

Laurelhurst Community Club

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July 13, 2011

To: Daniel Mathis, Washington Division Administrator Federal Highway Administration
Megan White, Director, Environmental Services Office, Washington Department of Transportation
Jenifer Young, SR520 Bridge Replacement and HOV Project Environmental Manager

Dear Mr. Mathis, Ms. White and Ms. Young:

The Laurelhurst Community Club (LCC) submitted a lengthy analysis of the SDEIS for the SR520 Bridge Replacement in April, 2011.

The final EIS for such project was published with over 1100 pages on June 20th, 2011. While LCC has not scrutinized the entire report, we have selected findings that undermine the integrity of the final EIS and outline them below:

1. Introduction to the Project

a. Section 1 on Project Overview on Native American Tribes (page 6 of the Executive Summary, and 1-25 and 1-26 of the full EIS) reveals that the Preferred Alternative is not actually approved by the Muckleshoot Indian Tribe. The EIS is not tenable without their approval. The more than doubling of the original footprint may be completely unacceptable to their ancestral rights and covenants.

If this is the case, the western structure from the floating bridge to I-5 may have to be re-designed which would trigger another SDEIS to analyze such new impacts.

b. Section 1, page 3 (Executive Summary) notes the safety purpose of the project:

"The ever -present possibility of an earthquake in the Seattle area poses additional risk sin the SR520 corridor. The columns of the Portage Bay Bridge and both west and east approaches to the Evergreen Point Bridge are hollow and do not meet seismic standards."

However, on page 7, "When would the project be built?" T he EIS again states:

"The most vulnerable structures (the Evergreen Point Bridge and east approach)would be built in the first stage of construction."

Page 8 further states "However, the funding for the full corridor program falls approximately \$203 billion short of the \$4.65 billion total".

Last paragraph states," Should full funding not be available, the project would be phased, with the floating bridge and the landings comprising the initial construction phase.

Since the project was first proposed, the economic conditions, shortfall of funds will impact the ability of WSDOT to secure financing for re-building the most vulnerable parts of the corridor. The concerns by LCC for "phasing" of the project is discussed in the "alternatives" section #2.

2. Alternatives

Phased bridge building, Section 2.8, pages 2-74 and 2-75

"Due to the funding shortfalls, the FHWA and WSDOT still believe it is prudent to evaluate the possibility of phased construction should full project funding not be available by 2012.

Accordingly, this final EIS discusses the potential for the floating bridge and landings to be built as the first phase of the SR520 , I-5 to Medina project. This differs from the SDEIS Phased Implementation scenario which included the west approach and the Portage Bay bridge in the first construction phase."

Exhibit 2-29 illustrates the plan for the "partial bridge" construction. It shows that the HOV lanes and shoulders built to the north section will end before the western high rise, and, page 2-76 states,

" To connect the western end of the floating span to the existing western approach, WSDOT would construct a new interim connection, four lanes wide and 1500 feet long, between the new west transition span and the existing west approach bridge "(exhibit 2-28)

"To address the potential for phased construction, the final EIS evaluates construction of the floating bridge and landings separately as a subset of a "full build analysis".

The Laurelhurst Community Club opposes any "partial bridge " that leaves a super structure of 116 feet width suspended mid air for an unpredictable term (best case is 2018 assuming collection of gas taxes, tolling of I-90 and non-existent federal dollars) while full funding becomes available to complete the Medina-I-5 project.

This "phasing" is likely to become a semi-permanent design for the SR520 re-build, which **was not considered** as "an alternative" in the State Mediation process, nor fully vetted for its impacts in the SDEIS, 2.4. Only general schemes were identified, but their environmental impacts were not analyzed in the SDEIS.

Specifically, LCC has these concerns about a "phased" construction plan:

a. Environmental damage caused to the habitat of Lake Washington and Union Bay with excess footprint structures (twice), noise, pollution and emissions from construction.

b. Traffic bottlenecks created on Lake Washington caused by the merge of 6 lanes from the Eastside to the narrower 4 lane existing structure, causing air/water pollution for fish, wildlife and adjacent neighbors. The two key benefits of widening the existing bridge profile, specifically, giving transit/HOV priority, and the ability to cross in a non-motorized mode, will be lost for the foreseeable future with this "phased", partial bridge, as these lanes will not be built.

c. Building the structure "twice" with interim exit ramps, construction bridges, pile driving, hauling excess waste and double the noise for local residents, especially in Laurelhurst and in Madison Park

d. Local traffic impacts from a "partial bridge" that will result from reduced capacity from the increased volume of vehicles, including HOV, plus general purpose merging into 33% fewer lanes. Back ups on Montlake Boulevard from 520 to University Village and NE 45th Street would deteriorate to over 35-45 minutes in the pm peak commute.

e. Funding for the fully built Preferred alternate is predicated on many unpredictable sources. Since the EIS and SDEIS were published, ballot measures limiting tolling funds from I-90 will be put to voters in November, in addition to the reduction in revenues from the long delay in tolling the existing SR520 itself.

These funding problems will no doubt exacerbate the limited construction funds for SR520 and result in partial bridge building, much farther out on the original timeline.

Thus, adjacent neighborhoods will endure the effects mentioned above for a longer duration than predicted in the EIS which does not include these deficient funding factors.

f. The other alternatives developed include an Alternative L which was only supported by one stakeholder, Mark Weed, a developer who represented the transportation committee for the Seattle Chamber of Commerce. Virtually, no other Seattle Mediation group voted to even include this option, and several, times requested that WSDOT drop it, and include other acceptable alternatives. This was vetoed in the process, and the L alternative continued in the process. It is **not** listed on pages 2-10 or 2-11 in the full EIS, only mentioned that it was ruled out in advance of the EIS on page 2-26.

g. One option, M, was offered as a more viable, economical, and less environmentally adverse alternative, but was never fully included. It was considered "too damaging and expensive" even though the cost for the tunnel under the Montlake Cut was \$49.5 million, not an extra \$1.5 billion that was given to the Legislative Workgroup the night before the vote on the alternatives. The tunnel M was most acceptable to adjacent Seattle neighborhoods to reduce the impacts from a higher and wider super sized concrete viaduct design.

Its omission leaves out a key alternative that offered greater mobility and lesser neighborhood impacts.

Plan M offered the only alternative to have local traffic flow without building a second bascule bridge, providing a separated egress to and from SR520 from local traffic.

h. Location of the centerline of the Preferred Alternative new bridge total structure. Chapter 2, page 2-38 describes the location of the Preferred Alternative as location 190 feet north of the existing bridge. Through the mediation process with WSDOT, the adjacent communities agreed on a settlement that the western structure centerline would be no greater than 100 feet moved northward. Clarification of this statement is requested by LCC of WSDOT to ensure that this alignment corresponds with their overall agreed upon scheme since it is not fully depicted in the shortened exhibits showing the old vs. new structure's overall footprint.

3. Traffic analysis and tolling

There is a fundamental assumption that is illogical in the traffic analysis with regard to tolling. Page 18 of the Executive Summary notes that the No Build Alternative used for traffic comparison would not be tolled, yet the comparison is to a 6 lanes that would be tolled. The comparison should logically compare a tolled 6 lane to a tolled 4 lane to measure any difference in travel times. This is a simple math issue, that is a fallacy in the SDEIS traffic assumptions and subsequent analysis, which is carried into the EIS.

Page 32 of the Executive Summary states:

The project would improve mobility on SR520 and would meet local traffic concurrency standards. WSDOT have identified several potential intersection improvements that may benefit local traffic operations and will work with SDOT to determine their effectiveness. (section 5.1 of the EIS). Most of the EIS analyses center exclusively around the Arboretum traffic, and not a fully scoped to include local street impacts in adjacent Seattle neighborhoods and intersections . In fact, Peter Hahn of SDOT has repeatedly requested a full analysis in regard to the local traffic impacts for the Preferred Alternative from Madison St to NE 75th St, and this has not been accomplished before the EIS was issued.

Thus, the EIS is insufficient, and the Preferred Alternative local traffic impact data must be included to identify its effectiveness as a design for a transportation corridor for westside users, and local streets and neighborhoods.

4. Visual Quality

The Executive Summary has a section on visual quality on page 42, and a section 5.5 , pages 5.5. 1- through 5.5-25, in the complete EIS. No viewpoints/photos from the Laurelhurst neighborhood (any views looking south onto the new structure) are included in the EIS. This omission is completely unacceptable, and we consider this a serious omission from the EIS. The new section bridge will be built entirely to the north, directly impacting the visual quality of homes in the Laurelhurst neighborhood. Photos were submitted by the legal graphic photographic (Legal Media, Inc) in our LCC comments of April, 2011. The exclusion of any such photos from their firm, and WSDOT identifying the visual impacts on affected Laurelhurst residents renders the EIS incomplete.

The visual impacts of the new Preferred Alternative are significant and will affect the value of the homes in the view corridors in a negative way, and mitigation should be required.

5. Air Quality

The Executive Summary (page 50) states that " all SDEIS alternatives reduced congestion and improved traffic speeds" resulting in a "slight improvement in air pollutant emissions compared to no build" See point #3 that simply tolling the "no build" might also reduce congestion and emissions, although this data is not included in the EIS.

With any lengthy "partial bridge" or segmented bridge, the results are actually an increase in congestion from merging 6 into 4 lanes. In addition any advantage gained from the HOV lanes and non-motorized crossing of bikers and pedestrians are lost in the "phased bridge". There will logically be **more** congestion sitting in a traffic bottleneck on top of Lake Washington as HOV's, and SOV lanes merge and the result is an **increase** in emissions, and **worsening** of air quality for the habitat of Lake Washington and the people who inhabit the adjacent neighborhoods of Laurelhurst and Madison Park. Thus, any partial bridge is not acceptable as it creates more pollutants for an indefinite period.

6. Water Resources

The Executive Summary (page 52) states that the Preferred Alternative will increase the amount of land covered by pollutant-generating impervious surfaces within these areas by 35-45% to complete this project. The construction effects will result in direct disturbance of water bodies, including turbidity and spill of pollutants. Dewatering will take place and severely impact the wetlands (page 53).

In addition, of the 3 alternatives (page 54, Ecosystems)," the Preferred Alternative would result in the most wetland shading in the western approach" "The Preferred Alternative and all of the SDEIS options would affect wildlife by permanently removing vegetation and wildlife habitat, and by increasing shading".

Further, on page 56, the Executive Summary notes, "Construction would also result in areas with reduced fish habitat functions, primarily due to increased shading by work bridges and barges.

" The Preferred Alternative and SDEIS options would require substantial in-water pile driving to build construction work bridges in shallow water areas that cannot be accessed by barge.

".....the underwater sound levels generated.. can disturb or alter the natural behavior of fish and aquatic species and cause mortality....

The mitigation is not clear in the EIS, and as such, is unacceptable. On page 56 in the Executive Summary, it states, "WSDOT will continue to work with the City of Seattle and the UWA to develop mitigation planting strategies to offset construction effects on shoreline habitat in Portage Bay and Union Bay."

This statement is woefully inadequate for the final EIS. WSDOT should have a specific analysis and plan to save the irreplaceable habit of the wetlands and its ecosystems in Portage and Union Bays **before** issuing this EIS.

In summary, the EIS issued in June 2011 for the SR520 re-build is inadequate in terms of its omissions of the impacts for the affected water and air quality environments, local traffic impacts, lack of analyses of any "partial bridge" phasing, the incomplete predictability of funding for the entire corridor, omission of Plan M tunnel alternative, the lack of final approval from the affected tribes, and the omission the visual impacts of the Preferred Alternative on the view sheds from northern residents where the new bridge will be built . It also is not clear where the northern footprint is compared to agreements with adjacent communities on the western approach.

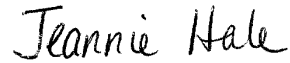
Building a new transportation corridor through these environmentally sensitive ecosystems and densely populated neighborhoods, requires a better design solution, and the EIS does not provide such an optimal solution.

The Laurelhurst Community Club requests that the Federal Highway Department and WSDOT complete the above analysis before issuing any Record of Decision for the final design of the replacement of the SR520 bridge corridor.

Sincerely,



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