

C-014-001

Comment Summary:

Pacific Street Interchange Option

Response:

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

From: [Jean Amick](#)
To: [Krueger, Paul W \(UCO\); SR 520 DEIS Comments;](#)
CC: [Joe Herrin;](#)
Subject: Fw: Comments from Laurelhurst
Date: Tuesday, October 31, 2006 5:20:14 PM
Attachments: [LCC3223SR520DEISComments.doc](#)

Dear Paul,
Here are the official 520 DEIS comments from Laurelhurst Community Club.
Please put into the comments' record - and can you please acknowledge that
you have received this letter?
Thank you,
Jean

October 31, 2006

Paul Krueger
Environmental Manager
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, Washington 98124-4025

RE: SR 520 Replacement and HOV Project, Comments on the DEIS

Dear Mr. Krueger:

The Laurelhurst Community Club offers the following comments on the Draft Environmental Impact Statement (DEIS) for the SR 520 Replacement and HOV Project. We attach and incorporate by reference the Laurelhurst position statement of September 11, 2006.

C-014-001 Arboretum: We are concerned about the impact of all of the proposed alternatives on the Washington Park Arboretum. All proposals would take Arboretum land, destroy valuable plantings and tree collections and destroy wetlands. In this regard, the Pacific Interchange alternative is particularly detrimental to the health and well-being of this treasured park setting that serves as a habitat for birds, wildlife and endangered species. As noted on page 4-41, the Pacific Interchange would fill .2 acres of wetlands and require a 5.3 acre buffer, as compared to the 2 acre buffer required under the four-lane option. The shading that would result from the Pacific Interchange option would amount to 7.8 acres of wetlands and a 1.3 acre buffer, as compared with the 4.5 acres of shading and 2.3 acres of buffer required by the four-lane option. The DEIS should study ways to minimize impacts to the Arboretum and preserve the beautiful and pristine open space to ensure no net impact. Further study of the

- C-014-001** pollution and noise that would result from the Pacific Interchange alternative and vehicle traffic through the Arboretum is necessary.
- C-014-002** Coordination with other planning efforts: On page 2-36, the DEIS recognizes that the University of Washington and the Washington Park Arboretum have adopted master plans that will affect development in the SR 520 project area. Both of these plans involved extensive public involvement over many years of preparation. How can implementation of these plans move forward with a new SR 520 bridge, particularly under the Pacific Interchange alternative? The DEIS does not adequately explain why little traffic increase is projected through the Arboretum along Lake Washington Boulevard in the Pacific Interchange Option.
- The DEIS does not discuss how the various options, especially the Pacific Interchange, would fit in with the goals and action items in the University Community Urban Plan. This neighborhood plan, developed over an extended period of time with involvement from the City and the University of Washington envisions restriction of vehicular traffic to a minimum, through such programs as U-Pass, and creation of a pedestrian-friendly environment. Building more lanes and the massive Pacific Interchange is contrary to the neighborhood plan. Analysis of the alternatives in light of neighborhood planning efforts should be undertaken.
- C-014-003** Air quality: As noted in the DEIS beginning on page 2-36, several air pollutants are associated with vehicle emissions from heavy traffic congestion in the project area. Due to violation of federal air quality standards in the 1990s, the U.S. Environmental Protection Agency designated the region as a “maintenance area” that requires extra care to prevent future violations and preparation of state implementation plan to meet and maintain compliance with air quality standards. The Puget Sound Regional Council has suggested that emissions of particulate matter will gradually increase between 2010 and 2030 as traffic volumes increase. A new SR 520 will add two more vehicle lanes thus many more vehicles—a major source of pollutants. Is creation of more traffic lanes into Seattle and the Puget Sound area counterproductive for the city’s anti-global warming efforts and pro-clean air efforts? Additional studies are necessary to determine that added vehicle trips through the Arboretum and the impact on the trees, plant collections and habitat.
- C-014-004** Wetlands: The DEIS does an excellent job in pointing out the importance of wetlands in providing economic and ecological benefits through a number of physical, chemical, biological and social functions, beginning on page 2-41. The problem with the DEIS and its technical appendices, however, is that the impacts of all of the alternatives, especially the Pacific Interchange option are minimized. Starting on page 5-43, the effects of the project on Seattle’s ecosystems are reviewed in a summary fashion. We agree with the University of Washington wetlands consultants that “several important analyses of environmental effects are either not performed, performed using questionable assumptions or inappropriate analyses, or some of the conclusions within

C-014-002

Comment Summary:

Pacific Street Interchange Option

Response:

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

C-014-003

Comment Summary:

Air Quality Analysis

Response:

See Section 13.1 of the 2006 Draft EIS Comment Response Report.

C-014-004

Comment Summary:

Wetland Regulations and Ratings

Response:

See Section 16.1 of the 2006 Draft EIS Comment Response Report.

C-014-004 the DEIS are based on analyses or data that are not provided within the DEIS or its Technical Appendices.”

Statements about the shading impacts on the wetlands are inconsistent and not substantiated by the scientific literature. In discussing the Union Bay wetlands, no citations are listed document the claims made in the DEIS.

C-014-005 Noise: On page 5-19, the DEIS states that the noise situation would improve substantially if either of the build alternatives were built. Applying noise abatement criteria, the DEIS states that the four-lane alternative would be noisier than the other options (other than the no build alternative). This statement ignores the possibility for lids to address noise issues. It also ignores noise under 66 decibels and above the first floor, both of which are worse with the six-lane alternatives. It defies logic to suggest that more vehicles will not result in more noise, or that Laurelhurst will not have noise impacts with a new six-lane alternative 400 feet closer on the north side. Further study and analysis is necessary in this regard. What will be the impact of increased noise on the University Medical Center?

C-014-006 Visual blight: The DEIS fails to adequately address the visual blight that would result with the Pacific Interchange alternative. For example, on page 6-1, it is stated that “changes in scale and appearance are expected to be somewhat noticeable from shoreline neighborhoods...but would not change the quality or character of those views...” We disagree and ask for further analysis. The proposed Pacific Interchange literally runs a string of concrete arches the length of a pristine natural area, destroying peace and quiet and views. The visuals from the Arboretum were not included in the DEIS and should have been, along with further study of the impacts.
Cost: The Pacific Interchange alternative is costly and there is no assurance that \$4.38 billion will be available to fund this option. The Governor’s Expert Review Panel agrees with this assessment. The four-lane alternative is considerably less expensive and a more fiscally sound approach. A thorough assessment of the costs of each alternative must be undertaken, including the costs associated with mitigation and a reassessment of issues relating to tolls (as explained below). WSDOT should study the possibility of scaling back the four-lane option by reducing the width of the lanes, shoulders and ramps, cutting the Portage Bay viaduct to its current four lanes, and making shoulders intermittent, rather than continuous and thus convertible to future traffic lanes.

C-014-007 Transit connections: On page 3-28, the DEIS incorrectly states that the Pacific Interchange option “would provide a more reliable transit connection to the Sound Transit University Link light rail station at Husky Stadium than the six-lane Alternative because buses coming from SR 520 to the Pacific Street bus stops would not be affected by congestion on Montlake Boulevard.” The problem is that no bus-to-rail transfer facility for bus riders traveling on SR 520 is proposed at the North Link Husky Stadium station. University of Washington transportation consultants state that it

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Comment Summary:

Noise (Methodology)

Response:

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

C-014-006

Comment Summary:

Pacific Street Interchange Option

Response:

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

C-014-007

Comment Summary:

Pacific Street Interchange Option

Response:

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

C-014-007 would be difficult to construct such a facility and they estimate that an additional 30-50 feet of right-of-way would be required along the east leg of the Montlake Boulevard and Pacific Street intersection. Costs of providing such transit connections should be incorporated in the DEIS and the budget modified to reflect the increased costs. An explanation as to the need for a transit connection should be provided in light of the East Link light rail.

C-014-008 Traffic: The DEIS includes many exhibits on pages 4-8 and 4-9 showing intersection levels of service on key arterials during morning and afternoon peak hours. The methodology for calculating the levels of service is not clearly outlined in the DEIS. The DEIS also does not indicate the backups that would result from downstream congestion and adjustments made, if any, to the calculated level of service. We agree with the University of Washington transportation consultants that "if adjustments were not adequately made to reflect the impacts of vehicle queues from the downstream intersections or traffic merge points, 2030 arterial intersection levels of service should in the DEIS are seriously understated. The DEIS should also have shown daily traffic volumes among the alternatives, rather than just during peak hours.

The DEIS also fails to show the impacts on Montlake Boulevard. The DEIS also that there would be no increase in traffic on Lake Washington Boulevard south of SR 520 under the Pacific Interchange alternative. There are no studies or no analyses to support this conclusion.

C-014-009 Impact of tolls: The DEIS fails to analyze the impact of tolls and the likelihood that single-occupant drivers will use routes other than SR 520 due to the toll. The toll for a one-way trip in 2006 dollars would be \$3.35 and a round trip would be \$6.70 per day. This will be a strong disincentive for drivers to use SR 520. The amount collected by tolls could be much less than projected for the four-lane alternative and both six-lane alternatives if drivers do not use SR 520. This means that the amount of the toll may have to be adjusted. The total cost of the project could be substantially higher if revenue from tolls does not meet projections in the DEIS. The DEIS should discuss the various possibilities. WSDOT should analyze the forecast traffic volumes with and without tolls and include an analysis of the probable shifts in traffic from SR 520 to I-90 and SR 522 due to the tolls.

Other tolling issues: On page 3-46, the DEIS notes that its analysis assumes that tolls would not be paid by transit vehicles, registered vanpools, carpools with three or more people or vehicles that use SR 520 without crossing the bridge. The DEIS goes on to state, however, that WSDOT policy on tolling may change in the future. Possible changes to the tolling policy should be analyzed to access revenue that would be raised and the true costs of each alternative.

The DEIS notes that tolls would be collected using an electronic toll collection system, rather than manual collection at a toll plaza, thus allowing traffic to flow freely across

C-014-008

Comment Summary:

Local Street Network

Response:

See Section 5.3 of the 2006 Draft EIS Comment Response Report.

C-014-009

Comment Summary:

Tolling Scenarios, Pricing, and Revenue

Response:

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

C-014-009 the bridge instead of stopping to pay at the beginning or the end. How will the occasional cars, nonlocal drivers, trucks and buses from in-state and out-of-state pay? The DEIS indicates that WSDOT would develop policies to address this. An analysis of how these users would be incorporated into the tolling system should be undertaken and an opportunity to comment allowed.

C-014-010 Removal of Aurora Borealis Sculptures: On page 3-47, the DEIS notes that the Aurora Borealis sculptures will be removed to accommodate the new highway and returned to the original donor. In 2001, the Laurelhurst Community Club studied the proposal from Max Gurvich to replace the two inoperative "Nellie Cornish" fountains near the western terminus of the SR 520 Bridge with kinetic art sculptures. Prior to that time, for eight years Mr. Gurvich paid for the bi-monthly maintenance of the fountains due to his deep commitment to aesthetics in our urban environment. Because of constant clogging and WSDOT's unwillingness to assume the maintenance costs, the fountains eventually became defunct in 1989. After over a year of planning involving WSDOT, structural engineers and installation contractors, Mr. Gurvich's artistic endeavor again brought beauty to surrounding communities and vehicles stuck in traffic on SR 520. After Mr. Gurvich's extraordinary efforts to address aesthetic issues and an alternative to the defunct fountains, it is not sufficient to merely state that WSDOT will simply give back the sculptures. A plan should be developed to preserve this important art.

Thank you for considering the comments of the Laurelhurst Community Club.

Sincerely,

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ENC: Laurelhurst Position Statement of September 11, 2006

Laurelhurst Community Club SR520 Position Statement
September 11, 2006

The Laurelhurst neighborhood supports the city's goal of reducing driving by promoting pedestrian, bicycle and mass-transit alternatives. We also support the city's goal of being a leader in environmental stewardship and economic

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Comment Summary:

Context Sensitive Solutions

Response:

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

viability.

Our community supports reconstruction of the four-lane SR520 bridge and supports enhancing mass-transit capacity through the corridor. We oppose adding single-occupancy vehicle capacity, which we believe is inherent in each of the 6-lane alternatives. The addition of traditional HOV lanes will by default add SOV capacity to the general-purpose lanes by removing carpool and bus traffic. While statistical analysis shows that buses will run freely along these new lanes, experiences along other regional corridors have shown otherwise. Additionally, transportation modeling suggests that the eventual load from new HOV lanes will require Interstate 5 to be widened, which is not in any future State plans. The LCC supports bus rapid-transit or railways in dedicated rights-of way without automobile access.

Inter-modal Connectivity

The LCC supports a well-designed inter-modal connection between SR520 mass-transit and Sound Transit serving the larger community of NE Seattle. Suggestions include a dedicated southbound HOV lane from NE 45th to the UW stadium station, allowing for increased direct bus service from critical points in NE Seattle.

Local Traffic Impacts

Traffic through the Montlake corridor must be improved by this project, not made worse! The state, city, Sound Transit, the U of W and other stakeholders must devise a satisfactory long-term solution to this bottleneck. This is a bigger issue than SR520 alone. The effects of allowing continued expansion of University Village, Magnuson Park, Children's Hospital, Talaris, the UW, multi-family and elder care institutions, etc. must all be taken as a whole and a comprehensive transportation vision be created for NE Seattle. The DEIS focuses on whether the interchanges near the UW hospital and Montlake will rate a 'D' or an 'F'. Neither is acceptable for such a cost.

Noise

We support utilization of state-of-the-art "quiet pavement" to reduce noise and we support a lower speed limit on SR520 to both reduce noise and improve safety.

Washington Park Arboretum

We support a "net-zero" impact to the arboretum and surrounding wetlands and 100% funding of the Arboretum master-plan as a mitigation measure of the project. Additionally, we support measures meant to discourage vehicular through-traffic in the Arboretum.

Project Scale

Our specific opposition to the Pacific Interchange Option has much to do with its immense scale and completely inappropriate location above native wetlands. A similar criticism could be levied against the 6-Lane Base Option and the huge swath of pavement it cuts through historic neighborhoods and Portage Bay.

We support minimizing the visual scale and the total impervious surface area required for the project. Specific suggestions include larger landscaped lids and the narrowing of traffic lanes and shoulders. These measures are only a start and do not go nearly far enough. Additional measures must be identified to reduce what are currently unacceptable visual and environmental impacts over our waterways and wetlands. Toward this end, we support a thorough feasibility study of the tunnel/tube concept by experts in the field.

Conclusion

This project is huge. Construction for this project, in tandem with Sound Transit, will place an almost impossible burden on our community during construction. These projects, along with the Viaduct, will have an enormous impact on what we become as a city and a region over the next 50 to 100 years.

We understand that regional politics suggest that we A) choose from the options we've been given and B) that we'd better choose from one of the 6-Lane options. The Laurelhurst Community Club rejects this. The options on the table do not reflect our rhetoric regarding what we aspire to be as a city. We urge the city council to reject the 6-Lane alternatives on the table and demand that the State plan and build a four-lane plus dedicated transit-way for the future SR520. Inherent in this approach must be a much stronger package of mitigation measures to minimize the project's impact to our environment and our communities.

This statement was unanimously approved at the September 11, 2006 meeting of the Laurelhurst Community Club Board of Trustees. For further information, please contact:

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