From: Greg Lindhorst [mailto:gregli@hotmail.com]
Sent: Thursday, April 15, 2010 8:40 PM
To: SR 520 Bridge SDEIS
Subject: Comments on 520 SDEIS

I-309-001

From: Greg Lindhorst, 2045 E Newton St, Seattle, WA 98112. These comments were also submitted through the online comment survey, but I wanted to be sure they were received.

Hello. My wife, children, and I are residents of the Montlake neighborhood. We travel Montlake Boulevard and 520 almost every day, and play in the adjoining parks and Arboretum often. We live here, and so we take this project very seriously, as it has a significant impact on our quality of life. We have reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) and have concerns both about the final design and the process of construction.

In general, we find that Option A/A+ is inadequate at moving people efficiently, reliably, and predictably east-west across Lake Washington and north-south through the Montlake Boulevard corridor. This option creates a bottleneck on Montlake Boulevard, where single occupancy vehicles, high occupancy vehicles, busses, pedestrians, bicyclists, and Montlake residents all converge in a very small corridor. It makes no sense to have the transit hub at Pacific be separated by drawbridges to the highway. Options K and L, despite their problems, separated some of these uses, resulting in better efficiency for both east-west and north-south travel, and a higher quality of life for those outside of cars (transit commuters, pedestrians, cyclists, home owners, and businesses).

As has been pointed out by many, these designs favor more highways and more cars over more space efficient alternatives, such as mass transit. The simple fact is that Seattle's streets cannot absorb the additional cars that these plans would place on them, and the result is a reduced quality of life for neighborhood residents and businesses. The Arboretum ramps are a perfect example of this - we all know it is wrong to run an arterial through a major park, but that is the only choice we are left with given the volume of cars 520 will bring.

I-309-002

Instead, we favor the designs proposed by Mayor McGinn. From its opening, the new 520 should include light rail: 4 general purpose car lanes + 2 light rail lanes across Lake Washington, and then only 4 general purpose car lanes across Portage Bay. We should divert the light rail lanes to the U-Link station before reaching Montlake, in the area of Foster Island (similar to Option K and L, but not all traffic, just light rail). Finally, we should remove the HOV/Transit on and off ramps from the Montlake Interchange, significantly shrinking the footprint of this interchange. The advantages to this plan are numerous, which include all the benefits of a smaller footprint plus less cars on Seattle streets and less clogging at I-5.

I-309-003

I-309-001

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-309-002

Section 2.4 in the Final EIS explains why initial implementation of light rail transit on SR 520 is not planned. The decision to locate Sound Transit's initial east-west light rail transit corridor on I-90 rather than SR 520 has been made through extensive regional deliberation (see Table 2-2 of the Final EIS).

The SR 520, I-5 to Medina project would result in immediate benefits for transit speed and reliability in the corridor by providing high-occupancy vehicle (HOV) lanes across the floating bridge and better HOV connections at the Montlake and I-5 interchanges (see Section 5.1 of both the SDEIS and Final EIS). The HOV lanes would allow for the near-term implementation of bus rapid transit, as called for in the SR 520 High-Capacity Transit Plan (see Section 2.4 of the Final EIS for further information about bus rapid transit).

The Preferred Alternative evaluated in the Final EIS minimizes the footprint of project wherever possible while complying with safety and operational standards. A 4-lane Portage Bay Bridge would not allow for

I-309-004

Here are more detailed comments:

1. We are very concerned about the width of the corridor through our neighborhood and across Portage Bay. The on and off ramps for both general traffic and HOV/transit, with their approaches, makes the highway significantly wider than it is today. This has a number of negative impacts. This design facilitates more capacity for cars on 520, which will result in more air and noise pollution in our neighborhood. With Option A/A+, it will be much more difficult and dangerous for pedestrians and bicyclists to cross from south of 520 to north of 520 at the Montlake Interchange. Views of Portage Bay will be obscured by more concrete, making 520 more of an eye sore than it is today.

I-309-005

2. The Montlake Interchange is a very complex system, connecting a freeway, transit, pedestrians, bicycle paths, and at the same time trying to reconnect the two parts of the Montlake neighborhood. Details matter. Important details of the design are missing from the SDEIS, making it difficult to fully evaluate the proposal, especially for pedestrians where safety is the primary concern. The current interchange design, with its long and numerous entry and exit ramps to 520, appears to favor freeway access over pedestrian, bicycle, and transit use at the very heart of the Montlake neighborhood.

I-309-006

3. The Montlake Lid proposed with Option A falls well short of the goals of creating a usable green space, connecting parks from the Arboretum to the Montlake Playfields, and reconnecting the Montlake neighborhood. It is difficult to call it a lid because of all the roads and ramps that cross it. The HOV/transit ramps coming on/off 520 to Montlake Boulevard forces the "hole" in the lid between Montlake Boulevard and 24th Ave. Instead, we should have the HOV/transit lanes come on/off 520 east of 24th Ave, roughly where MOHAI is now, and travel north of 520 to reach Montlake Boulevard.

I-309-007

4. As a cyclist who often uses Montlake Boulevard to access the Burke-Gillman Trail, and who is looking forward to the new bike path on 520, I am concerned with how the bike lanes interconnect with the highway. Sharp corners and switchbacks are hard for cyclists to negotiate and become a safety concern. More detail on how bike connections are made is needed in the SDEIS. We need a clear, safe, easily navigable path from the south side of 520 on Montlake Boulevard, all the way up to the Burke-Gillman and back again, with the ability to get on and off the new 520 bike path.

I-309-008

5. There are conflicting statements in the SDEIS concerning the ability for Eastbound commuters to board busses at the bus stop near the onramp for East 520. Page 5-22 states "Access to SR 520 bus service in the Montlake interchange area would be reduced, and transit riders that currently use the Montlake Freeway Transit Station would be required to use bus service that operates directly between the Eastside and the University District and light rail between downtown Seattle and the Montlake Triangle." Page 5-23 states "With

HOV lanes, which provide express lane connectivity, or for a managed shoulder in the westbound direction, which is needed to address congestion.

While WSDOT believed that the design of the SR 520, I-5 to Medina project already accommodated potential future light rail, the agency worked with the City of Seattle and Sound Transit to identify changes that would enhance the corridor's rail compatibility. The Preferred Alternative reflects these design changes and allows for two potential future rail options as discussed in Chapter 2 of the Final EIS. Please also see the responses to comments from the City of Seattle Mayor's Office, in Item L-007.

I-309-003

With the Preferred Alternative, a transit/HOV direct-access ramp would be provided from southbound Montlake Boulevard to eastbound SR 520 via the Montlake lid, rather than including an HOV bypass lane in the eastbound loop ramp. See Chapter 2 of the Final EIS for a description of the Preferred Alternative.

I-309-004

In response to community interests expressed during public review of the SDEIS, the SR 520 corridor between I-5 and the Montlake area would operate as a boulevard or parkway with median plantings and a posted speed limit of 45 miles per hour. To support the boulevard concept, the width of the inside shoulders in this section of SR 520 would be narrowed from 4 feet to 2 feet, and the width of the outside shoulders would be reduced from 10 feet to 8 feet.

Once completed, the SR 520, I-5 to Medina project will improve noise and air quality in the project area. For example, the Preferred Alternative includes a number of noise reduction strategies such as 4 foot concrete traffic barriers coated with noise-absorptive coating, reducing the speed

I-309-008 Option A, riders could board an eastbound bus at the traffic island located at the entrance to the eastbound SR 520 on-ramp or at the Montlake Triangle, and, if required, transfer at Evergreen Point Freeway Transit Station." Please clarify the plans. If direct access to SR 520 buses at the on ramp is not allowed, this poses a problem for the many Eastbound commuters who live south of 520. One of the main concerns for commuters is predictability - if they leave their home at a certain time, they can expect to be at their office at a certain time. By forcing these commuters to travel up to Pacific to catch the bus to cross the lake, they not only need to cross one drawbridge while walking/cycling Northbound, but they then to cross another drawbridge while traveling on the bus Southbound to get on 520. Drawbridges go up and down and stop pedestrian and vehicle traffic, sometimes at unpredictable times. Not only have we added 10 minutes more walking and 5 minutes more bus riding time to their commute, commuters are now susceptible to two unpredictable draw bridge openings. Instead of forcing Montlake, Madison Park, Madrona, Central District, and North Capitol Hill commuters to travel to Pacific, allow boarding of some set of 520 Eastbound buses at the top of the East 520 on ramp.

I-309-009 6. It is important the pedestrians and cyclists are able to safely cross 520 during the entire construction period. A statement to this effect is in the SDEIS, on page 6-12, and it is very much appreciated. For their health, it is critical that air quality be maintained at acceptable levels throughout the entire construction period. As people will be coming into close proximity with construction activities at choke points such as the 520 crossing, monitoring and reporting of air quality should be a part of the construction plan. Monitoring and reporting should be provided by an independent party, not under contract by the general contractors.

I-309-010 7. Lids should be considered an integral part of the redesign of the Montlake and other interchanges. Under the phased implementation plan, the lids should not be deferred if the roadways in proximity to the lids are being rebuilt. In the case of the Montlake interchange, the lid is designed to help mitigate the extra traffic flowing in/out and under this interchange, and it is unacceptable to rebuild the interchange without the associated lid.

I-309-011 8. The bike lane is a welcome addition to the 520 bridge, and can help relieve traffic congestion. If a phased implementation is used we should create the bike lane across the lake and connect the bike lane on both ends of the bridge with paved ramps that connect to existing streets or bike trails. On the Westside, cyclists are already very familiar with the area around MOHAI, as this is part of the Lake Washington Loop bike route, or the bike lane could be reached from Marsh or Foster Islands, until the rebuild of the Montlake interchange and lid is complete.

I-309-012 9. Why was the air quality at the intersection of Montlake Boulevard and Lake Washington Boulevard not modeled? There are homes and businesses close to this intersection, commuters who will use the bus stops on either side of

limit through the Portage Bay area to 45 mph, encapsulating expansion joints, and using noise-absorptive materials around the Montlake and 10th Avenue East/Delmar Drive East lid portals. WSDOT will continue to consider other noise reduction methods as design development progresses.

The lids included with the project are designed to connect previously bisected communities and include improvements to the pedestrian and bicycle environment. Please see Chapter 7 of the Final Transportation Discipline Report for more information on nonmotorized transportation effects with the project (Attachment 7 to the Final EIS). Also, see the Visual Quality and Aesthetics Discipline Report Addendum for information regarding views and other visual quality effects with the Preferred Alternative (Attachment 7 to the Final EIS).

I-309-005

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. Refer to Chapters 7 and 8 of the Final Transportation Discipline Report for a description of pedestrian, bicycle, and transit connection improvements and their effects on users in the Montlake interchange area. The Preferred Alternative and its design refinements were developed in coordination with the University of Washington, King County Metro, Sound Transit, and the City of Seattle as part of the ESSB 6392 process. WSDOT will continue to coordinate with these agencies to ensure that improvements made as part of the SR 520, I-5 to Medina Project are compatible with other existing and planned local and regional facilities.

I-309-006

Since publication of the SDEIS, WSDOT has identified a Preferred

I-309-012 Montlake Boulevard on the lid, as well as pedestrians and cyclists traveling north and south across 520. With the many lanes of traffic roaring nearby, we should model the air quality at this intersection.

I-309-013 10. Having to make a choice between two bad options, we favor the addition of Arboreteum on and off ramps. Ideally, as many will argue, we would not have traffic flowing through the Arboreteum as it disrupts this beautiful park and makes for a less enjoyable and safe experience, not to mention doing harm to the environment. However, if we remove the ramps entirely, that traffic will be forced on to Montlake Boulevard, impinging further on the considerable surface traffic that relies on this corridor to travel north-south in the city, or worse traffic will start to use side streets. The ramps proposed with Option A+, that bisect the Montlake Lid and deposit cars on to Lake Washington Boulevard directly in front of Montlake homes, do harm to the neighborhood and miss an opportunity to create a larger green space for the lid. Better design alternatives must be explored. Whatever the final design is, it must adhere to the "do no harm" principle, both for the neighborhood and the Arboretum. It must not appreciably increase traffic volumes or congestion on existing neighborhood streets, and it must discourage cut-through traffic.

I-309-014 11. The proposed construction, with a duration of up to 78 months and an average of 13 to 50 truckloads per day and a peak of 120 to 300 truckloads per day on East Shelby, East Hamlin Streets and Montlake Boulevard, will severely and negatively impact the neighborhood's access to their own homes. For the Portage Bay Bridge construction, with a duration of 72 months, an average of 11 to 12 truckloads per day and a peak of 50 truckloads per day traveling through the community business district on 24TH Ave and turning on Boyer past the Children's Medical Center and the St Demetrious church, the impact could cause the businesses to fail financially, access to the medical center to be conflicted, and the religious activities at the church that is listed as eligible for national historic registration to be severely impacted. Also, 70-foot truck/trailer assemblies will not be able to turn onto Boyer Avenue from 24TH Avenue. A basic recommendation to mitigate the above impacts is to pursue the use of barges on conveyor systems on Lake Washington and Portage Bay to transport supplies, equipment and debris instead of using trucks.

I-309-015 12. We strongly oppose the construction of a second bascule bridge over the ship canal parallel to the historic Montlake Bridge. This will have a devastating impact on the Historic Montlake District through the taking of historic homes, and the degradation of the area around the remaining homes.

I-309-016 13. Please clarify the need for a road across 520 at 24th Ave E. Obviously MOHAI uses this road today, as do many cyclists. But with MOHAI leaving, is there a need for vehicular travel across the lid here? I believe a pedestrian/cyclist trail would suffice, leading to greater safety on the lid. Service

Alternative that includes a full lid from Montlake Boulevard to beyond 24th Avenue E near the Lake Washington shoreline. The intent is to provide greater pedestrian amenity in the central part of the Montlake neighborhood while simultaneously providing a better location and environment for the regional bus stops incorporated in the transit/HOV direct access ramps. The lid would function as a vehicle and pedestrian crossing, a landscaped area, and open space. The revised and expanded Montlake lid would improve bicycle and pedestrian connectivity across SR 520, reduce crossing distance for many pedestrians, and improve pedestrian safety. See Chapter 2 of the Final EIS for further information.

I-309-007

The Preferred Alternative, which is similar to Option A but includes a number of design refinements that minimize the effects presented in the SDEIS, and respond to comments made on the SDEIS and to WSDOT's work with many project stakeholders under Engrossed Substitute Senate Bill (ESSB) 6392. In accordance with the requirements of ESSB 6392, WSDOT has worked collaboratively with the Seattle Department of Transportation, the City of Seattle Pedestrian Advisory Board, and the Seattle Bicycle Advisory Board to develop design refinements for bicycle and pedestrian facilities. The resulting design refinements are described in the ESSB 6392: Design Refinements and Transit Connections Workgroup Recommendations Report. Bicycle and pedestrian connections are described in Chapter 2 of the Final EIS; their effects are described in Chapter 7 of the Final Transportation Discipline Report and in the Recreation Discipline Report Addendum (both in Attachment 7 to the Final EIS).

I-309-008

In an effort to improve the SR 520 I-5 to Medina Project's transit functionality and future compatibility, several design modifications were developed for the Preferred Alternative. The Preferred Alternative is a

I-309-016

vehicles could still reach the water treatment facilities from Hamlin and Shelby streets.

design that includes several transit specific features such as the following:

- Rail compatible for several potential rail alignments
- Transit stop on the new Montlake lid
- Full SR 520 bus access to Montlake lid transit stop during off-peak hours
- HOV lanes on Montlake Boulevard
- Transit signal priority compatible

These options were developed and refined through the 6392 workgroup process that included stakeholders from the State, City of Seattle, University of Washington, and the transit agencies.

I-309-009

A quantitative analysis of construction air quality effects, including diesel exhaust from construction equipment and hauling, fugitive dust from demolition and site grading, emissions associated with workers' commutes, and other construction-related air quality concerns, is included in the Air Quality Discipline Report Addendum and Errata. During construction, best management practices would be used to minimize construction emissions. WSDOT will comply with the procedures outlined in the Memorandum of Agreement between WSDOT and the PSCAA for controlling fugitive dust. Federal regulations require the use of ultra-low-sulfur diesel fuel in on-road trucks, and regulations that took effect in 2010 require the use of ultra-low-sulfur diesel fuel for construction equipment. See the Mitigation section of the Air Quality Discipline Report Addendum for further discussion.

I-309-010

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. As discussed in Section 2.8 of this Final EIS, 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 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. However, the lids are integral to the project design and would be constructed at the same time as the section of the SR 520 corridor in which they are located (e.g., the Montlake lid would be completed at the same time as the Montlake interchange improvements). This was true for the Phased Implementation Scenario as well. WSDOT has never proposed to defer the lids until after completion of the SR 520 roadway improvements. See Chapter 3 of the Final EIS for a discussion of construction sequencing with the Preferred Alternative.

I-309-011

See the response to I-309-010 regarding the Phased Implementation Scenario.

I-309-012

The reason for not studying local air quality effects at this intersection is documented on pages 24 through 25 of the Air Quality Discipline Report (Attachment 7 to the SDEIS). In summary, a screening analysis was conducted to determine the five worst-case intersections. Those intersections were modeled, and it was assumed that if the modeled intersections do not cause a violation of the NAAQS, then the other

intersections in the study area also would not. The Air Quality Discipline Report Addendum (Attachment 7 to the Final EIS) confirms that this intersection is also not expected to exceed the CO NAAQS under the Preferred Alternative.

I-309-013

The Preferred Alternative would not include construction of any new ramps in the Arboretum, and would remove both the existing Lake Washington Boulevard ramps and the R.H. Thomson Expressway ramps. Access to Lake Washington Boulevard by westbound SR 520 traffic would be moved to a new intersection located on the Montlake Boulevard lid at 24th Avenue East. Because the Lake Washington Boulevard ramps already exist, none of the alternatives or options evaluated in the SDEIS showed “greatly increased” traffic on Lake Washington Boulevard when compared with the No Build Alternative. The Preferred Alternative would reduce average traffic volumes in 2030 on Lake Washington Boulevard in the Arboretum compared to the No Build Alternative. Under the Preferred Alternative in 2030, a.m. peak hour volumes on Lake Washington Boulevard through the Arboretum would be 1,330 vehicles per hour with the Preferred Alternative, compared to 1,950 vehicles per hour with the No Build Alternative. P.m. peak hour volumes would be 1,410 vehicles per hour compared to 1,730 with the No Build Alternative.

I-309-014

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.

East Shelby and East Hamlin streets 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. 24th Avenue East (south of SR 520), and the southern portion of Boyer Avenue East (south of East Lynn Street) are not identified as potential haul routes in the Final EIS for any of the alternatives or design options. The revised potential haul routes are anticipated to minimize disruption to adjacent communities and community facilities, including the Boyer Children's Clinic and St. Demetrios Church. Please see Chapter 10 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for updated haul route information.

As discussed in the SDEIS, and reiterated in the Final EIS, unless otherwise noted in the Land Use, Economics, and Relocations analysis, access to local businesses within the project limits of construction would be maintained during construction, and WSDOT would coordinate with local businesses and facilities regarding any access disruptions that could occur. The Section 106 Programmatic Agreement (Attachment 9 to the Final EIS)and the associated Community Construction Management Plan (outlined in Attachment 9 to the Final EIS) address construction management and mitigation associated with effects to Saint Demetrios Church.

I-309-015

Through the project's Section 106 consultation process, WSDOT has engaged in negotiations with the Montlake Historic District and the owners of historic properties adjacent to the proposed new bascule bridge to identify ways to minimize and mitigate for the effect of the new structure. The negotiations allowed property owners to express their concerns and assisted WSDOT in identifying effective avoidance, minimization and mitigation for this impact. Stipulations such as installation of vegetative buffers and context-sensitive bridge design are provided in the Section 106 Programmatic Agreement (Attachment 9 to the Final EIS) and would ensure mitigation that the proximity of the new bascule bridge to Montlake Historic District does not diminish the integrity of the historic district.

I-309-016

Traffic movements along 24th Avenue East will not include traffic movements to East Hamlin and East Shelby street. Roadway improvements provided in this area will be similar to existing conditions today, except that instead of providing access to MOHAI, northbound access along 24th Avenue East from the new lid will be to the new parking lot at East Montlake Park only. East Hamlin and East Shelby streets will not become access streets to Montlake Boulevard from Lake Washington Boulevard.