

**From:** [Wknedlik@aol.com](mailto:Wknedlik@aol.com)  
**To:** [SR 520 DEIS Comments](#);  
**CC:** [Milton, John](#);  
**Subject:** Comments on DEIS for the SR 520 Bridge Replacement and HOV Project  
**Date:** Tuesday, October 31, 2006 9:36:31 PM  
**Attachments:**

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Mr. Paul Krueger:

I-1044-001

The period for commenting on the Draft Environmental Impact Statement for the SR 520 Bridge Replacement and HOV Project was appropriately extended to precisely midnight, on Halloween, because that document represents the genuine nightmare resulting when political correctness and related deal-cutting by politicians are dressed up to masquerade as environmental evaluations and as associated analyses, and when a "nominal" DEIS substitutes deliberate distortions, or at least accommodations of same, by a transportation department that directly accedes to having its quintessential role therein reduced to what it terms "the nominal lead agency," while squarely acknowledging that it remains fully "responsible for complying with the duties of the lead agency under SEPA rules," at page 1-14, but then regretfully fails to do so, in numerous particulars, as ably identified by comments of James W. MacIsaac, P.E., dated October 31, 2006, as well as by further fact-based submissions, including that made by the Eastside Transportation Association.

Simply put, this DEIS' dimensions are impressive volumetrically, with one volume piled on another, but the resultant coach thus fashioned from paper affords little substantive capacity and delivers still-less intellectual candor, which is not only measurable in the magnitude of a wizened seed, but which also repeatedly appears, in texture, to be a sadly squishy squash well on its way to pumpkin putrefaction, even before the clock strikes twelve, as informed comments reveal its designs to disguise a haunting lack of congestion relief, either as an end or as means, and thereby to implicate intentional aiding and abetting for Sound Transit's spectral efforts to extend less-than-nothing delivered by that regional transit agency for \$6 billion, to date, by devilish distortions of the SR 520 Bridge Replacement and HOV Project, through its bogus co-lead role, in order to grab at least half of that replacement facility without a contribution of one penny to its multibillion costs.

**I-1044-001**

**Comment Summary:**

Format and Content

**Response:**

See Section 23.1 of the 2006 Draft EIS Comment Response Report.

**I-1044-002** | The SR 520 Users Coalition endorses and incorporates above-referenced comments by James W. MacIsaac, P.E., on traffic analysis and on congestion-related issues; reserves judgment as to certain other matters stated therein; and points out that our analysis to this Halloween night thus far suggests that environmental benefits from congestion relief under the Hybrid 6/8-lane proposal therein are greater for residents both of the Montlake community and also of the greater eastside than outlined by Mr. MacIsaac, and that environmental detriments from four-and-six-lane alternatives, including higher tolls than are required with the Hybrid, radiate northward to the SR 522 corridor in a fashion that would devastate mobility in Lake Forest Park, Kenmore and Bothell, and that would extend major harms to Woodinville, Monroe and beyond to towns on SR 2 and on SR 9, as well as to additional highways and roads.

**I-1044-003** | The SR 520 Users Coalition points out that the DEIS does **not** comply with WAC 197-11-055(2), in key respects, largely because Sound Transit, as its co-lead agency, has not fulfilled its central planning obligations to develop a "low capital option" (under RCW 81.104.100) and additional elements required for "Financial responsibility" (under RCW 81.104.130), *inter alia*, thus making it impossible for the Puget Sound Regional Council to perform its statutorily required "least cost planning" duties (under RCW 47.80.030[1]), and therefore rendering the DEIS legally premature since the current juncture is, factually and legally, well prior to "the earliest possible point in the planning and decision-making process, when the principal features of a proposal and its environmental impacts can be reasonably identified," as is mandated explicitly by key terms of WAC 197-11-055 (2). Critically, compliance with explicit statutory obligations by the co-lead agency herein and by PSRC would yield, of necessity, support for the Hybrid option omitted either in order or else so as to preclude any genuine analysis of real alternatives.

**I-1044-004** | The SR 520 Users Coalition further points out both that the DEIS does **not** adequately address impacts on freight movement in the SR 520 corridor, and also that WSDOT lacks the capacity to do so, at present, because instruments available to WSDOT for measuring local freight traffic, accurately, are wholly inadequate for supplying reliable information (as was specifically reported to PSRC's Regional Freight Panel, at its organizational meeting last month, by Barbara Ivanov, WSDOT Freight Strategy and Policy Director).

**I-1044-005** | Lacking both analysis of congestion data (despite specific provision of same to WSDOT by the Eastside Transportation Association according to Mr. MacIsaac's above-noted comments), and lacking also statutorily required steps for establishing cost effectiveness (despite more-than-15 years in which Sound

#### **I-1044-002**

##### **Comment Summary:**

Methodology (Freeway)

##### **Response:**

See Section 5.1 of the 2006 Draft EIS Comment Response Report.

#### **I-1044-003**

##### **Comment Summary:**

Format and Content

##### **Response:**

See Section 23.1 of the 2006 Draft EIS Comment Response Report.

#### **I-1044-004**

##### **Comment Summary:**

Freight

##### **Response:**

See Section 5.4 of the 2006 Draft EIS Comment Response Report.

#### **I-1044-005**

##### **Comment Summary:**

Format and Content

##### **Response:**

See Section 23.1 of the 2006 Draft EIS Comment Response Report.

**I-1044-005** Transit could have complied with its patent statutory obligations under RCW 81.104.100 and under RCW 81.104.130, as was directly suggested to Gov. Christine Gregoire in correspondence dated October 20, 2006 by the Expert Review Panel which she appointed pursuant to RCW 81.104.110), and being unable to comply with baseline requirements of WAC 197-11-055 (as indicated hereinabove), and being otherwise highly defective (as to freight for key example), **this DEIS should be formally withdrawn**, until all requirements of state statutes have been fulfilled (completely), and until all further duties under state administrative law can be complied with (only thereafter).

**I-1044-006** Given WSDOT's documented disregard for quintessential congestion facts provided to project staff in reaching an outcome driven by politics and by deal-cutting -- as is strongly suggested by major evidence set forth in Mr. MacIsaac's comments and as further buttressed by information set out hereinabove -- available information implicates that intentional misfeasance in the preparation of this DEIS is more probably explanatory than simple incompetence in so doing.

However, whether political correctness and related deal-cutting by politicians, as dressed up to masquerade as environmental evaluations and associated analyses in the DEIS, are a part of a coordinated and concerted action to suppress critical congestion information, or are merely reflective of a common schema for gaming taxpayers, the end result is the same, in either case, with the nightmare that is the Draft Environmental Impact Statement for the SR 520 Bridge Replacement and HOV Project from disregard for hard facts, as supplied to WSDOT by Mr. MacIsaac and by others, over and over, and from promotion of phantasmagoria.

Sadly, after more-than-30 years of involvement with the SR 520 corridor now, it appears to me that this DEIS is merely the latest iteration of frightful efforts to keep citizens in the dark so as to undercut taxpayer trust, yet again, and to spook ballot-box support, both tonight and also *in futuro*.

Respectfully yours,

Will Knedlik, Chairman  
SR 520 Users Coalition  
425.822.1342

## **I-1044-006**

### **Comment Summary:**

Alternatives Development

### **Response:**

See Section 1.1 of the 2006 Draft EIS Comment Response Report.