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Comment noted. See the responses below.

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Sent: Thursday, April 15, 2010 7:54 AM
To: SR 520 Bridge SDEIS
Cc: Hammond, Paula; Dye, Dave
Subject: Comment on SDEIS for "SR 520, I-5 to Medina: Bridge Replacement and HOV Project"

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This project recalls *The Economist's* notice to the entire English-speaking world that the greater Seattle area "probably has the worst transport planning in North America" on June 30, 2005.

That prominent international journal's studied judgment of boundless good intentions was validated, promptly, when the Seattle monorail project collapsed from serial bad judgments that completely wasted \$125 million in tax dollars needlessly imposed on city residents.

Five years later, any remaining doubt still possible about the worst transportation planning brought forth on this continent has been removed by a multibillion-dollar highway project to add "high capacity transportation" east and west through the pivotal State Route 520 corridor, and by another multibillion-dollar, **intersecting-but-unconnected**, rail-transit project to upgrade "high capacity transportation" north and south through a light-rail spine largely within Seattle's boundaries.

This reality gives the lie to falsely claimed concerns about an SR 520 corridor which is "**Congested, unreliable, and does not encourage maximum transit and carpool use**" (bolding in Executive Summary at page 6), since nominal multibillion-dollar solutions are designed to discourage **both** maximum-possible transit use and **also** maximum-feasible relief from "severe traffic congestion."

What makes this lack of functional connectivity especially bizarre is indisputable emphases by our state Legislature on the quintessential importance both of **interconnected** High Occupancy Vehicle facilities, bus-rapid-transit and vanpools using those HOV highway lanes, and rail-transit projects (which all initially derive from one path-breaking bill adopted as our state's omnibus "High Capacity Transportation Systems" act in 1990), and also of **compulsory** planning for regional transportation involving such HCT systems being not only "multimodal" but also "cost effective" (which two additional legal requirements subsequently obtain from a likewise visionary and absolutely explicit statute mandating that regional planning here **must** be "based on a least cost planning

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methodology that identifies the most cost-effective facilities, services, and programs” as adopted in 1994).

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Equally maddening after over 15 years of **nominal** transportation planning to devise the irrationality of one multibillion-dollar project literally intersecting with another such multibillion-dollar project at the University of Washington without any **genuine** attention to designing optimal connectivity, from buses to trains, is a planning bureaucracy responsible for this utter fiasco at the state Department of Transportation, Sound Transit and Puget Sound Regional Council that continues to yap endlessly on, without surcease of sorrow, about a **purported** “multimodal” transportation commitment here.

Making matters even worse, not only is Sound Transit the official “lead agency” for its light-rail program, but it also took steps to be specially designated as a “co-lead agency” for adding two HOV lanes to the Evergreen Point Floating Bridge for its express buses – and, while acting as “lead” and “co-lead,” doing nothing or next to nothing to connect its light-rail trains with its express buses, at the UW campus, despite obtaining \$1.313 billion from the U.S. Treasury based on major transit- volume potentials there. Further, that regional transit agency utilized its insider “colead” position to exploit fuel-tax funds for the design of bridge pontoons, in order to benefit its future rail plans, **as a patently unlawful non-“highway use” in violation of our state Constitution’s 18th Amendment.**

With newly elected Seattle Mayor Mike McGinn urging that huge gaping holes in **real** “multimodal” planning require reconsideration – since 20 years of convenient political rhetoric cannot transform two decades of disregard for our state “High Capacity Transportation Systems” act and 16 years of defiance for its explicit “least cost planning” requirements into anything but insubordination toward and insolence for state law – belligerent objections to this sanity insist, effectively, that the “worst transport planning in North America” has succeeded in running out the clock for **actual** planning by flouting state statutes, and that a multibillion-dollar charade obvious even to a neophyte politician must prevail because adequate funds are lacking to build **true** “multimodal” transportation here.

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All fallacies deriving from missing elements at beginning, middle and end of said illogical objections notwithstanding, reality is that both a projected \$2.6 billion shortfall for SR 520 bridge replacement, today, and also another \$101.2 billion deficit in regional funding for follow-on transportation plans, during the next 30 years, each has substantially resulted from willful failures to comply with our state’s admirably farsighted legislation adopted in 1990 to create **interconnected** “High Capacity Transportation Systems” and expanded four years later to require **“least cost planning”** statewide.

In short, immense problems with **nominal** planning for the SR 520 corridor devolve from violations of the Washington State Constitution, our state’s pivotal HCT law and core regional transportation planning requirements expressly

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Please see Chapter 8 of the Final Transportation Discipline Report for descriptions and exhibits of transit service and rider connections in the Montlake interchange area with the Preferred Alternative. This discussion includes a review of transit vehicle operations and rider experience at the Montlake Triangle (or Montlake Multimodal Center).

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SDEIS Chapter 1, Introduction to the Project, described the Trans-Lake Washington Study, which was initiated in 1997 to examine a range of potential modes and routes for crossing Lake Washington, including high-capacity transit in the form of light rail or bus rapid transit. That study led to an extended series of environmental evaluations and planning studies, all with active public and stakeholder participation. In 2000, WSDOT, Sound Transit, FHWA, and the Federal Transit Administration initiated the Trans-Lake Washington Project EIS, which developed and applied screening criteria to the initial alternatives under consideration. The screening process reached the conclusion that I-90, rather than SR-520, would be the initial east-west corridor for high-capacity transit across Lake Washington. Since then, Sound Transit has moved ahead with its own environmental evaluation and design process for a light rail transit line, East Link, that will connect downtown Seattle with the Eastside communities and provide connectivity with Seattle-Tacoma International Airport via the existing Central Link light rail line. The 6-lane alternative evaluated in the SDEIS is designed to accommodate light rail in the future, should a decision be made to use SR 520 as a second high-capacity transit route across Lake Washington. Chapter 2 of the Final EIS provides further detail on the range of alternatives WSDOT considered, and why some alternatives were not brought forward for environmental evaluation in the Supplemental and Final EIS documents. Also see the Range of Alternatives and Options Evaluated Report (Attachment 8 to the SDEIS).

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mandating “a least cost planning methodology that identifies the most cost-effective facilities, services, and programs” (**each disregarded by this wasteful project**).

This remarkable hat-trick of misfeasance by breaching our state Constitution, substantive state HCT obligations and critical state planning duties, taken together, yields disastrous multibillion-dollar tax misuses passing off a mindless mix of political rhetoric endorsing “multimodal” transportation for misfeasant acts, which prevent essential connectivity, as bureaucrats rush to pile on another \$103.8 in new taxes to fill a huge void resulting primarily from refusals to fulfill direct least-cost-planning requirements easily honored through basic comparative cost-benefit analyses well understood, for at least 2,350 years, since Aristotle identified the importance of proper allocations of limited financial resources, in his *Politics*, and since his student, Alexander, revolutionized transportation planning by applying comparative cost-benefit principles in order, thereby, to systematize military transport.

The only means to rectify the worst transportation planning in the history of the state of Washington, **as made out by this project**, is through major revisions to correct ruinous failures from incompetent regional misplanning, thus far, so as to provide for optimal “multimodal” connections between multibillion-dollar SR 520 and Link light-rail facilities (as well as through reimbursements for **all** state funds misappropriated to this date, in violation of our state Constitution’s 18th Amendment, as legally required to avoid subjecting this badly conceived SR 520 muddle to constitutional litigation).

Respectfully submitted,

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