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To: SR 520 Bridge SDEIS
Subject: Comment on the 520 SDEIS

I-002-001

The 520 SDEIS is deeply flawed on a critical point. As a consequence, it does not consider some options that will both save money and improve future mobility.

The flaw is that future traffic is highly unlikely to match extrapolations from past trends. The reasons are the two unmentioned elephants in the living room: (1) Peak Oil and (2) Climate Change.

Because of Peak Oil, SOV-type daily commutes will rapidly become unaffordable for much of the middle class over medium to longer distances. This will be one aspect of a long term economic contraction that will likely continue, with ups and downs, until alternatives to fossil fuels become more affordable on a mass scale. Thus a more realistic scenario for 2030 would project decreased traffic, not increased.

Mandates to address Climate Change will just reinforce this economic trend. In other words, extrapolations cannot take into account paradigm shifts. What are needed are different scenarios that do take these into account, thereby also better capturing the true level of uncertainty that civilization is facing.

I-002-002

One consequence is that the two HOV lanes should be designed as exclusive transit lanes from the beginning, including building in rails for future light rail, or at least designing to make this very easy to do in the future. With congestion-price type tolling, there will be strong incentives for carpools even without carpool lanes. Meanwhile barrier-separated transit lanes won't slow to a crawl during rush hour, as do current HOV lanes, providing far more reliable service, hence getting many more people out of their cars. In fact, by 2030, after skyrocketing oil prices and economic contraction, we might find that a 4 lane configuration would work just fine, so this should be studied as well.

I-002-003

We should also just say no to the Arboretum on and off ramps in the A+ option and go for the simpler A option. These ramps will do nothing to encourage transit or carpooling, quite the opposite, while preventing restoration of the Arboretum.

I-002-004

However, we should say yes to the transit flyer stops omitted by all the options.

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I-002-001

The transportation analysis conducted for the Draft EIS, SDEIS, and Final EIS took into account future changes in travel demand. Growth in regional travel demand is based on growth in population and employment projected by local jurisdictions and the Puget Sound Regional Council (PSRC) through the metropolitan planning process. Other factors considered in demand modeling include economic factors such as direct costs (parking costs, fuel costs, and tolls), available alternatives such as transit and its cost to riders, federal fuel efficiency standards (accounting for an average fleet fuel efficiency based on the forecast year), and other regional economic factors forecasted by PSRC, in predicting future travel demand. PSRC has conducted studies to evaluate the influence of changing fuel prices, vehicle technology, and greenhouse gas policies on future travel demand, and periodically updates its travel demand models with current assumptions; the project travel demand models are based on PSRC's current models. Chapter 3 of the Transportation Discipline Report (Attachment 7 to the SDEIS) and the Final Transportation Discipline Report (Attachment 7 to the Final EIS) provides information on travel demand modeling.

It is true that the project travel demand model for 2030 does not show a paradigm shift; the model predicts that many vehicle trips will still occur. The model also predicts growth in cross-lake travel demand due to expected population and employment growth. However, the model does show a greater proportion of trips using transit with the project, compared to No Build conditions.

The SR 520 project would complete the HOV lane system in the corridor and add a bicycle/pedestrian lane to the corridor. The project would not add general-purpose lanes. The project would result in immediate benefits for transit speed and reliability in the corridor by providing high-occupancy vehicle (HOV) lanes across the floating bridge and better HOV connections at the Montlake and I-5 interchanges (see Section 5.1

of both the SDEIS and Final EIS). Because the project would improve reliability and efficiency for transit and carpools, it would create incentives for people to choose an alternative to driving alone. Section 5.9 of the Final EIS includes a discussion of how the project relates to regional goals to reduce greenhouse gas emissions.

I-002-002

The decision to site Sound Transit's initial east-west light rail transit (LRT) corridor on I-90 rather than SR 520 has been made through extensive regional deliberation. Table 2-2 in the Final EIS illustrates the history of regional decision-making on east-west mass transit routes, which began in 1967 when the Comprehensive Public Transportation Plan for the Seattle Metropolitan Area identified a rail corridor from Seattle to Bellevue and Redmond across I-90. Subsequent studies and agreements over the next 40 years have all continued to identify I-90 as the preferred rail transit corridor, with similar or higher predicted ridership than SR 520 and substantially lower costs and environmental impacts. However, the Preferred Alternative allows for two future rail options.

As described in Section 1.8 of the SDEIS and in Attachment 8 of the SDEIS, Range of Alternatives and Options Evaluated, the transportation analysis performed for the Draft EIS showed that while a 4-lane alternative would improve safety by replacing vulnerable structures and widening lanes and shoulders, it would not satisfy the project purpose of improving mobility in the SR 520 corridor. In 2010, based on SDEIS comments regarding a transit-optimized 4-lane alternative or a 4-lane alternative with tolling for congestion management, WSDOT evaluated these potential alternatives using an updated traffic model. The results showed that these alternatives would provide substantially lower mobility benefits than the 6-Lane Alternative for both general-purpose traffic and transit, and therefore would also not meet the project purpose and need. Section 2.4 of the Final EIS provides more information on the analysis of these alternatives.

I-002-003

Since the SDEIS was published, WSDOT and FHWA have developed a Preferred Alternative, which includes modifications to the Montlake Boulevard interchange and lid that would better accommodate transit. With implementation of the Preferred Alternative, bus stops on the lid would accommodate both eastbound and westbound buses, replacing the current Montlake Freeway Transit Station stops for buses traveling between the University District and the Eastside. The Montlake lid stop would also function as a flyer stop during the off-peak periods so that passengers could access the SR 520 buses traveling between the eastside and downtown Seattle. University Link light-rail service, expected to be operational in 2016, will accommodate some of the trips that now use the bus stops. Please refer to the Final EIS for more information on the Preferred Alternative and Chapter 8 of the Final Transportation Discipline Report for an updated assessment, including quantitative data, of how removal of the Montlake Freeway Transit Station would affect transit service, rider travel times, and connections. The Preferred Alternative would not include construction of any new ramps in the Arboretum, and would remove both the existing Lake Washington Boulevard ramps and the R.H. Thomson Expressway ramps.

I-002-004

The Montlake Freeway Transit Station stops were removed in all of the design options considered in the SDEIS, based on a decision making process that was part of Westside mediation. The mediation process was mandated by Engrossed Substitute Senate Bill 6099 and is described on pages 1-17 through 1-19 of the SDEIS. The mediation workgroup consisted of members from adjacent neighborhoods, transit agencies, jurisdictions, and State agencies. Removing the Montlake Freeway Transit Station would minimize the width of the freeway through the Montlake area, reducing the width by up to 40 feet compared to keeping the station. The mediation workgroup did not recommend any

design options that included the Montlake Freeway Transit Station stops. See Attachment 8 to the SDEIS, Range of Alternatives and Options Evaluated, for further discussion of how and why removal of the stops was considered.

The Preferred Alternative includes removal of the Montlake Freeway Transit Station stops; however, it also includes a modified Montlake Boulevard interchange and lid. Modifications include a full lid from Montlake Boulevard to the Lake Washington shoreline, and bus stops on the lid for both eastbound and westbound buses (see Chapter 2 of the Final EIS for a description of the Preferred Alternative). The intent is to provide greater pedestrian amenity in the central part of the Montlake neighborhood while simultaneously providing a better location and environment for the regional bus stops incorporated in the transit/HOV direct access ramps (see Chapter 2 of the Final EIS). At the option of the transit agencies, SR 520 buses will be able to exit at the Montlake interchange during the off-peak periods to service passengers to/from the Montlake lid transit stop. University Link light-rail service, expected to be operational in 2016, will accommodate some of the trips that now use the bus stops. Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) provides further discussion of expected transit operations with the Preferred Alternative, including expected transit travel times, rider connections, and how future transit would incorporate service currently provided at the stops.