Erin O'Connor
2612 10th Ave E
Seattle, WA 989102
April 14, 2010

Jenifer Young
Environmental Manager
SR 520 Program Office
600 Stewart Street, Suite 520
Seattle,WA 98101

Dear Ms. Young:

C-022-001

Although we are dismayed at the prospect of adverse effects on our historic resources from the SR 520 Bridge Replacement and HOV Project, we are confident that a fair and accurate consideration of the setting, feeling, and characteristic use of our historic resources and the likely multiple, indirect, and cumulative adverse effects from construction and operation of the project will lead to efforts on WSDOT's part to avoid, minimize and mitigate those adverse effects and to cement understandings in a Memorandum of Agreement. Following are some measures that make sense in light of the nature of these adverse effects during construction and in anticipation of operation.

Construction

- **Construct solid fencing and plant buffering vegetation** to protect historic resources in the Roanoke Park Historic District and historic properties in the Portage Bay neighborhood from the effects of demolition and reconstruction of the three bridges over I-5 on East Roanoke Street and over SR 520 on 10th Avenue East and Delmar Drive East, from the effects of construction of the two new lids, and from the effects of the demolition and reconstruction of the Portage Bay Bridge, which will be moved closer to and in front of more homes in the Roanoke Park Historic District and the Portage Bay neighborhood.

C-022-002

- **Without the lids that have been designed into the project, that are an integral part of the project, and because the "temporary" construction effects would go on for seven and a half to eight years,** these effects on historic resources in the Roanoke Park Historic District and Portage Bay neighborhood would be tantamount to ultimate "demolition by neglect" as property values plummeted, and even then visual blight, noise, dust, vibration, and diesel emissions would mean that people would not be able to sell their homes for amounts approaching their present worth. Many of the houses would be rented out to lower income renters, those not in a position to avoid living so close to a mammoth, many-years-long freeway construction project. Some, perhaps many, of the houses would become rooming houses as happened after the construction of I-5 and SR 520 and the economic decline of the 1970s. As we saw then on the borders of the district, a general deterioration would ensue in the absence of owner-residents who work steadily to improve their historic houses and their communities. Repairs would tend to be done on the cheap, with little regard for the historic integrity that owner-residents have maintained over 100 years. With the deterioration of the social fabric of the neighborhoods, would come a deterioration of the setting and feeling of the Roanoke Park Historic District and of the historic resources in the Portage Bay neighborhood.

- Families with young children especially would be likely to move away to protect their children from the **protracted health effects of a seven-and-a-half-to-eight-year construction project.** A snapshot survey conducted by the Portage Bay/Roanoke Park Community Council reported that 126 young people under the age of 20 live in the district. 79 of these children are under the age of 14. (Because parents are reluctant to reveal this kind of information in today's social climate, the number of young children is probably underreported.)

C-022-001

Upon additional analysis, research, and review, WSDOT has determined that the Preferred Alternative would slightly alter the integrity of the Roanoke Park Historic District, caused by some indirect visual and potential noise effects that would affect the setting and feeling of the district. The Roanoke Park Historic District's characteristics of integrity would be altered by the project. However, stipulations of the Programmatic Agreement (Attachment 9 to the Final EIS) would resolve the effects that could temporarily or permanently alter or diminish the integrity of the historic district.

In place of a Memorandum of Agreement, a more suitable Programmatic Agreement was used as the formal, legally binding document between FHWA, the Advisory Council on Historic Preservation (ACHP), the State Historic Preservation Officer (SHPO), WSDOT and the other Section 106 consulting parties. A Programmatic Agreement is typically used in place of a Memorandum of Agreement when effects on historic properties cannot be fully determined prior to the approval of an undertaking, for large, complex and controversial undertakings, or where other circumstances warrant a departure from the normal Section 106 process.

The Section 106 consulting parties, including the Roanoke Park Historic District, were included in the development of the Programmatic Agreement. The Programmatic Agreement records the terms and conditions agreed upon to resolve the potential adverse effect from the project. The Portage Bay/Roanoke Park Community Council participated in the development of the agreement.

In addition to the Programmatic Agreement, WSDOT is working in partnership with the Section 106 consulting parties to develop a Community Construction Management Plan (outlined in Attachment 9 to the Final EIS). The Community Construction Management Plan will contain specific mitigation measures designed to protect historic resources from construction effects. It will also address quality-of-life

C-022-002

- These would be serious indirect adverse effects on the single-family with children demographic of our neighborhoods and on businesses and schools in the neighborhoods.

C-022-003

  - According to WSDOT consultant Larry Kyle, the construction plan for the bridge replacements is to build **half lids** to serve traffic as temporary bridges north of the present East Roanoke Street Bridge and east of the present 10th Avenue East Bridge over SR 520. (The closure of Delmar Drive East, as we understand it, means that a temporary bridge [half lid] will not be constructed adjacent to the present Delmar Drive East bridge over SR 520 at Delmar Drive East.)

  - **Finishing and landscaping the lids over I-5 and SR 520 immediately after the replacement bridges have been constructed and put into operation** would spare historic resources from many of the further adverse effects of the preferred option's six- or seven-lane Portage Bay Bridge project's six-year construction phase and the highway widening phase and would provide **an opportunity for monitoring and fine**-tuning to perfect measures to avoid, minimize, and mitigate subsequent operation effects on historic resources.

  - Deferring lid construction, as is predicted in the SDEIS's indication that the Phased Implementation Scenario is the most likely construction scenario, would lead to major adverse construction effects on historic resources that could be avoided or minimized. The most vulnerable parts of the project, most in need of replacement, should of course be taken care of first. But lids could go a long way toward easing construction effects. **Note that both the I-5 and the 10th and Delmar lids are designed and option neutral. Their early installation would be an expression of good faith on WSDOT's part, an expression badly needed at this stage of WSDOT's relations with the communities and institutions adjacent to the project.**

- **Adverse effects to both buildings and vegetation from demolition and construction effects** of all three arterial bridge projects and the two lid projects should be anticipated, and ways of avoiding or minimizing, the effects of this extremely dusty, clogging, eroding and soiling, noisy, and earth-shaking demolition and construction activity should be discussed in a Memorandum of Agreement.

C-022-004

- WSDOT should stay in touch with the residents. WSDOT should furnish **current contact phone numbers and an e-mail address** so that residents can keep WSDOT apprised of effects, and WSDOT should make speedy response to resident notifications. **Developing a website and reporting periodic monitoring results would be a good idea as well.**

C-022-005

- Every precaution should be taken to ensure that historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood are not affected during construction by vibration, excavation, or heavy equipment. **Monitor vibration levels** for all demolition and construction activity.

  - **Monitor noise periodically at bedroom height** and ensure compliance with local noise regulations for construction and equipment operation. "Periodically" could mean regularly and whenever a new kind of construction activity starts up and during that activity.

  - **Monitor air quality periodically from the construction footprint to 300 meters from any construction activity.** (300 meters is the distance the *Health Impact Assessment* says highway pollution would reach.) "Periodically" could mean both regularly and whenever a new kind of construction activity starts up and during that activity.

  - **Install fencing and landscaping or landscaped buffers in the Roanoke Parklands South East and West and other areas** where historic resources would be exposed to construction and

issues. The Community Construction Management Plan will include a number of stipulations, including, but not limited to:

- The use of best management practices to minimize construction noise, air emissions, and visual effects
- Limitations on various types of construction activity by time of day or day of week
- Estimates of haul route traffic during average and peak construction periods and provisions to minimize its effects on properties along the haul routes
- Management of detour routes to ensure that access to homes, business, and public facilities and services is maintained
- Special protective measures for facilities that have been determined to be at risk from vibration
- Measures designed to protect the setting and integrity of historic properties and districts
- Contact information for a hotline to resolve construction-related issues

The Final EIS contains additional information about mitigation measures that could be determined at the current level of project design development. Through coordination with agencies and the community in accordance with Engrossed Substitute Senate Bill 6392 and the permit application process, WSDOT will continue to define mitigation measures for the project as design development progresses.

C-022-002

The SDEIS discussed the possibility of constructing the project in separate phases over time, with the vulnerable structures (the Evergreen Point floating bridge, west approach bridge, and Portage Bay bridge) built first. This "Phased Implementation scenario" was analyzed for each environmental resource. Due to the funding shortfall, FHWA and WSDOT still believe it is prudent to evaluate the possibility of phased construction of the corridor should full project funding not be available by

C-022-005

operation effects of the project to offset the removal or reduction of vegetation in buffer zones and where new or relocated traffic lanes intrude on the character of the historic district or the settings of individual historic properties.

- **Install historically faithful double-paned windows** in houses likely to be affected by seven and a half to eight years of increased construction noise.
- **Wash windows** of affected historic buildings periodically.
- **Protect exteriors of affected historic buildings** from an accumulation of excessive dirt and dust during demolition, staging, hauling, and construction, and clean them in an appropriate manner periodically during construction and at the conclusion of construction. WSDOT is to consult with the SHPO and/or the Seattle Historic Preservation Officer before implementing any protection or cleaning methods.
- **Protect mature trees** from vibration and an accumulation of excessive dirt and dust during demolition, staging, hauling, and construction. Wash them periodically.
- Locate any construction sheds, barricades, or material storage away from historic properties, and **avoid obscuring views of and views from historic properties**.
- **Provide construction access directly to and from the construction zone along arterials** to eliminate construction truck traffic and detours along residential streets in the Roanoke Park Historic District and the Portage Bay neighborhood.
- Make every effort to keep the historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood accessible and functional during and after construction. **Residents should have priority in reaching their homes and accustomed parking places.**

C-022-006

Operation

- Depending on the option, **noise walls and/or quieter pavement** have been incorporated into the design of the project to reduce noise along the proposed roadway. The choice of noise reduction method along the segments of the project should be made in light of both effectiveness and potential visual effects. **The use of more than one method should be considered**. Minimization of noise at expansion joints should be a priority. **Measure and compare the respective noise reducing methods at bedroom height in both the Roanoke Park Historic District and the Portage Bay neighborhood.** WSDOT should consult with the Arizona Department of Transportation, which has experienced great success with quieter pavement over many years with studded tires, chains, and freezing and thawing in the Flagstaff area, on proper installation and maintenance of quieter pavement.

C-022-007

- New lids have been designed to cover I-5 at the East Roanoke Street crossing and to cover SR 520 at 10th Avenue East and Delmar Drive East. These **lids are to be landscaped and have pedestrian crossings, providing a new green space in each area and reuniting the communities on either side.** The landscaped lids will also help to minimize the visual and audible effects of I-5 and SR 520. (See the discussion of early lid construction and landscaping as mitigation in the "Construction" section above.)
- **New bicycle/pedestrian paths are to be built along the I-5 and 10th and Delmar lids** to reconnect the Roanoke Park and North Capitol Hill neighborhoods, the Roanoke Park and Eastlake neighborhoods, and the Roanoke Park and Portage Bay neighborhoods, particularly with respect to the many schools in these neighborhoods, and to enhance pedestrian access, which was made unpleasant when I-5 and SR 520 were built in the 1960s.

2012. Currently committed funding is sufficient to construct the Evergreen Point floating bridge and landings; a Request for Proposals has been issued for this portion of the project, with proposals due in June 2011. Accordingly, this Final EIS discusses the potential for the floating bridge and landings to be built as the first phase of the SR 520, I-5 to Medina project. This differs from the SDEIS Phased Implementation scenario, which included the west approach and the Portage Bay bridge in the first construction phase. See Section 2.8 of this Final EIS for further information on potential project phasing.

However, lids are considered a major project element and would be built at the same time as the corresponding portion of the corridor, and mitigation measures would be undertaken concurrently with the portion of the project causing the impact.

During the construction period, expected to last from 2012 to 2018 except as noted with revised potential phasing, WSDOT will employ a number of best management practices to reduce effects from construction. Additionally, WSDOT will adhere to the terms and conditions set forth in the Programmatic Agreement and will implement the mitigation measures in the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS). As stated in the response to Comment C-022-001, the Section 106 consulting parties have been integral to the development of the Programmatic Agreement and the Community Construction Management Plan.

Research indicates that the impacts of a transportation project on property values cannot be calculated with certainty. Property values fluctuate constantly based on a variety of factors, including the condition of the economy at the national, state, and local level. Proximity to a newly constructed roadway is another factor that could have an effect on the value of the property, but it is not possible to quantify this effect with any certainty. Some properties could be negatively affected by a new

C-022-008

- **Every measure should be taken to ensure that historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood are not affected by visual blight, vibration, noise, air pollution, and nighttime glare in operation** of the new arterial bridges, the widened highway, the SR 520 bridges (including the Portage Bay Bridge, the West Approach, and the floating bridge), and ramps.

C-022-009

- As mitigation, WSDOT should work with the Roanoke Park Historic District to **engage designers or sponsor a competition to provide historic markers for the Roanoke Park Historic District** at East Shelby Street on Harvard Avenue East and on three gateways to the Roanoke Park Historic District: East Roanoke Street at Harvard Avenue East, the main gateway at 10th Avenue East at its intersection with East Roanoke Street, and Delmar Drive East at its intersection with East Roanoke Street. Historic lighting fixtures would be a part of this design project.

C-022-010

- In addition, WSDOT has been working with the Roanoke Park Historic District to come up with a **treatment of the streets that run along the Roanoke Park Historic District on its south and west sides that is sympathetic with the residential, tree-lined setting of the Roanoke Park Historic District, urban intersections, and in the interests of traffic calming**. Rob Berman, the SR 520 Program Planning Manager, asked us for a plan, which we have furnished. The plan has met with WSDOT's approval and has been passed to SDOT for their evaluation. When approval has been granted, this intention should be recorded in the Memorandum of Agreement.

C-022-011

- **The introduction of traffic calming devices on the arterials to keep traffic moving at a slow and steady speed, less polluting than idling or high speeds**, would contribute to a lessening of the air pollution that threatens the structural integrity of materials in the built historic environment and that would harm the mature shade trees that so contribute to the atmosphere and feeling of the district's setting.

C-022-012

- **The undergrounding of wires on the bridges and along the arterials** would permit the planting of tree canopy so characteristic of the setting of the historic district the streets run beside and help to reduce the accurate perception that air pollution from two more lanes of gas-powered vehicles had worsened air quality in our neighborhoods.

C-022-013

- **The use of quiet pavement on SR-520 as it runs along the West Approach, the Portage Bay Bridge, and the highway to I-5, on ramps, and on Harvard Avenue East, East Roanoke Street, 10th Avenue East, Delmar Drive East, and Fuhrman-Boyer Avenue East** would further contribute to the quiet atmosphere and feeling for which the Roanoke Park Historic District and the Portage Bay neighborhood are noted.

C-022-014

- Having undergrounded overhead wires and constructed substantial lid columns, **plant large shade trees to create a canopy over the streets that run alongside the Roanoke Park Historic District on the west and the south, along the three arterial replacement bridges, along the edges of the lids and on lid columns, and along Fuhrman-Boyer Avenue East.**

C-022-015

All of these measures to avoid, minimize, and mitigate the construction and operation of the SR 520 Bridge Replacement and HOV project should be recorded and committed to in a Memorandum of Agreement between WSDOT and the Portage Bay/Roanoke Park Community Council to protect and enhance the historic resources in the Roanoke Park Historic District and the historic resources in the Portage Bay neighborhood.

Sincerely,

Erin O'Connor
Historic Resources Chair, Portage Bay/Roanoke Park Community Council
Roanoke Neighborhood Elms Fund
Friends of Roanoke Park

roadway, while others could benefit from reduced congestion. Therefore, it would be speculative to draw conclusions about changes in property value, and consequent changes in population, as a result of the project.

Health effects are also difficult to predict due to a wide range of variables. The Health Impact Assessment recommended measures that could be incorporated to improve the region's overall quality of health. Protecting human health is one of the reasons behind many of the studies conducted as part of an EIS.

C-022-003

The potential effects from the construction of an enhanced bicycle and pedestrian path on the East Roanoke Street Bridge and from the overall construction process for the 10th Avenue and Delmar lid have been discussed with the Section 106 consulting parties throughout the Section 106 consulting process.

A temporary bridge or portions of the lid will be constructed adjacent to the 10th Avenue East bridge for use as a detour during replacement of the 10th Avenue East bridge. This will allow uninterrupted service on 10th Avenue East except for intermittent closures during off-peak hours and/or on weekends. Once the main structural components of the 10th Avenue East and Delmar Drive East lid have been built, the remainder of the lid would be constructed. Landscaping would follow as the final step.

Lids would be built at the same time as the corresponding portion of the corridor, and will not be delayed or deferred.

As noted in the responses to Comments C-022-002 and C-022-003, the mitigation measures contained in the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS) will help to minimize the associated effects from construction.

From: Erin O'Connor [mailto:erinoc28@comcast.net]
Sent: Wednesday, April 14, 2010 1:39 PM
To: Young, Jenifer (Consultant); SR 520 Bridge SDEIS; Brooks, Allyson
Cc: 'Houser, Michael (DAHP)'; Karen.Gordon@seattle.gov; chris.gregoire@gov.wa.gov; Turner, Joyce; Arnold-Williams, Robin; Brown, Marty; edward.murray@leg.wa.gov; frank.chopp@leg.wa.gov; jamie.pedersen@leg.wa.gov; mike.mcginn@seattle.gov; 'Richard Conlin'; mike.obrien@seattle.gov; tom.rasmussen@seattle.gov; jean.godden@seattle.gov; tim.burgess@seattle.gov; Nick.Licata@Seattle.Gov; warneda@consultant.wsdot
Subject: Addendum on Mitigation for Adverse Effects of 520 project on Historic Resources in Roanoke Park Historic District and Portage Bay Neighborhood

Dear Ms. Young:

C-022-016

As promised at the end of our March 2009 formal comments on the *SDEIS* December 2009 *Cultural Resources Discipline Report* (below and attached), we are sending you an addendum (attached) on proposed mitigation measures (meant to be understood as avoidance, minimization, and mitigation measures) of the adverse direct, indirect, and cumulative effects of the SR 520 Bridge Replacement and HOV Project construction and operation on historic resources in the Roanoke Park Historic District and the Portage Bay neighborhood. We trust that these proposed mitigation measures will be included in a Memorandum of Agreement between WSDOT and the Portage Bay/Roanoke Park Community Council.

Sincerely,

Erin O'Connor
Historic Resources Chair, Portage Bay/Roanoke Park Community Council
Roanoke Neighborhood Elms Fund
Friends of Roanoke Park

C-022-004

In accordance with the stipulations outlined in the Programmatic Agreement, WSDOT will develop a communications plan that will include a process for making up-to-date construction information available to the public, a single-point communications center with a 24/7 contact phone number, and notification of construction updates and permit conditions.

WSDOT will continue to provide information via the project website located at: http://www.wsdot.wa.gov/Projects/SR520Bridge/bridgeproject.htm.

C-022-005

Please see the response to comment C-022-001, which states that WSDOT will implement the stipulations contained within the Section 106 Programmatic Agreement and the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS) to resolve the adverse effect to historic properties from the SR 520 I-5 to Medina project.

C-022-006

The Preferred Alternative incorporates a number of noise reduction strategies, including: 4-foot concrete traffic barriers with noise absorptive coating, noise absorptive materials around lid portals, and reduced speed limits on the Portage Bay Bridge. Use of these noise reduction strategies would reduce noise within the corridor, compared to the No Build Alternative. Noise walls are not recommended for the Preferred Alternative except in Medina and potentially along I-5 in the North Capitol Hill area where the reasonableness and feasibility of a noise wall is still be evaluated (see Section 5.7 of the Final EIS). Recommended noise walls would only be constructed if approved by the community.

Noise modeling for both the SDEIS and Final EIS was performed for the typical outdoor uses at noise sensitive properties along the corridor, as

required by the FHWA and WSDOT. No noise modeling is performed at upper floors except for multi-family residences where a deck is the main outdoor use. The analysis uses projected year 2030 traffic volumes and vehicle mixture (cars, medium and heavy trucks, and buses) at the proposed speed limits, and included the effects of the lids and tall traffic barriers. WSDOT's noise analysis and abatement efforts are in compliance with the National Environmental Policy Act of 1969, the Federal-Aid Highway Act of 1970, the Noise Control Act of 1972, and follows the Code of Federal Regulations (CFR) 772.

The noise analysis of the Preferred Alternative for the Final EIS includes the aforementioned noise reduction strategies. An analysis of noise walls is also included where warranted. The FHWA traffic noise model has shown that the Preferred Alternative, with these design options, would reduce overall corridor noise levels compared to the No Build Alternative.

Quieter concrete pavement is included as a design feature for Option A, Option K, and the Preferred Alternative; however, because it is not an FHWA-approved mitigation measure and because future pavement surface conditions cannot be determined with certainty, it is not included in the noise model for the project. WSDOT is continuing testing and evaluation of quieter concrete pavement to determine the best overall pavement type for the project.

C-022-007

The Preferred Alternative includes lids and enhanced crossings in three locations, including an enhanced pedestrian and bicycle crossing over I-5 at East Roanoke Street, a 10th Avenue East and Delmar Drive East lid, and a Montlake lid. An enhanced crossing is a structure built over a roadway that improves bicycle and pedestrian movements and offers aesthetic improvements such as plantings or views. The primary purpose of a lid is to reconnect communities and landscapes by creating open

space, restoring or creating views, and enhancing bicycle and pedestrian movement.

C-022-008

The Preferred Alternative would cause an indirect visual effect on the Roanoke Park Historic District from the operation of the Portage Bay Bridge. The change in visual quality would be mitigated through context-sensitive design. Conversely, the Roanoke Park Historic District would experience a visual improvement from the 10th Avenue East and Delmar Drive East lid.

The noise analysis of the Preferred Alternative for the Final EIS determined that noise in the Portage Bay area would generally decrease compared to the No Build Alternative. WSDOT analyses have also shown that local air quality would improve compared to the No Build Alternative, and no negative air quality effects are expected from operation of the Preferred Alternative.

Nighttime glare and vibration from operation of the Preferred Alternative are not expected to affect the historic resources in the Roanoke Park Historic District.

WSDOT has committed to mitigating adverse effect to historic resources resulting from the Preferred Alternative. The Programmatic Agreement between WSDOT and the Section 106 consulting parties (including the Portage Bay/Roanoke Park Community Council) contains stipulations agreed upon to resolve the adverse effect from the project. Discussions and negotiations between WSDOT and the Section 106 consulting parties for this Programmatic Agreement took place from 2010 to 2011.

C-022-009

According to the stipulations in the Programmatic Agreement, WSDOT will provide funding to the Roanoke Park Historic District to prepare a

sign plan, and then have historic markers fabricated and installed at the major entrances to the district.

C-022-010
Stipulations in the Programmatic Agreement require WSDOT to adopt the design for the 10th Avenue and Roanoke intersection that was negotiated between Seattle Department of Transportation and the adjacent neighborhoods; develop the design plan for the 10th Avenue East and Delmar Drive East lid that is compatible with the historic character of the Roanoke Park Historic District.

C-022-011
Traffic calming measures have been added to the design of the Portage Bay Bridge, including a planted median and reducing the speed limit to 45 mph.

C-022-012
WSDOT coordinates with the utility agencies throughout the project development process to determine the appropriate placement of utilities along the bridge and arterials. Selecting replacement trees using the approved Seattle Street Tree list will allow for the selection of tree plantings compatible with utility placement and which blend with the Roanoke Park Historic District setting. Per stipulations in the Programmatic Agreement WSDOT will develop a landscape design compatible with the adjacent historic districts will also be applied to the 10th Avenue East and Delmar Drive East and Montlake lids.

WSDOT analyses have shown that local air quality would improve over the No Build Alternative, and no negative air quality effects are expected from operation of the Preferred Alternative.

C-022-013

Quieter concrete pavement is included as a design feature for Option A, Option K, and the Preferred Alternative; however, because it is not an FHWA-approved mitigation measure and because future pavement surface conditions cannot be determined with certainty, it is not included in the noise model for the project.

C-022-014

Please see the response to comment C-022-012, which states that WSDOT will develop a landscape design, compatible with the historic district, and will apply it to areas around the Roanoke Park Historic District.

C-022-015

Through the Section 106 process, WSDOT worked with the Portage Bay/Roanoke Park Community Council and other Section 106 consulting parties to develop the Programmatic Agreement and the Community Construction Management Plan (outlined in Attachment 9 to the Final EIS). Both the Programmatic Agreement and Community Construction Management Plan are designed to resolve the project's adverse effect on historic properties.

C-022-016

WSDOT has read, considered, and responded to every official comment letter that pertained to the SDEIS.