routes.

I-001-012

Construction noise was addressed in Section 6.7 of the SDEIS. Please see the response to comment I-001-008.

I-001-013

Pages 10-11 through 10-14 of the SDEIS Transportation Discipline report discuss the assumptions used to identify potential haul routes and estimates, and explicitly state that spoils and other hauling activities could be achieved using barges. It was assumed that hauling via truck would present the worst-case scenario for traffic modeling and transportation analyses, which was presented in the SDEIS.

Text has been added to Chapter 3 of the Final EIS, disclosing the assumption that barges would be used to transport materials, excavation and demolition spoils, and equipment.

I-001-014

Comment acknowledged. The project's effect on the local real estate market and property values was not analyzed within the EIS. The Land Use, Economics, and Relocations Discipline Report and Addendum include an analysis of the "real" property impacts (fee area acquisitions) and the resulting economic effects for each option and the Preferred Alternative.

I-001-015

While the SDEIS itself does not explicitly discuss the risks of litigation and the possible costs associated with litigation, the costs provided in the SR 520, I-5 to Medina SDEIS for all alternatives include costs associated with legal challenges, as well as factoring in delays associated with a legal challenge. The costs disclosed in the SDEIS were generated during the Cost Estimate Validation Process. During this process, the SR 520 program assigns a level of risk of legal challenge to various elements of the Environmental process, and that risk is translated into personnel costs and delay costs that are applied and incorporated into the overall project cost. For more information about the Cost Estimation Validation Process, see the WSDOT internet website http://www.wsdot.wa.gov/Projects/ProjectMgmt/RiskAssessment/.

I-001-016

Comment noted. WSDOT received a number of comments in support of and in opposition to Options A, K, and L and the associated suboptions. These opinions are summarized in the Supplemental Draft

Environmental Impact Statement Summary of Comments (WSDOT, April 2010), available at http://www.wsdot.wa.gov/Projects/SR520Bridge/SDEIS.htm.

Since publication of the SDEIS, WSDOT has identified a Preferred Alternative, which is similar to Option A but with a number of design refinements that would improve mobility and safety while reducing negative effects. Chapter 2 of the Final EIS describes the Preferred Alternative and Chapters 5 and 6 describe its environmental effects.

I-001-017
Comment noted.