







**Mike McGinn, Mayor**  
City of Seattle

July 15, 2011

Julie Meredith, PE  
SR 520 Program Director  
Washington State Department of Transportation  
600 Stewart Street, Suite 520  
Seattle, WA 98101

Dear Ms. Meredith,

Thank you for the opportunity to comment on the Final Environmental Impact Statement (FEIS) for the SR 520, I-5 to Medina Bridge Replacement and HOV Project.

I appreciate the hard work done by your staff and the resulting changes that have been made over the course of the last year to accommodate light rail on SR 520 in the future. While there is much work to do before light rail can be implemented, our region will be well served by these changes. Nevertheless, it remains clear to me that the preferred alternative has far more impact than other tenable alternatives.

#### **Range of Alternatives and Tolling Analysis**

The FEIS states, "The 4-Lane Alternative evaluated in the Draft EIS was not evaluated further because it was determined not to meet the project purpose of improving mobility on SR 520."<sup>1</sup> The SDOT memo to this office regarding the SR 520 FEIS (see attached) disagrees with your conclusion that the four-lane alternative does not meet the project purpose. I agree with SDOT's assessment.

The FEIS includes analysis for a tolled four-lane alternative in Attachment 19 ("Transit Optimizing Sensitivity Analysis"), which outlines vehicle to capacity ratios (V/C) for the SR 520 corridor under different tolling scenarios. The current V/C ratio for SR 520 is 1.2 and your analysis states a goal of free-flow conditions (represented by a .85 V/C ratio). At a \$4.00 toll rate, the V/C ratios for the four-lane tolled alternative are dramatically improved, to 1.06 and .89 in the eastbound and westbound directions, respectively. This \$4.00 rate is not much greater than the \$3.50 peak rate tolls that are scheduled to begin this year. To say that a tolled four-lane alternative does not meet the project purpose of improving mobility on SR 520 runs counter to your analysis.

Because of the smaller footprint of a four-lane alternative, fewer takings of parkland and habitat, the reduced affect on recreation, the increased visual quality, and the fact that the vehicle to capacity ratio can still be dramatically improved with tolling, I disagree with your choice to exclude the four-lane tolled alternative as an official alternative in the FEIS. A four-lane alternative combined with real investments in high capacity transit has the potential to substantially improve the movement of people and goods while reducing the environmental impact associated with your preferred alternative.

#### **Release of Substantial New Information**

WSDOT has included a substantial amount of new information in the FEIS, including new traffic analysis for the preferred alternative and the different phases of construction. Ideally, WSDOT would have made

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<sup>1</sup> SR 520, I-5 To Medina: Bridge Replacement and HOV Project Final EIS and Final Section 4(f) and 6(f) Evaluations, Section 2, page 21

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this significant information available to the public prior to its inclusion in the FEIS or would have allowed adequate review time in the form of a final comment period after the release of the FEIS.

### **Mitigation of Local Traffic Impacts**

I remain concerned about the lack of commitment to fund mitigation for local traffic changes that result from the preferred alternative, a concern that was expressed by SDOT director Peter Hahn in his April 27, 2011, letter to you. Without specific mitigation commitments, there is no guaranteed plan or funding for implementation of projects to reduce the project's impact on neighborhoods and streets in Seattle. The FEIS does not discuss or commit to future funding for traffic calming, traffic management, or intelligent transportation systems—with the exception of minor traffic calming in the Arboretum—despite the fact that the FEIS acknowledges that travel patterns on local streets will change. The lack of specific mitigation for these changes leaves me unable to determine if the state plans to address these impacts.

### **Commitment to High Capacity Transit**

SDOT's memo recommends the use of transportation demand management strategies during construction, including funding additional transit service to mitigate construction impacts. I support this recommendation and feel that WSDOT has not made a sufficient commitment to increase transit service—especially high capacity transit—both during and after construction. The SR 520 High Capacity Transit Plan calls for bus rapid transit (BRT) on the corridor. Implementation timelines and funding for BRT is unspecified at best and is in jeopardy of being delayed for many years due to regional transit funding crises. While I understand that light rail across I-90 will play an important role in improving east-west transit in the region, BRT is still needed to move more people in fewer vehicles throughout the SR 520 corridor. Further work is also needed to ensure the project is adequate for light rail at the western landing.

### **Impacts of Project Phasing**

The impacts of phased implementation of the SR 520 project are not adequately addressed in the FEIS. As you know, the \$2 billion funding gap is not closed, the Seattle portion of the project will remain unfunded and unconstructed for a significant period of time. Throughout this "interim" condition, the new six-lane bridge will transition to the existing four-lane structure at the Western high-rise, which may have impacts on Seattle-area travel and air quality. The FEIS qualitatively describes these impacts, but they have not been quantitatively evaluated to determine their true significance. This lack of analysis could have negative consequences for the city of Seattle.

Thank you for considering these comments. I look forward to WSDOT's continued collaboration with the City of Seattle.

Sincerely,



Mike McGinn  
Mayor of Seattle

Attachments: Seattle Department of Transportation Comments on SR 520 Final Environmental Impact Statement;  
Seattle Parks and Recreation Comments: SR 520 Final Environmental Impact Statement;  
Seattle Department of Planning and Development Comments on SR 520 Final Environmental Impact Statement;  
Seattle City Light Comments: SR 520 Final Environmental Impact Statement;  
Seattle Public Utilities SR 520 Interests and Concerns