

University District Community Council
4534 University Way N.E.
Seattle, WA 98105

February 2, 2010

Paula Hammond
Secretary of Transportation
Washington State Department of Transportation
c/o Jenifer Young
SR 520 Project Office
600 Stewart St., Suite 520
Seattle, WA 98101

RE: Supplemental Draft Environmental Statement
SR 520 Bridge Replacement and HOV Project

Dear Secretary Hammond and Environmental Manager Young:

C-001-001

The University District Community Council favors Alternative A+ without the Arboretum ramps. Alternative A is a significant improvement over the version of Alternative A in the 2006 draft environmental impact statement. Alternative A would accomplish the statutory purposes of the project with the least damage to the Arboretum, the Union Bay wetlands, the environment, the UW Campus and the surrounding communities. Options K and L are not acceptable. Not only do they do irreparable damage to the environment, neither design serves transit, motorists or freight mobility as well as Alternative A; and each design causes substantially more congestion on local streets in North East Seattle than Alternative A.

C-001-002

A scan from the source documents to the Executive summary shows a progressive softening of the faults of Option K:

Example 1: The Transportation Discipline Report ("TDR") page 6-40, reports that traffic at the intersection of NE Pacific Street and Montlake Boulevard would exceed its capacity by 38% during the evening rush hour, 2030, affecting intersection to the north, south, and west; it would rate an LOS F. Exhibit 6-3 of the shows that Alternative A has a better traffic flow on 8 of 11 intersections in North East Seattle and is equal on the other three.

The SDEIS, page 5-18, states that Option K would degrade operations "at only one intersection (Montlake Boulevard/NE Pacific Street) during the afternoon peak hour ... because there would be more vehicles traveling northbound through the intersection. An inset to the diagram on Exhibit 5.1-10, at page 5-15, shows the intersection with a red dot, LOS F.

The Executive Summary, page 29 clips this down to "Under Options K and L, traffic volumes north and south of the Montlake Cut would increase when compared to the No Build Alternative and Option A."

Example 2: The TDR pages 6-39 and 12-9 and 10 states that Option K's eastbound off ramp to its turnaround leading to its SPUI during the 2030 P.M. peak would operate over capacity during peak hours and congestion would back up on to SR 520 mainline. It also notes that about 1000 vehicles per hour would change lanes within 500 feet.

The SDEIS and the Executive Summary make no mention of either effect. The softening resembles sunlight playing on a mesa in the desert. The discipline reports lay bare the truths about Option K in the sunlight of mid-afternoon; the SDEIS eases up like a later afternoon sun; and the executive summary washes out the faults like the twilight rays of a setting sun. Both documents should be reviewed toward a more critical and accurate disclosure of the consequences of Options K and L.

C-001-001

WSDOT received a number of comments in support of and in opposition to Options A, K, and L and the associated suboptions. These comments are summarized in the Supplemental Draft Environmental Impact Statement Summary of Comments that was published in April 2010 and is available at <http://www.wsdot.wa.gov/projects/SR520Bridge/SDEIS.htm>.

Since the SDEIS was published, FHWA and WSDOT have developed a Preferred Alternative that is similar to Option A but includes design refinements that respond to community and stakeholder comment on the SDEIS. The Preferred Alternative substantively addresses the University District Community Council's recommendations. It would eliminate the existing Lake Washington Boulevard eastbound on-ramp and westbound off-ramp, as well as the R.H. Thomson Expressway ramps. Westbound SR 520 traffic would be able to access Lake Washington Boulevard via a new intersection located on the Montlake Boulevard lid at 24th Avenue East.

Please see Chapter 2 of the Final EIS for a description of the Preferred Alternative and Chapters 5 and 6 for analyses of its environmental effects.

C-001-002

The SDEIS presented the effects from all of the analyzed options in accordance with NEPA standards. The effects listed in the comment were discussed in either the main text of the SDEIS or in the discipline reports attached to the SDEIS and incorporated by reference; the effects are not required to be presented at the same level of detail in both documents. The Executive Summary briefly summarized the analysis and findings and was not intended to include the level of detail contained in the rest of the document.

C-001-003

Trucks hauling materials should use SR 520 to I-5 or to the eastside wherever possible. Use of North East Pacific Street, 15th Avenue N.E., and N.E. 45th St. should be avoided to the maximum extent. These streets pass University Hospital and along already streets already heavily congested with bus and business traffic. University District streets will be used for construction of Sound Transit stations and other projects in our vicinity and that imposes a substantial sacrifice upon our residents and businesses for accommodating public works and area development.

C-001-004

Wherever appropriate, the many recommendations and representations contained in the discipline reports and in the SDEIS for avoiding, and mitigating adverse consequences in the design, construction, and operation of the project should be included in the record of decision and made a part of an intergovernmental agreement for the project along with a recommendation for a corridor management agreement.

Yours truly

Matt Fox
President

Additionally, WSDOT received a range of comments about the portrayal of Option K in the SDEIS. Some commenters indicated that Option K's negative effects were understated, and others felt they were overstated. Ultimately, Options K and L were not identified as the Preferred Alternative, due in large part to the negative environmental effects associated with them. If Options K or L were identified as the Preferred Alternative in the future, additional detail would be provided at that time.

C-001-003

Construction assumptions developed for the project identify major freeways such as I-5, SR 520, and I-405 as primary haul routes intended to carry most project truck traffic. However, there will be times when city streets will need to be used as secondary haul routes. Secondary haul routes for the SR 520, I-5 to Medina project were identified based on criteria such as shortest off-highway mileage, and providing access to locations needed for construction where direct highway access is unavailable.

Since publication of the SDEIS, WSDOT has refined potential haul routes to avoid using non-arterial neighborhood streets. Local jurisdictions can limit the use of non-arterial streets for truck traffic; therefore, efforts were made to identify designated arterial streets for potential use as haul routes. Local jurisdictions will determine final haul routes for those actions and activities that require a street use or other jurisdictional permit. The permit process typically takes place during the final design phase and prior to construction.

Chapter 3 of the Final EIS provides updated information on potential haul routes. Northeast Pacific Street and 15th Avenue Northeast are identified as potential haul routes for Options K and L only. There are not identified as potential haul routes for Option A or the Preferred Alternative. A map showing potential haul routes, with locations, descriptions, construction duration, and estimated truckloads per day, is included in Chapter 6 of

the Final EIS and in the Final Transportation Discipline Report (Attachment 7 to the Final EIS).

C-001-004

The Final EIS contains mitigation measures for potential operational and construction effects that could result from the Preferred Alternative. These measures are based on the level of project design development required by NEPA and are consistent with applicable federal, state, and local laws and regulations. As design development progresses, WSDOT will continue to define mitigation measures for the project in accordance with Engrossed Substitute Senate Bill (ESSB) 6392 and through coordination with applicable federal, state, and local agencies during the permitting and approval process.

After the Final EIS has been issued, FHWA, the federal lead agency for the project, will prepare a Record of Decision (ROD), which will document the course of action it has decided to take. The ROD will explain how the lead agencies plan to implement mitigation measures and conservation action to comply with NEPA and other laws, including recommendations of the ESSB 6392 workgroups where appropriate for the level of design development.

Although the ROD is the conclusion of the NEPA process, it signals the beginning of project implementation, when WSDOT will begin to develop the detailed engineering design for the project, including additional details about project phasing, construction staging, and construction techniques. At that point, WSDOT will also develop more specific designs for mitigation measures, which will be documented in project permit approvals. WSDOT will comply with local jurisdiction regulations for construction and will continue to work with the local communities to define construction mitigation measures through the permit and approval process.