

From: [Layne Cubell](#)
To: [SR 520 DEIS Comments:](#)
CC: [Karen Kiest; Guillermo Romano; Tom
Iurino:](#)
Subject: Seattle Design Commission letter
Date: Tuesday, October 31, 2006 4:30:27 PM
Attachments: [DC SR520 DEIS Final 103106.pdf](#)

Dear Mr. Krueger,

On behalf of the Seattle Design Commission, attached please find a comment letter on the SR-520 Bridge Replacement and HOV Project DEIS. We'll be sending a copy to you by US mail, as well, and to all parties copied on the letter via a separate email.

Sincerely,

Layne Cubell
Seattle Design Commission
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(206) 233-7911

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October 31, 2006

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

RE: Response to the Draft Environmental Impact Statement for the SR-520
Bridge Replacement and HOV Project

Dear Mr. Krueger:

The Seattle Design Commission appreciates the open and collaborative approach that WSDOT has taken on this project, applauds its strong cooperation with the City of Seattle to identify and address the local impacts that will result from this most significant project and takes seriously our charge to advise the City on its long term interests.

We have conducted a series of reviews of the SR-520 project in seven courtesy briefings over the past four years. Our comments on the DEIS are based on the formal actions that we took at those meetings. Our review of the DEIS document concentrates on the urban design implications for the City of Seattle contained in Section 5, "Detailed Comparison of Alternatives-Seattle", but we have also given a cursory look to other sections and also to Appendix S: Visual Quality and Aesthetics.

Key Recommendations:

- We feel strongly that new project cost estimates released last month by WSDOT must be clearly identified for each alternative and must factor into your own decision making. We think it is best to analyze the alternatives with this in mind as public funds are a finite resource. It is unrealistic to think that all of the mitigation measures will be funded.
- The final EIS needs to reframe the alternatives to allow a fair comparison between the 4-lane and 6-lane alternatives. Added amenities to mitigate environmental impacts are not included in the 4-lane alternative as they are in the 6-lane options. This is a real shortcoming of the DEIS. Given the budget challenges of the project and the likely need for severe value engineering, we think that all the options need to be evaluated on an even footing.

L-011-001

Comment Summary:

Project Costs

Response:

See Section 3.1 of the 2006 Draft EIS Comment Response Report.

L-011-002

Comment Summary:

4-Lane Alternative

Response:

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

L-011-003

- It is clear from the available information that the physical impacts on Seattle of any 6-lane option will be far greater than those of the 4-Lane Alternative. Therefore, we cannot support the 6-lane options presented as we remain solid in our concerns for: impacts on the University of Washington; impacts on the Arboretum and area wetlands; impacts to Seattle neighborhoods; and inherent conflicts with Seattle's global reputation as an environmental policy leader.

L-011-004

- The Preferred Alternative for SR-520 must duly consider the changing and highly integrated mix of land uses along the Seattle corridor. The DEIS examines impacts with existing uses only and overlooks planned future uses. Special consideration must be given to the UW's Long Term Physical Development Plan, the Arboretum's Master Plan, and Sound Transit's plans for the new Stadium Station.

L-011-005

- While we understand that the study is looking at selected options, the best mobility and urban design solutions might be found in a hybrid alternative that pulls together the fundamental merit of the 4-lane Alternative and the added benefits of the several 6-lane options. We hope that this type of resolution is not excluded in this process. Specifically, we recommend that any such alternative include: dedicated transit ramps at key junctures; lids that offer improved surface connections; a direct intermodal transportation connection at the University; and aggressive traffic management and congestion pricing tools. This alternative might also investigate depressing, stacking or layering the corridor through parts of Montlake and Portage Bay to minimize the roadway width.

Mobility - Vehicles, Transit, Bicycles and Pedestrians

L-011-006

- It seems to us that the goal of the project should be to increase overall mobility with the least environmental impact possible. While various aspects of the transportation system are studied in the DEIS, it is not easy to understand the mobility impacts of each alternative. Although much of the information is embedded in the DEIS it needs to be compiled and reorganized so it may be compared in a clearer way.

L-011-007

- The Sound Transit Light Rail project represents the region's largest investment in rapid mass transit and the first phase of the project will terminate just to the north of SR-520. Regardless of which alternative is selected, we think it is critical that a direct connection between the two projects be made. The Pacific Interchange option offers the best such connection, but it is not clear how bus/train transfers will be accommodated in a very busy and complex intersection. A concerted planning effort for a true multi-modal transit center needs to drive the Pacific Interchange scheme or any scheme that promotes improved intermodal connections.

L-011-008

- For optimal mobility, the highway infrastructure must work well as a system of connected roadways. I-5 has insufficient highway capacity to effectively handle 520 traffic flows with either of the 6-lane options. Improvements to this critical connection point must be articulated in the FEIS.

L-011-003

Comment Summary:

6-Lane Alternative

Response:

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

L-011-004

Comment Summary:

Indirect and Cumulative Effects Methods of Analysis

Response:

See Section 20.1 of the 2006 Draft EIS Comment Response Report.

L-011-005

Comment Summary:

4-Lane Alternative

Response:

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

L-011-006

Comment Summary:

Format and Content

Response:

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

L-011-007

Comment Summary:

Pacific Street Interchange Option

- L-011-009
- It appears that all alternatives make huge improvements to cross-lake bicycle and pedestrian mobility, which we applaud. Similarly, it appears that north-south bicycle and pedestrian access is improved with all alternatives, however it is not clear in the DEIS how connections are made to the larger existing pedestrian and bicycle network in the city. This point is critical and needs to be expanded in the FEIS.

Noise

- L-011-010
- Lids themselves, if well designed, could work effectively to mitigate noise. The I-90 lid over Mercer Island offers a good example. The noise impacts of the 4-lane alternative appear the greatest, but it is evaluated without lids. The FEIS should compare how the 4-lane alternative and 6-lane options work with the same type of lids in place and then both should be evaluated without lids, as well.
 - Sound walls need to be assessed for optimal location based on noise impacts and community desire. In some cases, they may not be the optimal solution.

Visual Quality

- L-011-011
- We applaud the effort to look at aesthetics early on and commend the Corridor Aesthetics Handbook recently released. The Commission is most concerned with how the good thinking in this handbook gets applied to the actual design of the project. The recommendations contained in the handbook should be reinforced in the FEIS.
- L-011-012
- Sound walls should be used sparingly and need to be approached more aesthetically as design elements of the overall corridor. Their height, form and materials need to be refined from the early computer engineered images shown in the DEIS.
- L-011-013
- Exhibits 5-1 through 5-4 give a very good comparison of the visual impacts of the alternatives and options viewed from the Arboretum and Portage Bay. Given the current visual impact of SR-520 on the North Capitol Hill and Roanoke neighborhoods, similar visual simulations of the alternatives and options for those neighborhoods need to be included in the FEIS, as well. More attention should be given to views looking west along the corridor in this area.
- L-011-014
- We think the FEIS needs to more fully explore all options through visual simulation videos, much like the Viaduct project has recently done. These will be important to fully assess the impact on adjacent neighborhoods and should include realistic lighting, landscaping and signage conditions.

Environment and Recreation

- L-011-015
- The scale of both the over-water and over-wetland coverage through the north end of the Arboretum and Portage Bay for both 6-Lane options are of great concern because of the impacts on environmental habitat. Soils, water quality, shoreline vegetation and aquatic life all must be fully assessed and to the extent possible, loss of habitat must be mitigated.

Response:

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

L-011-008

Comment Summary:

Freeway Operations (I-5 Area)

Response:

See Section 5.2 of the 2006 Draft EIS Comment Response Report.

L-011-009

Comment Summary:

Bicycle/Pedestrian Path

Response:

See Section 2.3 of the 2006 Draft EIS Comment Response Report.

L-011-010

Comment Summary:

Noise (Methodology)

Response:

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

L-011-011

Comment Summary:

Context Sensitive Solutions

Response:

See Section 10.2 of the 2006 Draft EIS Comment Response Report.

L-011-016

- Also of great concern are the impacts on recreation sites. These same areas offer important walking, running and non-motorized boating access for citizens of the city. While both 6-lane options show significant impacts, the Pacific Interchange Option also impacts the UW Waterfront Activities Center. The spreadsheet shown in Exhibit 5-14 seems like an inadequate investigation of the physical, visual and noise impacts on nearby recreation areas.

L-011-017

- The DEIS indicates that all alternatives would decrease vehicle emissions because of improved mobility and increased travel speeds. This is admirable, given Seattle's (and Redmond's) commitment to reducing greenhouse gases through the Mayor's Climate Protection Agreement (MCPA). There are obvious positive impacts on the quality of life in the city if emissions are reduced. However, the projected reductions appear minimal and nowhere close to the goals of the MCPA. The FEIS needs to quantify the effect of each option on cumulative emissions throughout the city, not just within the corridor. If more vehicles are entering the city street grid what are the overall emissions impacts? Are there any ways in which the project could be modified to come closer to meeting the MCPA?

L-011-018

Summary

We fully recognize the need for compromise on this major regional transportation project. The Pacific Interchange option has generated a lot of media attention lately and certainly has its merits, but we remain concerned about its impacts and instead recommend honing a 4-Lane hybrid option that more fully meets the needs of Seattle's citizens.

We thank WSDOT for their willingness to work with the Seattle Design Commission and appreciate the legibility of the DEIS document. We look forward to continuing to work with WSDOT as this critical project moves from preliminary engineering through design and into construction.

Sincerely,



Karen Kiest
Chair

cc: Secretary Doug McDonald, WSDOT
Mayor Greg Nickels
Tim Ceis and Emelie East, Seattle Mayor's Office
Seattle City Council
Michael Fong and Casey Hanewall, Seattle City Council Central Staff
Grace Crumican, Bob Powers, Dave Allen, SDOT
Diane Sugimura and John Rahaim, DPI
Ken Bounds, Erin Devoto, Kevin Stoops, David Graves, Seattle Parks
Barb Wilson and Jerry Finrow, Seattle Planning Commission

L-011-012

Comment Summary:

Noise Walls (Aesthetics)

Response:

See Section 12.3 of the 2006 Draft EIS Comment Response Report.

L-011-013

Comment Summary:

Visual Quality Effects

Response:

See Section 10.1 of the 2006 Draft EIS Comment Response Report.

L-011-014

Comment Summary:

Visual Quality Effects

Response:

See Section 10.1 of the 2006 Draft EIS Comment Response Report.

L-011-015

Comment Summary:

Wildlife Effects

Response:

See Section 16.2 of the 2006 Draft EIS Comment Response Report.

L-011-016

Comment Summary:

Park Effects

Response:

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

L-011-017

Comment Summary:

Energy and Greenhouse Gases

Response:

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

L-011-018

Comment Summary:

4-Lane Alternative

Response:

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