

From: Earl Bell [mailto:earljbell@hotmail.com]
Sent: Tuesday, April 13, 2010 7:30 PM
To: SR 520 Bridge SDEIS
Cc: Ruedi Risler
Subject: UPCC Comments on the SR 520 SDEIS

UPCC Comments on the SR 520 SDEIS
Addendum to DEIS Comments

C-018-001

The Comments submitted by the University Park Community Club (UPCC) pursuant to the call for public comment on this project contained in the DEIS published 7/18/2006 are hereby referenced (October 4, 2006).

The UPCC participated as a recognized party in the prolonged 520 Mediation Panel begun in the Fall of 2007 and finally abandoned in 2009. As an active organization in this issue we wish to elaborate on our remarks that were prepared and submitted nearly four years ago. While some of the issues then are still being debated today, the 13th of April 2010, one issue that was neglected in our original DEIS comments has emerged and requires our position be extended. These comments in no way modify our original position in support of a six-lane bridge with two lanes dedicated to public transit.

Our major environmental concern then was the ecological integrity of Union Bay, and by extension, the Montlake Cut and adjacent Portage Bay. These remain today but to them must now be added a concern about the connection of the new bridge's access and egress with Lake Washington Blvd. S. ("Boulevard") which passes through the Arboretum and carries today an even heavier load of passenger vehicles than in 2006.

The UPCC neighborhood, while not directly impacted by ramps connecting to the Boulevard, nonetheless is deeply concerned about the health of the Arboretum and its vital role as a city park and open space. It is an irreplaceable treasure; our members and residents have a strong interest in its protection.

Accordingly, we oppose connecting the Boulevard to access ramps for the new 520 Bridge and join other communities who share our wish to see the removal of such ramps from a final option to be selected by the WS Department of Transportation. We support moving to a Final EIS and getting the project implemented.

Submitted on behalf of the UPCC Board,

Earl J. Bell

c: Seattle City Council

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C-018-001

Since the SDEIS was published, FHWA and WSDOT have developed a Preferred Alternative that is similar to Option A but incorporates design refinements that that respond to community and stakeholder comments on the SDEIS. The Preferred Alternative would improve mobility and safety while reducing negative effects.

The Preferred Alternative 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 access Lake Washington Boulevard via a new intersection located on the Montlake Boulevard lid at 24th Avenue East.

The design refinements in the Preferred Alternative would alleviate traffic effects on Lake Washington Boulevard in the Arboretum, improve visitor access to the Arboretum, and benefit the Arboretum's environment by removing the existing ramps, which would reduce traffic volumes on Lake Washington Boulevard through the Arboretum compared to the No Build Alternative, and providing design features and mitigation measures responsive to recommendations of the Arboretum and Botanical Garden Committee (ABGC). In addition, WSDOT is actively coordinating with the ABGC and City of Seattle to create a traffic management plan for the Arboretum, emphasizing the portion of Lake Washington Boulevard passing through the Arboretum and including traffic calming measures and traffic management options. Please see Chapter 2 of the Final EIS for a description of the Preferred Alternative and Chapters 5 and 6 for discussions of its environmental effects.

UNIVERSITY PARK COMMUNITY CLUB

OCTOBER 4, 2006

Paul Krueger
Environmental Manager
SR 520 Bridge Replacement Project

Comments sent to sr520deiscomments@wsdot.wa.gov

These are Comments submitted by the University Park Community Club (UPCC) pursuant to the call for public comment on this project contained in the DEIS dated August 18, 2006. We join those individuals and organizations who have stated their concerns or their opposition to the Pacific Street Interchange Option (PSIO). As the manner in which all of the alternatives and options are presented serves to make it appear that this option under the six-lane alternative is the WSDOT "putative preferred alternative" (PPA) most of our comments will be addressed to it specifically.

First, we lay out our objections to the PPA and then we follow with what we believe is an alternative that will accomplish much of what is sought from this investment without the necessity of a total transformation of the neighborhoods north of the Ship Canal.

Put most succinctly, the UPCC does not see anything in the DEIS that is persuasive that the PPA would be anything but harmful to the environment north of the Ship Canal. It *might*, however, succeed in doing something for the Montlake neighborhood in terms of re-routing traffic that would pass through towards another adjacent area, but at what cost in terms of peace and tranquility for these other areas is nowhere examined in the DEIS.

To us, the Pacific Street Interchange, while it appears to offer some possibility of improving throughput of vehicles through this busiest of intersections, does so only by an "improvement" that is completely out of scale. The impact on one of our major recreational areas (e.g., the UW waterfront) would be devastating, not only in terms of diminished opportunity for recreation but also in terms of environmental impact. However, even if there were magically no impacts in the area surrounding the Interchange, the consequences at short distances from it are not spelled out or even cursorily mentioned in the DEIS. For example, there is no mention of projected congestion estimates for any intersection north of NE 45th or west of 15th AV NE. Those projections that are shown are in the vicinity of Montlake Blvd north of Pacific Street. Communities like ours are left wondering what it might look like in 2030 if the alternatives were built. The DEIS is not helpful to this process. No information is given regarding projections for general increase in traffic volumes in surrounding areas such as Ravenna, Wallingford, Bryant or Laurelhurst.

Members of our community know that any project of this scale will have unintended consequences that will likely be anywhere from significant to devastating. What troubles us is the lack of any attention in the DEIS to the consequences that *are* intended. The PSIO has been put forth as a sort of panacea for solving a problem that may not be amenable to solution: the movement of people and goods using automotive vehicles other than rapid transit without severe impacts on the areas through which the vehicles pass. This is a long term project. While no light rail is foreseen across the 520 bridge in the next expansion of the light rail system, it is

C-018-002

Please see the Draft EIS Comment Summary Report for responses to comments received on the 2006 Draft EIS (Attachment 13 to the Final EIS).

certainly reasonable to expect such an expansion during the 50+ year lifetime of the new bridge. The DEIS contains mentions in passing that the bridge pontoons would be designed to be able to carry rail rapid transit, but there is no design for how this would be achieved.

If we really want to reduce the Montlake mess we have to turn to public transport and move the

bulk of the projected demand to this transport modality. This has not seriously been considered in the DEIS. There is not even a clear plan of how passengers transfer between different bus lines.

There must be a valid concept of how a new light rail line would continue on either side of the bridge and connect to other lines and buses. For instance, the intersection near Marsh Island should be designed to accommodate the wider curves needed for light rail to make the turn towards Husky Stadium. Once light rail gets to the Pacific Street intersection is it going to go over all the planned new construction or below? Can the mezzanine floor of the presently planned station be modified for an underground east-west station for a line to Ballard, or is the 520 line going to make a turn and connect to the downtown line? We should not box ourselves in and prevent solutions needed in the future.

This Putative Preferred Alternative is the most expensive alternative, mostly because it involves the ambitious Union Bay Bridge but it will also be due to numerous lids and other benefits for the Montlake neighborhood. It is instructive to note the comments from the report of the Governor's Expert Review Panel dated September 1, 2006:

"The SR 520 project premised its finance plan on \$573 million of secured funding and over \$3.6 billion of anticipated funding. We think that premise is overly optimistic. Overall, we find it unreasonable to assume the project will realize sufficient funding from secured and anticipated funding sources. We doubt that an anticipated \$153 million in sales tax revenue will be transferred to the project. We have assumed that only the six-lane alternative, if selected, will receive Regional Transportation Improvement District (RTID) ballot measure funding of \$800 million. Moreover, we find no basis to believe that any of the second increment of the RTID funding target of \$1.4 billion will be available to the project.

Consequently, we find that the funding sources identified in the SR 520 finance plan fall far short in secured and anticipated funding categories. This shortfall is of particular concern, given the impacts to regional circulation if the structure should fail. The lack of alternative routes makes it essential to fully fund the solution chosen for SR 520 bridge alternative."

Thus, with the recent adjustments due to inflationary pressure and the Seattle City Council's apparent preference for the most expensive option, the process is dangerously close to assurance that the PPA will not be fully funded. This being the case, the UPCC urges the adoption of the 6-lane alternative with a second Montlake bridge as the most prudent way to proceed given the current fiscal situation of the State. The six-lane alternative is acceptable as an alternative only if the "HOV lanes" are dedicated not for HOV use but for transit use exclusively. To do otherwise would be to court a lack of full funding and thus to delay the immediate undertaking of bridge replacement.

The UPCC recognizes that the six-lane alternative is the likely selection by WSDOT and other decision-making bodies involved in the final selection. With the two

additional lanes dedicated to transit, we could support the six lane alternative. Nonetheless, the UPCC wishes to emphasize its opposition to the Pacific Street Interchange Option no matter what level of funding turns out to be available. Our opposition, as outlined above, is not based entirely upon cost, but lack of benefits for our and other communities north of the Ship Canal as well as the lack of a viable public transit solution.

Please direct any questions or requests for clarification to the email address shown on page one.

I have been authorized and directed to submit these comments on behalf of the Executive Board of the University Park Community Club.

Earl J. Bell
Board Member