

From: [Dinny Polson](#)
To: [Ziegler, Jennifer; sally.clark@seattle.gov; richard.conlin@seattle.gov; david.della@seattle.gov; jan.drago@seattle.gov; jean.godden@seattle.gov; nick.licata@seattle.gov; richard.mciver@seattle.gov; tom.rasmussen@seattle.gov; peter.steinbrueck@seattle.gov; SR520 DEIS Comments;](#)
CC:
Subject: FW: URGENT NEED FOR YOU TO COMMENT TO WSDOT AND THE SEATTLE CITY COUNCIL ON THE SR520 ALTERNATIVES-HERE ARE SOME IDEAS
Date: Monday, October 16, 2006 12:59:01 PM
Attachments:

COMMENTS TO WSDOT AND THE SEATTLE CITY COUNCIL ON THE SR520 ALTERNATIVES—HERE ARE SOME IDEAS

Following are some ideas for public comment, offered by the No Expansion of SR520 Citizens Coalition

- I-0989-001** | The EIS shows that because of wider lanes and shoulders, and improved connecting ramps, a four-lane SR520 would accommodate more traffic than the current bridge, but not be as wide or destructive as the six lane proposals. The four-lane alternative has not been given its due. Once it is examined carefully, it is seen as a better balance than any of the six-lane alternatives.
- I-0989-002** | The EIS does not consider the SR520 alternatives impacts on global warming. The City of Seattle's recent blue ribbon commission report on global warming warns that increased driving is our region's largest single contribution to global warming. Increasing the number of SR520 bridge traffic lanes will cause more driving, and hence produce more greenhouse gases. In contrast, keeping SR520 at four lanes is an important step to limiting our region's impact on global warming.

I-0989-001
Comment Summary:
4-Lane Alternative

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

I-0989-002
Comment Summary:
Energy and Greenhouse Gases

Response:
See Section 14.0 of the 2006 Draft EIS Comment Response Report.

I-0989-003 | The EIS fails to respond to the City of Seattle’s resolution 30777, which requested that WSDOT “develop policies that prevent the conversion of HOV lanes and rapid transit lanes to general purpose traffic,” and that it “design safety shoulders so that future conversion to traffic lanes is not feasible.” The fact is that, throughout the country, HOV and transit lanes have, once built (and sometimes even on the day that they opened) repeatedly been converted to general purpose lanes; and highway shoulders have been converted to traffic lanes (east of the Lake, the SR520 shoulders have for years been opened to traffic). Without measures to prevent such conversions, the SR-520 traffic models and the environmental analysis that depend on them are not worth the paper they are written on, because once built, SR-520 is likely to have much more traffic than was promised in the EIS.

I-0989-004 | Whereas the six-lane alternatives are shown with lids at Montlake and Roanoke, the four-lane alternative is shown without these lids, and hence the EIS actually claims that four lanes are noisier than six. WSDOT engineers concede that it would be entirely feasible to put these same lids on the four-lane alternative, but unfortunately the EIS does not do so. The EIS should re-analyze the four-lane alternative with the lids, because to do so would show that its noise impacts would be lower than for any of the six-lane alternatives. The EIS thus did not respond adequately to the City of Seattle’s resolution 30777 in its request that WSDOT “pursue all possible measures that promote neighborhood livability with the 4-lane option under study by WSDOT as well as the 6-lane option.”

I-0989-005 | The EIS analysis fails to examine most of the noise impacts throughout the corridor. This is because it considers only noise impacts of 65 decibels or higher, and only at the first floor—even though many homes, businesses, schools, etc. will suffer 65-decibel noise on upper floors, and many others will experience an increase in noise, even if the increase does not reach the 65-decibel level. WSDOT defends this omission on the grounds that the federal government requires noise mitigation only at or above 65 decibels, and only on the first floor. But note that, as federal noise mitigation is not allowed above the first floor, or for noise below 65 decibels, it is all the more important to consider the full noise impacts of the various alternatives, because each alternative brings with it a certain level of noise that, because of the federal restrictions, cannot be mitigated. We must not choose an alternative whose noise impacts are unacceptable yet cannot be mitigated. When a serious and careful comparison of the noise impacts of the six-lane alternatives versus the four-lane alternative has been done, and it will show that the six lane alternatives will cause more 65+ decibel noise above the first floor than the four-lane alternative. Also, for noise impacts under 65 decibels, the six-lane alternatives will cause more noise increases for more people than the four-lane alternatives. The higher noise from the six-lane alternative than the four-lane alternative will be felt by all neighborhoods that now experience noise from SR520, including not only Montlake, Portage Bay/Roanoke Park, Capitol Hill and Eastlake, but also Madison Park, Laurelhurst, and the Eastside neighborhoods.

I-0989-006 | WSDOT has failed to present a “congestion pricing” toll level that would ensure free flow at rush hour for the four-lane alternative. Its grounds are that, because there would be no toll on the I-90 bridge, I-5 would become clogged as drivers take the I-90 crossing. In fact, a rush-hour toll on both the SR-520 and I-90 bridges would manage congestion very well, as has been shown by studies already conducted by WSDOT and the Puget Sound Regional Council. The Federal

I-0989-003

Comment Summary:

Regional Land Use and Transportation Planning

Response:

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

I-0989-004

Comment Summary:

4-Lane Alternative

Response:

See Section 2.0 of the 2006 Draft EIS Comment Response Report.

I-0989-005

Comment Summary:

Noise (Methodology)

Response:

See Section 12.1 of the 2006 Draft EIS Comment Response Report.

I-0989-006

Comment Summary:

4-Lane Alternative

Response:

See Section 2.0 of the 2006 Draft EIS Comment Response Report.

I-0989-006 | Highway Administration already recognizes SR-520 and I-90 as a single corridor, and for the purposes of analyzing SR-520 tolls, WSDOT's EIS should have done so as well. The SR520 EIS should study the four-lane alternative with congestion pricing tools on both SR-520 and I-90.

I-0989-007 | Of the two tolling alternatives in the EIS, the designed to maximize revenue would have divert WSDOT from a socially optimal alternative. The consequence would be that drivers would pay tolls at all hours of the day, yet at rush hour they would not pay a toll that is high enough to ensure a free-flowing bridge. In contrast, the "congestion pricing" alternative that was not studied in the EIS could provide a lower or no toll during much of the day, but would during rush hour provide a toll high enough to ensure a free-flowing bridge, even with the four-lane alternative. If WSDOT chooses the tolling alternative to maximize revenue, it fall into a pattern not unlike Robert Moses did in New York—building highways to bring in more revenue, not for the public interest. Choosing this tolling alternative would cause WSDOT to overbuild SR-520 with one of the six-lane alternatives, even though the four-lane would cost much less to build (\$800 million less than the base six-lane, more than \$1 billion less than the six-lane with the Pacific Street Interchange. With its appetite for more toll revenue and more construction, WSDOT will choose to overlook that the four-lane alternative would cause far less environmental and neighborhood damage, and far less disruption during its fewer years of construction.

I-0989-008 | UW, and Arboretum, and most neighborhoods oppose the Pacific Street Interchange. On August 11, 2006, eight stakeholders provided to the City the following statement:

"The organizations that we represent are opposed to the so-called Pacific Street Interchange proposal because it is overly large and expensive, and has unacceptable impacts on the Arboretum and its wetlands, Union Bay, the University of Washington, and the surrounding neighborhoods. Please include this statement in the body of the SR520 Seattle Advisory Committee report."

Jean Amick, Laurelhurst Community Council
Lisa Anderson, Madison Park Community Council
Matt Fox, University District Community Council President
Louis Hoffer, Broadmoor Homeowners' Association
Larry Sinnott, Ravenna-Bryant Community Association
Carsten Stinn, Eastlake Community Council President
Theresa Doherty, University of Washington Assistant Vice President
Fred Hoyt, University of Washington Botanical Gardens
Angela Belbeck, Seattle Board of Park Commissioners

The Pacific Street Interchange is ill-named. In fact it would straddle Union Bay and MarshIsland.

Description of the Pacific Street Interchange as being community-generated are inaccurate. In fact, an interchange very similar to the Pacific Street Interchange was designed by WSDOT in the mid 1960s (forty years ago) as a part of what was then to be called the R.H.

I-0989-007

Comment Summary:

Tolling Scenarios, Pricing, and Revenue

Response:

See Section 3.3 of the 2006 Draft EIS Comment Response Report.

I-0989-008

Comment Summary:

Pacific Street Interchange Option

Response:

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

I-0989-008 | Thompson Expressway. The interchange, and the associated expressway, were rejected by the voters of the City of Seattle at that time. The only real difference between what was rejected in the 1960s and what is proposed now is that the original WSDOT design would have been partly underwater.