



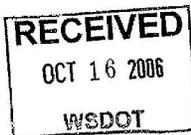
Richard Conlin
Seattle City Councilmember

October 13, 2006

Paul Krueger
Environmental Manager
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101

Dear Mr. Krueger,

I am writing to comment on the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement (DEIS) from my perspective as chair of the Seattle City Council's SR 520 Committee of the Whole. My comments will cover the size of the design alternatives, effects on parkland and wetlands, and impacts of construction.



L-006-001

Size of the Design Alternatives

Although the DEIS offers a significant amount of data on the impact of the various SR 520 design alternatives, the document fails to present a clear indication of the size of any of these alternatives. The DEIS only provides width measurements of the various design alternatives at mid-span on the floating bridge portion of the roadway. The document does not detail the significantly wider footprint of any of the alternatives for the sections located in the residential neighborhoods of Seattle. Further, the high-level visualizations of the proposed design alternatives do not adequately convey the size of these alternatives.

Data concerning the width of the design alternatives must be made available for the public to fully understand the impact of any of the design alternatives on the areas adjacent to the roadway. Absent such information, it is likely that many of the residents of the impacted communities, as well as the numerous citizens who take advantage of the parklands and wetlands surrounding the SR 520 corridor, will not gain a full appreciation of the impacts of any design alternative. This deficiency is true for both the 4-lane alternative, which is referred to as a "replacement" alternative in the DEIS, yet is significantly wider than the current roadway, and the 6-lane alternative, which can be as much as three-and-one-half times wider than the current facility under certain scenarios.

L-006-002

In addition to providing better information on the size of the future roadway, WSDOT should indicate how the overall size of the footprint could be reduced for the alternative chosen for inclusion in the final EIS. The design alternatives assume the maximum possible width of lanes and shoulders, as well as an increase in the numbers of lanes on exit and entrance ramps. Given the physical confines of the neighboring communities, WSDOT should analyze any possible way of reducing the size of the future roadway—yet it has not done so in the DEIS. In the final EIS,

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L-006-001

Comment Summary:

6-Lane Alternative

Response:

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

L-006-002

Comment Summary:

6-Lane Alternative

Response:

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

L-006-002 | WSDOT must indicate ways in which the size of the chosen alternative can be reduced. In doing so, WSDOT should also provide the potential consequences of the narrowing of roadway components on safety, traffic reliability, or other key factors.

L-006-003 | Effects on Parkland and Wetlands

One of the most significant drawbacks of any of the SR 520 design alternatives is the proposed acquisition of, or impact on, a significant amount of both parkland and wetlands. SR 520 travels through some of the most important wetland habitat in a metropolitan area in the United States. Any of the design alternatives would negatively impact this environmentally sensitive habitat. Although the ownership of these wetlands varies along the SR 520 corridor, the citizens who use this area for recreational purposes do not distinguish among property owners, and neither do the endangered wildlife species that frequent the area. Simply put, WSDOT must minimize the negative impacts on both wetlands and parklands to the greatest extent possible. WSDOT should ensure that there will be no net loss of any parkland or wetlands area, regardless of the current owner of the impacted land. This commitment would entail both the re-establishment of removed wetlands in the immediate vicinity of the SR 520 corridor, as well as the transfer to the City of Seattle of an amount of green space either equivalent to or greater than the total to be forfeited for the project.

L-006-004 | In addition to minimizing the permanent impact of any design alternative on parkland or wetlands in the project vicinity, WSDOT must provide citizens with as much access as possible to existing parkland and wetlands throughout the period of construction. Marsh Island, Foster Island, East Montlake Park, and the waterways surrounding these areas are some of the most heavily used green space in the City of Seattle, and it would be unacceptable to restrict access to these areas for a period of construction that could last for several years. The need to ensure continuous access to these recreation areas means that WSDOT must minimize or eliminate the use of parkland for temporary construction staging. WSDOT has indicated that East Montlake Park is one possible location for construction staging; however, given the already significant impacts to parkland throughout the SR 520 corridor to be created over the long run, WSDOT should remove from consideration construction staging that further limits access to existing recreational facilities in the short term.

L-006-005 | Impacts of Construction

As the DEIS makes clear, the SR 520 Project will be a significant intrusion into various Seattle neighborhoods during the many years that construction will take place. However, the DEIS does not give appreciation to the extent of the negative impacts of construction, nor does it adequately explain how WSDOT will lessen these hardships on these communities. WSDOT needs to more thoroughly estimate in the final EIS the full consequences that construction will have on the quality of life in the impacted neighborhoods, and it should clarify how it will fully mitigate these negative impacts. In particular, WSDOT should reconsider or better address the following elements of construction, which are highlighted in the DEIS:

L-006-003
Comment Summary:
Park Effects

Response:
See Section 9.1 of the 2006 Draft EIS Comment Response Report.

L-006-004
Comment Summary:
Park Effects

Response:
See Section 9.1 of the 2006 Draft EIS Comment Response Report.

L-006-005
Comment Summary:
Neighborhood Issues

Response:
See Section 7.1 of the 2006 Draft EIS Comment Response Report.

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L-006-006

- *Construction of Temporary Work Bridges.* Although the proposed temporary work bridges would enable WSDOT to rebuild SR 520 while maintaining the existing traffic capacity, these temporary work bridges would cause the SR 520 roadway to further intrude into surrounding neighborhoods and green space. WSDOT should provide an analysis of how long construction would last under scenarios that would narrow these work bridges or eliminate their utilization.

L-006-007

- *Closure of Lake Washington Boulevard Ramps.* The DEIS indicates that the Lake Washington Boulevard Ramps would be closed during construction for between three and five years. The closure of these access points to SR 520 would likely create an untenable level of congestion at the Montlake Boulevard interchange, which is already heavily congested during peak travel hours—as the DEIS clearly indicates. Further, the extra traffic forced through the Montlake Boulevard interchange would undoubtedly increase congestion on non-arterial streets throughout the Montlake area, as commuters facing increased congestion would attempt to bypass backups on the arterial roadways. Heavier traffic on non-arterial roads would in turn have unacceptable quality-of-life impacts on the residents of these neighborhoods and would likely have detrimental safety consequences. WSDOT should either allow the Lake Washington Boulevard Ramps to continue to operate until the new ramps are constructed, or clearly indicate how both negative safety and traffic flow effects in the local neighborhoods would be minimized in the case the ramps are closed.

L-006-008

- *Impacts on University Medical Center.* Should the 6-lane Pacific Interchange option be chosen as the preferred alternative, WSDOT should develop a detailed plan specifically for mitigating the impacts of construction on the University Medical Center. The DEIS states that, under this design alternative, Pacific Street Northeast between the Medical Center's emergency entrance and Montlake Boulevard would be closed for up to one year. WSDOT needs to clearly indicate how it would ensure direct access to the Medical Center throughout the period of construction. Further, the DEIS indicates that construction could result in undesirable dust and noise impacts in the vicinity of the Medical Center, possibly impacting the health of the Medical Center's patients. If the Pacific Interchange option is selected as the preferred alternative, WSDOT should indicate how it will ensure that construction will have zero environmental impacts on the Medical Center throughout construction, given the deleterious consequences these effects can have on Medical Center patients.

L-006-009

- *Use of Local Streets for Construction Hauling.* The DEIS indicates that many local arterial and non-arterial streets throughout the Montlake, Roanoke/Portage Bay, North Capital Hill, University District, and Eastlake neighborhoods will be used for construction hauling. WSDOT must clarify which segments of the streets it expects to use for construction hauling. Streets such as Newton Street East and 11th Avenue East extend through various neighborhoods, and the DEIS is not clear on which segments it is considering for construction hauling. Even with such a clarification, WSDOT must narrow the list of streets it will use for hauling construction materials. It appears that WSDOT intends to use almost every local street in the vicinity of the SR 520 corridor for

L-006-006

Comment Summary:

Schedule

Response:

See Section 4.1 of the 2006 Draft EIS Comment Response Report.

L-006-007

Comment Summary:

Traffic Management (Construction)

Response:

See Section 4.2 of the 2006 Draft EIS Comment Response Report.

L-006-008

Comment Summary:

Pacific Street Interchange Option

Response:

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

L-006-009

Comment Summary:

Schedule

Response:

See Section 4.1 of the 2006 Draft EIS Comment Response Report.

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L-006-009

construction hauling. However, many of the streets listed in the DEIS are entirely residential. Routing up to 12 trucks per hour over these streets—up to one truck every 5 minutes over the course of many years—will be overly intrusive.

L-006-010

- *Inclusion of Eastlake as an Impacted Community.* Concerning the use of local streets for construction hauling, WSDOT has proposed using Boylston Avenue East and Eastlake Avenue East to such ends. Parts or all of these streets are located in the Eastlake neighborhood, yet the Eastlake neighborhood is not included as an impacted community in the DEIS. WSDOT must either incorporate Eastlake as an impacted community if it proposes using streets in this neighborhood for construction hauling, or it should eliminate consideration of such streets for these purposes.

L-006-011

- *Access to Parkland.* The DEIS does not indicate the extent to which access to the Arboretum, East Montlake Park, or currently accessible green space will be curtailed, if at all. For example, the DEIS does not specify whether the heavily used Foster Island trail passing underneath SR 520 will be open or closed during construction. As indicated earlier in this letter, WSDOT must ensure access to these valuable recreational areas to the greatest extent possible throughout the period of construction.

L-006-012

- *Possible Nighttime Work Variances.* The DEIS states that WSDOT may seek nighttime work variances to speed construction. Although nighttime variances may be acceptable in rural areas or commercial zones, the SR 520 corridor runs through a largely residential zone of Seattle. Nighttime work would create unacceptable noise and light pollution for the surrounding neighborhoods. WSDOT should remove consideration of nighttime work as part of its construction planning.

L-006-013

Because the various construction issues highlighted above can impact the length of construction, for the SR 520 project WSDOT should follow the example set by the Supplementary Draft Environmental Impact Statement for the Alaska Way Viaduct and Seawall Replacement Project by outlining various construction options for the design alternative chosen for the final EIS. These construction options would demonstrate how varying methods of mitigating the impact of construction on the neighboring communities would affect the length of construction.

Thank you for your consideration of these comments. I look forward to continue working with the SR 520 Team as this project moves forward.

Sincerely,



Richard Conlin, Chair, SR 520 Committee of the Whole
Seattle City Council

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L-006-010

Comment Summary:

Neighborhood Issues

Response:

See Section 7.1 of the 2006 Draft EIS Comment Response Report.

L-006-011

Comment Summary:

Park Effects

Response:

See Section 9.1 of the 2006 Draft EIS Comment Response Report.

L-006-012

Comment Summary:

Schedule

Response:

See Section 4.1 of the 2006 Draft EIS Comment Response Report.

L-006-013

Comment Summary:

Schedule

Response:

See Section 4.1 of the 2006 Draft EIS Comment Response Report.