(Letter 1)
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Sent: Thursday, April 15, 2010 10:03 AM
To: SR 520 Bridge SDEIS
Cc: Fran Conley; Richard Conlin; Jonathan Dubman; Anita Bowers; Gary Stone
Subject: SDEIS response

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April 15, 2010

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C-023-001

We respectively submit this letter to describe the cumulative affects of the SR520 replacement project on the Hamlin Shelby neighborhood located on the west side of the Montlake Boulevard. The cumulative environmental, social, health, aesthetic and financial outcomes we foresee from the selection of Plan A or A+ will seriously affect the quality of life in our neighborhood, our health and the value of our homes. Plan K, M provide superior transportation benefits and would avoid the majority of these impacts. A smaller tolled-managed facility has not been considered but in our evaluation would avoid park and other impacts detailed in this report. Attached are responses to various technical discipline reports prepared by professionals and volunteers who live on Hamlin and Shelby Streets and by other organizations with similar interests to ours.

We agree with all of the SDEIS comments from the Coalition for a Sustainable 520.

C-023-002

Background:

The Hamlin Shelby neighborhood consists of 70 homes. Most of the homes were constructed between 1920 and 1940. The housing stock is of historic importance. It is frequently the destination for architectural and garden tours. The homes have been upgraded over the years but for the most part retain their original

C-023-001

Comment noted. However, since the SDEIS was published, FHWA and WSDOT have identified a Preferred Alternative that is similar to Option A, but includes a number of design refinements that minimize the effects presented in the SDEIS. These refinements have resulted from comments received from the public on the SDEIS and from WSDOT's work with project stakeholders under Engrossed Substitute Senate Bill (ESSB) 6392, which was passed by the Washington State Legislature in 2010. Please see Chapter 2 of the Final EIS for a description of the planning process and the Preferred Alternative.

The 4-Lane Alternative was considered in the DEIS but was found not to meet the project purpose and need. As described in Section 1.8 of the SDEIS and in Attachment 8 to the SDEIS, Range of Alternatives and Options Evaluated, the transportation analysis for the DEIS determined 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, after considering several comments on the SDEIS 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 fewer mobility benefits than the 6-Lane Alternative for both general-purpose traffic and transit, and that neither 4-lane alternative would satisfy the project purpose and need. Section 2.4 of the Final EIS provides more information about the analysis of these alternatives.

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The NEPA, Section 106, Section 4(f), and Section 6(f) processes required for the SR 520, I-5 to Medina project ensure a thorough assessment of potential project effects on the natural environment and the built environment. Cultural and historic resources are addressed

C-023-002 character with carefully designed remodels that are stylistically similar to their originals. The Montlake Blvd. and the Montlake Bridge were completed in 1925. They were originally designed to provide a cross canal connection to the University of Washington and to other points to the north. This changed in 1963. The Montlake Blvd. now doubles as both freeway access ramp and local arterial. No effort was made to mitigate the impact from the original SR520 project and all efforts today focus on fish, water and wetlands protection while failing to adequately address the human environment including the preservation of cultural or historic assets, noise reduction, property value impacts or health impacts from dust and tail pipe emissions. The SDEIS does not distinguish the unique differences between heavily urban and rural environments and the unique

C-023-003 opportunities and challenges presented by each. It treats wetlands as naturally occurring phenomena instead of as an accident of human intervention that it was. The SDEIS does not consider how intentional acts of human intervention could replace or restore these parks and wetlands through the thoughtful development of new parklands, lids and green space corridors that serve both the human and

C-023-004 natural environment. The traffic forecasts are based upon a complex and changing set of seemingly minor alterations to each alternative but with significant traffic effects for each. Because there is no "set" plan even within each SDEIS alternative, it is impossible for a reasonable person to understand what these traffic impacts might be. Plan A+, for example, has not been evaluated at all yet has been unofficially announced as the preferred alternative questioning the validity of the EIS process all together. There is no detailed analysis on the range of tolling strategies possible, however it is assumed that tolls will be used.

C-023-005 These impacts to the human environment were well understood in the 1950's when the City Engineer responsible for the 520 project proclaimed that the 520 project "would not be a pretty site." He later blamed the state for the design and the tolling authority that supervised this project. Then Community Development Director, John D. Spaeth stated that; "the bridge location violated the integrity of Seattle neighborhoods".

Today we have one alternative Plan A that further violates the integrity of Seattle neighborhoods but in spectacular fashion. Version 1.0 of SR 520 preserved the Montlake Bridge and adjoining neighborhoods. Version 2.0 in Plan A will seriously degrade the Montlake Bridge and diminish in value the neighborhoods that adjoin it by its shear size, scale and functional defects.

C-023-006 The eclectic style of architecture in the Hamlin Shelby Montlake subdivision features a mixture of stately homes and Craftman cottages. The neighborhood is well known in Seattle for its historic connection to the Montlake Cut, Opening Day of Boating season, its wide streets and parking strips, unique and period street lighting, a waterfront park that serves as a neighborhood meeting place and the historic Seattle Yacht Club that anchors the neighborhood on its western end. The charming and quaint homes resonate with everyone who visits here. It has long been considered one the most desirable neighborhoods in Seattle to live.

through NEPA and Section 106 (see the Final Cultural Resources Assessment and Discipline Report in Attachment 7 to the Final EIS). The project will avoid, minimize, or mitigate the adverse effect on these resources. Noise, air quality, and economic effects are addressed through the NEPA process. The project would reduce the number of residences in the Shelby Hamlin neighborhood at which noise levels exceed FHWA noise abatement criteria, compared to the No Build Alternative. Over the long term, the Preferred Alternative, in comparison to the No Build Alternative, would improve regional air quality. As documented in the SDEIS and Final EIS and in the Air Quality Discipline Report and Addendum (Attachment 7 to the Final EIS), criteria pollutant emissions with the project would be less than existing conditions by 2030. The value of real estate cannot be predicted with any certainty; thus assessing a project's effect on the value of private property would be speculative. The NEPA process avoids such speculation when supporting evidence is lacking.

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WSDOT will take every opportunity to incorporate new or enhanced park lands, lids, and green space into mitigation for project effects on parks and wetlands. Please see the Ecosystems Discipline Report and Addendum (in Attachment 7 to the Final EIS) for details about how wetlands and other natural resources have been addressed for the Preferred Alternative. Also see the Conceptual Mitigation Plans for wetlands and parks in Attachment 9 to the Final EIS, the Section 4(f) Evaluation in Chapter 9 of the Final EIS, and the Section 6(f) Evaluation summary in Chapter 10 of the Final EIS.

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The SDEIS provided a comprehensive analysis of effects based on the project definition, including a fixed set of options and sub-options. The analysis of traffic operations for the 6-Lane Alternative in the SDEIS and the Transportation Discipline Report was based on detailed information

C-023-006

Plan A and A+ will place pressure on the long-term sustainability of this intact neighborhood. Economic pressures threaten the up zoning of this property. The effects of a widened Montlake Blvd., degraded Montlake Bridge, the eight years to build out the Montlake interchange and Portage Bay Viaduct will diminish property values and attract real estate speculation to purchase and hold property for later conversion to higher density use. Rentals will replace owner occupied homes. The neighborhood will lose its most fervent preservation advocates – homeowners. Further pressure will result from the proximity to the University of Washington light rail station and from the University of Washington itself. Early signs of the conversion of homes to rental property have already begun. There are more rentals in this neighborhood than ever before. As the tipping point between rentals and owner occupied homes is reached, the loss of the historical importance of this neighborhood realized. It will be Seattle's loss. It is avoidable with Plan K, M and with a smaller tolled-managed facility.

C-023-007

Summary of Concerns:

Toll Managed 4-lane alternative: There is ample reason to believe that traffic volume constraints on I-5 and the lack of HOV connectivity to the express lanes in the evening or morning peak do not justify a six lane SR520 roadway. The SDEIS fails to evaluate a toll managed least impact solution that would avoid the significant impacts to linked parks and historic assets and destruction to wetlands and near shore environments that will directly affect the Hamlin Shelby neighborhood. This is a serious omission in the SDEIS that we believe violates provisions of the 4F section of the National Environmental Protection Act NEPA. The SDEIS does not consider lower impact alternatives that provide equivalent mobility benefits.

C-023-008

I-5 expansion? The SDEIS estimates an increase of 20,000 vehicles/day that cannot be assimilated into I-5 without the widening of I-5 along with modifications to the Washington State Convention Center. There is no assumption found in the SDEIS that includes a widened I-5.

C-023-009

Health Impacts: There is little information in the SDEIS that reflects the unique micro-climate found in the Hamlin Shelby neighborhood that is located in a depressed pocket behind a hill that shields the neighborhood from prevailing southerly winds that flush these air pollutants away. This is most noticeable during temperature inversions when levels of nuisance or toxic pollutants concentrate in this basin. New research has shown that a significant rise in cancers and respiratory illnesses are connected with proximity to highways even after adjusting this data for other causes. Plan A+ may increase both tail pipe emissions and road dust by placing an enlarged interchange upwind from many homes and on a major pedestrian and bicycle corridor. Plan K and M shifts this interchange further east away from most homes allowing prevailing winds to blow

and used validated models and standard methods.

The tolling rates and assumptions used in the analysis for the SDEIS were reasonable based on the findings of tolling studies. Information was provided in Chapter 1 of the SDEIS about tolling studies such as the 2008 SR 520 Toll and Traffic Revenue Report, The Tolling Implementation Committee, and the Lake Washington Congestion Management Project. These studies evaluated ranges of toll amounts and tolling scenarios, as suggested in the comment, and their findings are publicly available. The analysis in the SDEIS was based on Scenario 7 of the SR 520 Toll and Traffic Revenue Report. The analysis in the Final EIS is based on a similar rate structure to that of the SDEIS, however the toll collection assumptions were updated to reflect policy decisions that have been made since analysis was completed for the SDEIS.

More information about travel demand modeling and transportation analysis methodology is contained in Chapters 3, 4, 5, and 11 of the Transportation Discipline Report (Attachment 7 to the SDEIS) and the Final Transportation Discipline Report (Attachment 7 to the Final EIS). Please see the Final Transportation Discipline Report and Section 1.11 of the Final EIS for more discussion about tolling assumptions.

C-023-005

The National Environmental Policy Act of 1969 came into existence following increased appreciation for the environmental effects of projects with federal involvement. The NEPA process did not exist when the original bridge was designed. By following the NEPA process, WSDOT and FHWA are completing a full analysis of potential environmental impacts from the proposed project.

The Preferred Alternative includes a considerably larger Montlake lid than any of the SDEIS options. Running from Montlake Boulevard to the

C-023-009

pollutants away from homes to Union Bay. Also, a more intact lid without ramps and vehicle canyons will not allow pollutants to escape into the adjacent neighborhood in Plan K and M. The differences in lid design and interchange location between the alternatives from the perspective of air pollution impacts has not been evaluated in the SDEIS.

There is no long-term plan described in the SDEIS to monitor pollutant levels or implement mitigation measures should these levels exceed current or future acceptable limits. There are no plans to address air constituent levels should they exceed new standards as future studies redefine safe levels for air born substances. It is reasonable to request that on-going monitoring for the life span of this project be conducted to protect the health of nearby residents. Without independently verifiable monitoring of air quality and a mitigation strategy for correcting these problems, our neighborhood will likely experience an increase in health risks associated with this project over its 70-year lifespan.

C-023-010

There are no plans to provide on-going monitoring of the noise levels or mitigation plans to reduce noise levels. Noise, in general, has been found to contribute to stress, loss of sleep and other health related problems. There has been no study of these potential health impacts.

C-023-011

Montlake Lid: The SDEIS claims that all of the alternatives will provide reconnecting lids in selected areas throughout the SR 520 corridor. This will not be the case for Plan A and A+ as it relates to Montlake. The lid surface in Montlake will be used for general purpose and HOV ramps hence limiting most of its potential benefits. There is no definition of a "lid" in the SDEIS, but our definition is a quiet, peaceful environment suitable for passive recreational use. We estimate that 80% of the lid in Montlake will be unusable for this purpose. This was calculated by subtracting the width of ramps and vehicle canyons from the lid surface area and adding an additional 100% buffer to each ramp, roadway, or vehicle trench to reduce noise, smells and other nuisance substances from reaching people.

C-023-012

Bikes and Pedestrians: Plan A and A+ severely denigrates the pedestrian and bicycle environment of the Montlake Blvd. corridor from the University of Washington to East Lake Washington Blvd., the Arboretum and beyond. The widening of Montlake Blvd, increase in traffic, safety conflicts with notoriously dangerous slip ramps, a new HOV intersection in A+ will combine to create an unpleasant and hazardous experience in one of the most heavily used bike and pedestrian corridors in the city. Plan A and A+ routes bikes and pedestrians in non-direct ways to avoid these conflicts. There will be insufficient space to size an appropriate bike path on either side of the Montlake Blvd. south of the Ship Canal that does not conflict with sidewalks for pedestrian use. As cross-lake bike trips increase we do not see adequately sized bike trails to accommodate this demand in Plan A or A+. Alternatives K and M provide superior bike and

Lake Washington shoreline, the lid would provide better pedestrian amenities in the central part of the Montlake neighborhood, enhanced transit facilities, and better connections to the Arboretum, including a pedestrian crossing under the lid that would link the Shelby/Hamlin neighborhood to areas south of SR 520. It would also reduce noise levels in the area, as described in the response to Comment C-023-002. The lid and connections are described in Chapter 2 of the Final EIS.

Design features included in the Preferred Alternative that help reduce noise levels include noise reduction measures throughout the corridor, such as 4-foot concrete traffic barriers with noise-absorptive coating and a reduced speed limit on the Portage Bay Bridge. These noise-reducing design features would benefit the Shelby/Hamlin neighborhood. The design of the new bascule bridge across the Montlake Cut will be developed according to Department of Archaeological and Historic Preservation guidelines. The new bridge will be designed to fit the context of the area in a positive way and to be an attractive companion to the historic bridge.

C-023-006

WSDOT shares the Shelby/Hamlin neighborhood's concerns about the duration and intensity of construction in this area and will minimize effects on the neighborhood as much as possible. The Montlake neighborhood's cohesiveness and integrity have made it eligible for the National Register of Historic Places as a historic district. WSDOT, through the Section 106 consulting party process, coordinated with affected parties, including the Montlake Community Club, to identify ways to minimize and mitigate the effects of corridor construction and operation on historic properties. Please see the Final Cultural Resources Assessment and Discipline Report in Attachment 7 to the Final EIS. The consulting party process resulted in a Section 106 Programmatic Agreement (Attachment 9 to the Final EIS) that describes the results of the coordination with the Montlake community and identifies measures

C-023-012

pedestrian opportunities and do not require a second Montlake cut bridge to accommodate this expected increase in demand.

We believe the standards in the SDEIS for pedestrian and bicycle use do not reflect city or state goals for improving health or for achieving ambitious carbon neutral goals. We see the demands on the stretch of Montlake Blvd. from the Montlake Bridge to 520 for HOV, SOV and bikes and pedestrians will exceed the space available. The emphasis on roadways with only marginal or no improvements in north/ south mobility does not justify the priority given to vehicles over pedestrians and bikes.

C-023-013

Traffic: The SDEIS mentions a significant increase in HOV and transit use. Over one- third of all traffic on 520 today begins and ends their trip at the current interchange. With Plan A or A+ we would expect a dramatic increase in the use of this interchange as tolls on 520 provide incentives for HOV and transit use. We expect demand to increase with growth at the University of Washington projected to be 15% in the next 10 years, new mix-use development projects at and around the University Village area with large parking structures and the expansion of Children's Hospital at late stages of planning and approval. Should the HOV traffic increase on the mainline by approximately 20,000 vehicles per day (vpd) we would expect to see approximately one-third of these vehicles entering or exiting at the Montlake interchange in Plan A or A+ consistent with these trends.

But with bridge openings and signals north and south of the Ship Canal operating at (or near) a failure level of service we project that congestion will substantially increase. We predict that severe north-bound backups to match southbound backups will cause local transit to experience serious delays. A second Montlake Bridge provides only a 300 ft. advantage for buses coming off of 520 heading toward the UW but would do little for buses operating on 24th or Roanoke avenues. Moreover the destruction of historic homes, the degradation of an historic bridge, damage to the Montlake Cut, loss of the view corridor for the Montlake Bridge and the loss of historic homes to achieve a 300ft. advantage in mobility is not worth the impact. Plan K and M or potentially a toll-managed four lane facility would avoid these impacts and provide a faster and more reliable connection. Also analysis of signal priority for buses and HOV lanes to the north has not been examined in the SDEIS and could yield less damaging outcomes.

Traffic modeling is an unreliable way to evaluate alternatives when estimating traffic volumes on local streets including the Montlake Blvd. and Montlake Bridge. A far more reliable strategy for determining infrastructure needs for Seattle streets and bridges would be to accept the principal practiced in medicine to "do no harm". This would favor a more incremental approach where the mainline volumes can be measured in real world terms and modifications made as necessary (perhaps using tolling as a way to reduce infrastructure requirements) to accommodate unexpected demand or improve efficiencies in other ways.

that will avoid, minimize, or mitigate the adverse effect of the project on properties protected by Section 106. WSDOT is also developing a Community Construction Management Plan (outlined in Attachment 9 to the Final EIS) to address overall construction effects in the project area.

Please see the response to Comment C-023-002 regarding speculation about property values. The Shelby/Hamlin neighborhood is designated for single-family use in the City of Seattle Comprehensive Plan and is zoned for single-family use. If this neighborhood were to convert to higher density use, it would first need to be re-designated and rezoned. These processes are under the jurisdiction of the City of Seattle and would require environmental review under SEPA.

Analyses of the direct effects from the project on neighborhoods indicate that the Preferred Alternative would benefit community cohesion and would provide a social benefit through better access to transit and improved infrastructure for transit service (see the Social Elements Discipline Report in Attachment 7 to the SDEIS and the Addendum in Attachment 7 to the Final EIS). Cumulative effects of the SR 520, I-5 to Medina project, along with other projects such as the University Link light rail line and reasonable, foreseeable undertakings at the University of Washington, are evaluated in the Indirect and Cumulative Effects Discipline Report (in Attachment 7 to the SDEIS) and Addendum (in Attachment 7 to the Final EIS). Because the project would not have a long-term adverse effect on social elements, it would not contribute to a cumulative effect on this resource. When NEPA analysis of a project shows no direct or indirect effects on a particular resource, the project would not contribute to cumulative effects on that resource. The findings in the Final Indirect and Cumulative Effects Discipline Report about cumulative effects on cultural resources conclude that it is not anticipated that there would be sufficient loss of property from this or other reasonably foreseeable projects to reduce the significance of the historic district enough to affect its NRHP status.

C-023-013 Many toll amounts and strategies from fixed to dynamic tolling have been considered for SR520 but how they will work in real world terms is at best a guess. The degradation of the Montlake Bridge, converting an historic boulevard into a freeway spur, loss of historic homes, damage to the Montlake Cut are not guesses. They are real.

C-023-014 **Historic Assets:** Plan A and A+ calls for the addition of a new bridge parallel to the historic Montlake Bridge. We consider this intrusion as both unacceptable and unnecessary. The loss of the historical value, beauty and context for the Montlake Bridge is a clear violation of a number of provisions in the National Environmental Protection Act. This bridge is on the National Register of Historic places. It is designated by the City of Seattle and Washington State as an historic structure. It is the symbol used by the Montlake neighborhood that defines our community. It would also require the condemnation of historic homes, devaluation of many more, destruction of the historic Olmsted designed Montlake Blvd. and the significant loss of the aesthetic charm and character of nearby neighborhoods. WSDOT traffic analysis predicts that only marginal to no improvements in capacity over the no build option will result.

There has been no investigation into the use of bus signal priority strategies or the addition of Q-jump HOV lanes north of the Ship Canal to provide buses with priority crossing the Montlake Bridge that could avoid the construction of a second parallel bridge. Before the historic Montlake Bridge, Montlake Cut and Montlake Blvd. are degraded we believe that other feasible alternatives must be thoroughly investigated. Plans K, M and a toll managed four-lane alternative would avoid the damage to these important historic assets.

C-023-015 Noise: Plan A and A+ will not reduce noise from the Portage Bay Viaduct. There are no plans for quiet pavement. Noise walls on this bridge would be an unacceptable visual impact and may even amplify noise to nearby hillsides. The increase in noise on the Montlake Blvd. between the Montlake Bridge and SR520 is a known impact. Yet there are no stated plans for addressing these impacts for nearby homes.

C-023-016 **Transit Connectivity:** Plan A and A+ does not connect in an acceptable way two significant public investments in transit despite State law that requires a fast and reliable connection to the light rail station at the UW. Billions of dollars will be invested on 520 with a significant percentage of this devoted to improving transit performance. Sound Transit's north link light rail station at the UW is currently under construction. The connection between these two major state and regional investments requires the crossing of two bascule bridges that will frequently open for boat traffic. Plan A and A+ SDEIS findings claim that bridge openings and five signal intersections from NE Pacific St. to East Lake Washington Blvd. will not delay transit. We dispute these findings.

Please see the response to Comment C-023-001 regarding a 4-lane alternative. Through the analyses conducted for the SDEIS, WSDOT determined that Option K would result in more adverse effects on natural resources than Option A; see Chapter 2 for further discussion of how the Preferred Alternative was identified and Table 2-3 regarding design refinements that respond to public comments.

Chapter 2 of the Final EIS discusses the reasons that Option M, proposed during the legislative workgroup, was not considered a reasonable alternative. The primary reasons for its dismissal were environmental impact and cost. As stated in the findings of the legislative workgroup, "Because the Montlake Cut is an environmentally sensitive area, we believe the permitting of Option M's wetlands impacts will be very risky and very costly to mitigate and we believe there would be a high likelihood of a much longer delay (12 to 24 months) in order to negotiate the permitting issue with the US Army Corps of Engineers." Additionally, the Cost Review Panel was concerned that given the range of probable costs for Option M, it was unlikely to fit within the legislatively established budget for the project.

C-023-007

Only the No Build Alternative would avoid all use of Section 4(f) properties. The 4-Lane Alternative was evaluated in the Draft EIS but does not satisfy the project purpose and need. Please see the response to Comment C-023-001. The Preferred Alternative would result in the least harm to Section 4(f) properties and the least overall harm, compared to the other alternatives considered in the Section 4(f) evaluation (see the Final Section 4(f) Evaluation in Chapter 9 of the Final EIS).

C-023-008

The Transportation Discipline Report contained analyses of traffic

C-023-016

Plan A without the Arboretum ramps would further congest this stretch of roadway by adding significant volumes to the Montlake interchange. Plan A+ adds an additional signal intersection that would result in four interchanges in a distance of approximately 1000ft. from the Montlake Bridge to the East Lake Washington Blvd. signal. The SDEIS does not consider non-peak hours for transit use. We find this unacceptable when evaluating the long-term opportunities for transit service improvements in this corridor. The SDEIS peak hour definition does not reflect patterns of use associated with the UW, hospitals and major shopping center that do not adhere to normal 8am to 5pm work schedules. This analysis has been omitted in the SDEIS.

Our neighborhood will ever never be connected via transit service to our principal shopping destinations at the University Village with Plan A or A+. Metro and Sound Transit's near-term analysis does not see opportunities for extending service to NE Seattle. We reject this "assumption" as demand for access to the light rail station from the NE portion of the city will be significant and will certainly see major increases over the 70 year life span of this facility. Metro and Sound Transit argue that past trends dictate future patterns of transit use. They argue that NE Pacific St by the UW Hospital will remain the primary transit route with minimal demand projected from the NE portion of the City. We categorically reject this assumption because it is not based upon real data as buses are restricted from using the Montlake Blvd. corridor due to congestion. Without real data to test or even calibrate the demand models we believe these numbers are guesses and not reliable for planning purposes. Growth along the Sand Point corridor, changing public behavior that favors transit use, increased demand from a new light rail station at the UW justifies a thorough review of this analysis.

The mode shift from car to transit will become a clear priority for all of us and should be anticipated in the infrastructure needed to support this goal. Plan A or A+ fails to achieve an acceptable level of reliability for transit over other alternatives in the SDEIS. We question the underlying assumptions in the transit modeling that favors the delay caused by bridge openings and poor intersection performance over a fixed span alternative that connects directly to the light rail station at the UW. Plan K and M provide this direct connection.

We question the traffic forecasting that quickly produced more favorable drive times and general performance improvement for Plan A and A+ as the Legislative Working Committee appeared poised to select this alternative. We question assumptions being used when traffic results from a similar alignment, the Pacific Interchange Plan produced such dramatically better results than Plan K. The mediation members were not advised by WSDOT of the benefits of widening the Montlake Blvd. north of the Ship Canal while advising the supporter of Plan A and A+ that such widening would dramatically improve performance.

C-023-017

Parks: The potential for mitigation of park impacts or new park opportunities will be minimal with Plan A and A+. The retention of the loop ramp by the Hop In

operations and several I-5 interchanges with the SDEIS design options and with the No Build Alternative. The report stated that several bottlenecks along the I-5 corridor limit the amount of traffic that can access SR 520 (page 5-1). It also stated that I-5 traffic demand would increase up to 20 percent with the No Build Alternative (page 5-9) and that none of the SDEIS options would be able to serve all of the forecasted traffic demand because of congestion on I-5 and I-405 (page 5-21).

Exhibit 5-3 of the Transportation Discipline Report showed that daily vehicle demand volume on the SR 520 in 2030 would be 135,000 with the No Build Alternative, 131,000 with Option A, and 132,400 under Option A with suboptions. Existing volumes are 115,000. Thus, vehicle trip demand would increase with or without the project, and Option A would result in less demand than the No Build Alternative. Option A would also result in less demand than the other SDEIS design options. The effects of background population growth are not caused by the project; they are presented as part of the No Build Alternative analyses for 2030 and are not considered direct or indirect effects of the project.

The No Build Alternative and Preferred Alternative highway and street network assumptions for 2030 include only those projects that are planned and programmed in WSDOT's 2007-2026 Highway System Plan. Widening I-5 within the City of Seattle is not identified in this plan. However, Section 5.1 of the Final EIS and Chapter 5 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) describe traffic volumes and operations at the SR 520/I-5 interchange with the Preferred Alternative, and also include a discussion of operational effects on I-5 from the SR 520, I-5 to Medina project.

C-023-009

As stated in the SDEIS and Final EIS and in the Air Quality Discipline Report and its Addendum (Attachment 7 to the Final EIS), criteria

C-023-017

grocery store eliminates the connection between the Montlake Play field and the Arboretum. The lid over the 520 mainline will be crisscrossed with ramps and roadways eliminating this potential green space connection to the Arboretum. Our neighborhood access to the parks and other amenities will decline beyond current levels as the size of the interchange in Montlake increases and the experience of walking or riding a bike are degraded. A below grade crossing of the Montlake Blvd to extend the Dawson trail to the east represents a safety problem and should be rejected. The linked network of parks will be further degraded due to the scale of this project. Plan K, M and a toll-managed four lane alternative would avoid these impacts.

The SDEIS inaccurately claims that Plan K and M would require the taking of more park space than other alternatives. The analysis does not include the new park space created by a Montlake lid or the various connections between parks that Plan K and M will feature that Plan A and particularly Plan A+ will not. There is no qualitative analysis of the differences between the alternatives for parks that forecast potential use, popularity, quality of experience, connectivity and other factors. Many other aspects of this project are modeled including traffic, costs, air and noise quality etc. but no similar analysis has been made for parklands. Hence there is no qualitative assessment of the parklands only an assessment of the acreage removed from use. Moreover, there is no difference described in the SDEIS that distinguishes parklands removed temporarily for construction versus parklands removed permanently. Plan A and A+ do not replace park lands with usable spaces for human enjoyment. Plan K, M and a toll-managed four lane facility do.

C-023-018

Social Organizations: The Seattle Yacht Club is an important institution in our neighborhood. It is an historic building that anchors the west side of our neighborhood. It has not been mentioned in the SDEIS for the significant role it plays in humanizing an area located very near an active freeway. The proximity of the Portage Bay Viaduct and the low quality design considered in Plan A and A+ will degrade the Seattle and Queen City Yacht Clubs and could result in the decline of their business activities. This would result in the further decline in our property values should this facility no longer be viable or be diminished in popularity. The Seattle Yacht Club is the prime sponsor of the Opening Day of Boating season that is one of the most popular events of the year for everyone attracting on good days over 100,000 people. The loss or damage to this facility would be a loss to Seattle and negatively affect the future of this popular Seattle experience. The Seattle Yacht Club is among many reasons residents purchased homes in the Hamlin and Shelby neighborhood in the first place.

C-023-019

Access: There is no description of access changes to our neighborhood with Plan A or A+. We anticipate that with a widened boulevard and the heavy use by transit that we will experience additional wait times entering or exiting our neighborhood.

pollutant emissions would be less than existing conditions by 2030. The reason for not studying local air quality effects in the Shelby/Hamlin neighborhood was explained on pages 24 and 25 of the Air Quality Discipline Report (Attachment 7 to the SDEIS). A screening analysis was conducted to determine the five worst-case intersections. Those intersections were modeled, and none exceeded the National Ambient Air Quality Standards (NAAQS). The Montlake interchange was not among the five worst-case intersections. It was assumed that if the modeled intersections would not cause a violation of the NAAQS, then the other intersections in the study area also would not. The Air Quality Discipline Report Addendum (Attachment 7 to the Final EIS) confirms that no intersections or interchanges are expected to exceed the CO NAAQS under the Preferred Alternative.

Modeling completed for the Preferred Alternative shows that vehicle miles traveled would decrease compared to the No Build Alternative, resulting in a slight decrease in both criteria pollutants and mobile source air toxics.

Please see the response to Comment C-023-005 regarding a larger Montlake lid in the Preferred Alternative and the response to Comment C-023-006 regarding Options K and M.

C-023-010

As noted in the Noise Discipline Report, WSDOT took studies about effects of noise on sleep into account. FHWA's and WSDOT's standards for noise abatement and mitigation are intended to protect human health and welfare and are based in part on those studies.

The Preferred Alternative includes a number of noise reduction strategies that help reduce noise levels, such as 4-foot concrete traffic barriers with noise-absorptive coating and a reduced speed limit on the Portage Bay Bridge. Noise modeling that has been updated for the

C-023-020

NEPA Validity: High-level elected officials have stated that a decision has been made on SR520 to select Plan A+ before the results of the SDEIS public comments have been reviewed and analyzed. We consider this a violation of the NEPA requirements to fairly and objectively evaluate alternatives and we challenge the validity of the entire process for this reason. Further there is no known plan for SR520 that is coherent from east to the west. Each segment has conflicting goals that result in a confused set of objectives described in a SDEIS that a thoughtful person would be unable to properly understand or evaluate.

C-023-021

Walking: Walking to schools, the Montlake Playfield, the trails that connect west Montlake Park along the Montlake Cut to the Arboretum, the University of Washington, University Village and the walking experience many residence have as they cross the Montlake Bridge to work or attend classes at the University of Washington will all be seriously degraded with Plan A and A+. These impacts are all avoided with Plan K, M and a toll-managed four lane alternative.

The widened Montlake Blvd. makes crossing to the other side challenging and unpleasant. A second Montlake bridge creates another barrier along the Montlake waterfront trail to reach Foster Island. It will degrade this experience. A second bridge will degrade views from the Montlake Bridge to the east. Plan A will be produce a dehumanized and busy interchange in Montlake many times the size of the current facility and a toxic environment on the lid itself for human enjoyment. There will be less incentive for walking and bike riding and less incentive to visit the parks and other amenities currently enjoyed by the residents of Shelby and Hamlin.

C-023-022

Construction Impacts: The impacts during an eight-year construction period will be substantial. The use of the Montlake Blvd. and Montlake Bridge to handle the additional truck traffic will increase noise, pollution, dust and health risks. We believe that baseline evaluations of current conditions will provide a gage to measure the impacts during construction and provide compensation to homeowners who will be damaged by increased truck traffic, noise, property damage and other unknown or unanticipated problems common with projects of this scale constructed over such a long time period.

C-023-023

Conclusion:

The cumulative effects are substantial with Plan A or A+. They are largely avoided with Plan K, M or a toll managed four -lane alternative. The Hamlin Shelby neighborhood located to the west of the Montlake Blvd. is at ground zero for the impacts associated with Plan A and A+ and represents a substantial percentage of the overall impacts the Montlake Neighborhood will experience. We anticipate both short and long term declines in property values presenting the very real prospect of losing one of Seattle best collection of Craftsman architecture as property values diminish, speculation increases, owner occupied

Preferred Alternative indicates that these design measures would reduce noise levels along the corridor enough that noise walls would not be recommended in the Seattle portion of the project area, except potentially along I-5 in the North Capitol Hill area where the reasonableness and feasibility of a noise wall is still be evaluated. In the Shelby/Hamlin area, the high profile of the Preferred Alternative would provide further noise reduction. More information about the noise modeling results for the Preferred Alternative are in the Noise Discipline Report Addendum (Attachment 7 to the Final EIS) and in Section 5.7 of the Final EIS.

WSDOT's construction management procedures include steps to monitor and manage noise during construction, and those steps are described in the WSDOT Environmental Procedures Manual (available at http://www.wsdot.wa.gov/Publications/Manuals/M31-11.htm). At times, construction noise and vibration could be noticeable to area residents along the corridor. WSDOT will comply with local noise regulations, although some variances from the City of Seattle could be necessary to minimize the overall duration of construction. The Community Construction Mitigation Plan will also address noise in the project area. WSDOT will provide targeted public outreach for the properties that are likely to be affected by project construction. More detailed information will be provided to area residents as the project is developed.

C-023-011

Please see the response to Comment C-023-005 regarding the larger, enhanced Montlake lid that is part of the Preferred Alternative. The intent is to create better pedestrian amenity in the central part of the Montlake neighborhood while providing a better location and environment for the regional bus stops that will be incorporated into the transit/HOV direct access ramps (see Chapter 2 of the Final EIS). The lid would function as a vehicle and pedestrian crossing, a landscaped area, and open space. Design and treatment for the lid has been developed through the ESSB

C-023-023 homes turn to rentals and the people that advocate for preservation are gone – home owners. There will be an increase in noise on the Montlake Blvd from the additional traffic. This noise will project deeply into the neighborhood and will combine with the noise generated by traffic from the Portage Bay Viaduct. More traffic and buses (particularly while idling in backups from poorly functioning interchanges and metered ramps) will likely produce additional pollution that could affect our health. We believe our neighborhood is at increased risk for pollution caused disease. Studies to date have not analyzed our neighborhood microclimate nor has the state monitored all of the constituents that may increase health risks.

C-023-024 Access to our neighborhood is not detailed in the SDEIS. There are concerns that the increased use of the Montlake Blvd. as a freeway spur for buses and cars will change signal timing and cause additional delays in accessing our neighborhood in favor of maintaining traffic flow on the Montlake Blvd. There is

C-023-025 no consideration for sound walls or other noise abatement measures along the Montlake Blvd. despite the widening of this arterial, the visual blight it will cause and the increased noise levels from vehicles starting and stopping in the inevitable congestion caused by Plan A and A+. Plan K and M will significantly reduce all of these impacts and return the Montlake Blvd. to its historic use as a boulevard and not freeway spur.

C-023-026 We are concerned the about the shear size and scale of Plan A and A+ and the lack of emphasis on quality design in all segments of the project. The visual blight that the original architects of SR520 acknowledged will be repeated again and in a grander style. None of the structures in alternative A or A+ in scale and detail respect the natural or manmade landscape they will inhabit. Parklands will be quantitatively and qualitatively destroyed – all avoidable impacts with Plan K, M or a toll-managed four lane alternative.

C-023-027 The opportunity to create a continuous greenway that links together parks from North Capitol Hill to the Arboretum will be permanently eliminated. The social fabric of our neighborhood will be affected with a decline in the experience of walking, meeting neighbors and sharing the enjoyment of living in quiet and attractive residential neighborhood. Instead, our neighborhood will become a traffic island where the only safe and pleasant way in or out will in a car.

C-023-028 **Mitigation:**

We are requesting mitigation should Plan A or A+ be selected to address the noise, pollution, loss of property values and the short and long term loss of historic structures associated with this project. Mitigation measures will be expected to purchase homes so devalued by the project that investments are substantially lost, to purchase homes that cannot be sold at values equal to property values for equivalent properties to avoid speculation in these properties,

6392 workgroup process and other coordination with the City of Seattle and nearby communities.

C-023-012

The Preferred Alternative, with its revised and expanded Montlake Lid and additional design refinements in response to stakeholder input, would improve bicycle and pedestrian connectivity and safety in the Montlake area and across SR 520. With the project, improved bicycle connections would include the regional trail across the floating bridge, an undercrossing beneath SR 520 between the Arboretum and East Montlake Park, and an undercrossing beneath Montlake Boulevard connecting the new regional trail to the Bill Dawson Trail. The bicycle and pedestrian paths and connections that are part of the SR 520, I-5 to Medina project are described in Chapter 7 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS).

WSDOT has collaborated with the City of Seattle Pedestrian Advisory Board and Seattle Bicycle Advisory Board to develop design refinements that address bicycle and pedestrian connections and amenities. Recommended improvements that would be under City of Seattle jurisdiction include a connection between the regional trail on SR 520 and the second bascule bridge, which would include bicycle and pedestrian improvements along Montlake Boulevard. Bicycle and pedestrian connections are described in Chapter 2 of the Final EIS, and their effects are described in Chapter 7 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) and in the Recreation Discipline Report Addendum (Attachment 7 to the Final EIS). Also, please see the ESSB 6392: Design Refinements and Transit Connections Workgroup Recommendations Report in Attachment 16 to the Final EIS.

See the response to Comment C-023-006 regarding Options K and M.

C-023-028 to provide long term monitoring of air pollution levels that could trigger installation of filtration systems in homes to remove toxic particulates and to preserve the view corridor, context and historic significance of the Montlake bridge that would be irreparably harmed in Plan A or A+.

C-023-029 We do not believe that other alternatives including Q-jump HOV lanes north of the Ship Canal or signal priority for transit have been fully explored that would eliminate the need for a second Montlake Bridge. We will expect quiet pavement on all paved surfaces and cleaning of homes on a regular basis during and after construction. We expect triple pane windows and other noise abatement measures to be installed in homes that experience noise at current or higher levels. Sound walls along the Montlake Boulevard should be considered at the request of home owners facing the boulevard. This will no longer be the Montlake Blvd. in Plan A or A+ south of the Montlake Cut but the Montlake Urban Interchange Freeway Spur and the treatment on either side should reflect this change in use.

C-023-030 We strongly believe that Plans K and M or a toll managed four lane option (that has not been studied) would provide superior transit service, reduced impacts to the Hamlin Shelby Neighborhood and preserve historic assets. We believe Plans K and M would improve north and south mobility, reduce travel times to and from the north, create superior bike and pedestrian amenities along the Montlake Blvd to serve cross SR520 trips. Plans K and M would improve the experience of walking to the Arboretum or other destinations south of the Ship Canal. They would produce quieter and safer streets and connect directly transit on SR520 with the LR hub at the UW. We believe the impacts itemized in this letter and the accompanying responses to the discipline reports are avoidable with Plan K or M or a four lane toll managed facility.

We look forward to working with the state on the resolution of these issues.

Respectively submitted,

Rob Wilkinson
Hamlin Shelby Neighborhood Association
1837 East Shelby
Seattle, WA 98112

The Energy Discipline Report Addendum (Attachment 7 to the Final EIS) describes the greenhouse gas emissions effect of the Preferred Alternative. Compared to the No Build Alternative, the project would reduce greenhouse gas emissions in the project study area. Chapter 2 of the Final EIS describes the planning process for the Preferred Alternative, and provides further discussion of the project alternatives in relation to the NEPA analysis. Also see the discussion in Section 5.9 about how the project relates to regional goals to reduce GHG emissions.

C-023-013

Please see the response to Comment C-023-008 regarding the increase in traffic demand on SR 520, which would occur with or without the project. Exhibit 5-4 of the Transportation Discipline Report showed that daily HOV vehicle demand would increase by approximately 6,000 to 7,000 trips over existing conditions for all SDEIS design options, rather than the 20,000 stated in this comment. The increase in HOV demand would be accompanied by a similar decrease in general purpose demand. Traffic volumes in the SR 520/Montlake interchange area would be about the same as with the No Build Alternative and operations in this area would improve with the Preferred Alternative.

The Preferred Alternative would improve transit priority in the 23rd/24th/Montlake corridor by providing high-occupancy-vehicle (HOV) lanes on Montlake Boulevard between SR 520 and the Montlake Triangle. WSDOT included this feature in the Preferred Alternative as a result of discussions with King County Metro, Sound Transit, and the Seattle Department of Transportation after the SDEIS was published. Also, in preparing the analysis for the Final EIS, WSDOT reevaluated the study area for effects on local transportation.

The Final Transportation Discipline Report (Attachment 7 to the Final EIS) indicates that with the Preferred Alternative, transportation

C-023-031

(Letter 2)

Comments on the Supplemental Draft Environmental Impact Statement (SDEIS); SR 520 I-5 to Medina: Bridge Replacement and HOV Project Impact on Health; Neighborhoods Exposed to Potential Deleterious Air Quality

The SDEIS treats air quality in several sections that include estimated traffic volumes, measures of air quality and air quality models, and discussion of mitigation both during and up to many years after Project completion. The regulations governing air quality components are described and applied to current and projected air quality.

Conclusions discussed in the SDEIS generally find no levels of pollutants with potential deleterious effects on human health, both as measured currently and modeled at points after project conclusion.

The SDEIS notes several potential issues affecting future air quality:

Changes in the composition of fuels and vehicle exhaust components. Improved pollution controls and changes in fuels and/or power sources will reduce potential deleterious impacts from vehicle sources.

Changes in vehicle miles travelled and total vehicle trips (crossings) within the areas described. These changes are impacted by tolls, and changes resulting from HOV and transit substitution for driver only and low numbers of passengers in automobiles and trucks.

A recent (2010)Report from the Environmental Health Institute (reference below*, Introduction, p. 1-4) links traffic emissions with ambient air pollution, and concentrations of ambient pollutants with human exposure to pollutants from traffic with effects on human health. In the Executive Summary, (Overall Conclusions, p. xv), the evidence reviewed suggests that between 300 and 500 yards from major arterials there is a causal relationship between traffic –related air pollution and exacerbation of asthma. In addition, there was suggestive evidence that this pollution is potentially related to increased risk for several other diseases of the lung and cardiovascular system. The Report also noted that evidence used in coming to these conclusions was based on past estimates from emissions from older vehicles and might not be applicable for estimating health associations in the future.

The Air Quality Discipline Report (The Report) of the SDEIS found the Project is not expected to cause or contribute to any new violation of the National Ambient Air Quality Standards (NAAQS), has low potential for mobile source air toxic emissions (MSAT), and meets conformity requirements of the pertinent Federal and State regulations.

Studies were made of carbon monoxide (CO) concentrations at five intersections in the vicinity of the Project considered the worst-case intersections based on traffic delays and traffic volumes. The assumption was, if these intersections were shown as not violating the NAAQS, all intersections in the Project are would not cause a violation.

Several of the neighborhoods along Montlake Blvd and elsewhere in the Project area that are in close proximity to arterials and often congested during morning

operations would be improved in the Montlake area compared to the No Build Alternative. The second bascule bridge would create lane continuity between the Montlake Cut and the SR 520 Montlake interchange. The bridge would provide additional capacity for transit/HOV, bicycles, and pedestrians across the Montlake Cut. Most notably, overall delay related to bridge openings would decrease for all vehicles because the additional capacity would help clear congestion more quickly. The ESSB 6392 workgroup considered priority treatments for transit in the project area and the Montlake corridor. Since the SDEIS was published, WSDOT, in collaboration with the City of Seattle, King County Metro, and Sound Transit, has evaluated transit signal priority in the Montlake interchange area. Chapter 6 of the Final Transportation Discipline Report describes the changes in traffic volume and operations on the local streets in the Montlake interchange area with the Preferred Alternative. Chapter 7 describes the effects of the Preferred Alternative on nonmotorized transportation facilities and connections. And Chapter 8 describes the effects of the Preferred Alternative on transit service, facilities, ridership, travel times during a.m., p.m., and off-peak periods, and rider connections.

Traffic signal controllers would be installed with the capability to include transit signal priority where it is currently provided at the following intersections:

- Northeast Pacific Place/Montlake Boulevard Northeast
- Montlake Boulevard Northeast northbound at East Shelby Street

Existing transit queue jump lanes on Northeast Pacific Place eastbound (also for 3+HOV) and Montlake Boulevard southbound would be retained. Traffic signal controllers with the capability to include transit signal priority would also be provided at:

- Montlake Boulevard Northeast southbound at East Shelby Street
- Montlake Boulevard Northeast/HOV Direct Access road
- 24th Avenue East/HOV Direct Access

C-023-031

and afternoon peak traffic were not measured. The five intersections with 1 and 8 hour CO measurements and projected CO levels to 2030 were selected using a decision rule. Other methods of selecting sites for measurement and projected CO levels were not used.

Findings:

A recent extensive study of traffic-related air pollution examined the potential for illness related to living within 300 to 500 yards of major arterials. This finding indicates a need for caution in evaluating the future impact of traffic which may be increased and/or congested when the Project is completed. Documentation of exposure to deleterious vehicle exhaust for those living in proximity to this congestion will be important. Robustness of the models used in the DSEIS may be insufficient to point to dangerous exposures from vehicle exhaust. Use of different models, and/ or using different inputs including the important wait times during periods of traffic congestion, could be employed.

The Project will be in use for many years. Estimates of air quality in the future are only estimates. Many changes in vehicles, fuels, ambient air and climate in the Project area, miles travelled, global warming as this may affect local climates, pollutants and related can be projected, but assumptions vary widely and cause projections to have significant spread. The SDEIS discussed many of these potential variables, but how these may affect residents in proximity to the Project remains an open question. Further, intersections that were measured may not represent the neighborhoods most affected by vehicular air pollution when the Project is in operation.

Only CO was measured and modeled. There are a number of other emission components that can have adverse effects on health. As above, these were neither measured nor modeled.

The Report adhered to Federal and State air quality regulations. The scope of examination into air quality and its relationship to the Project was thereby constrained.

*HEI Panel on the Health Effects of Traffic-Related Air Pollution. 2010. Traffic-Related Air Pollution: A Critical Review of the Literature on Emissions, Exposure, and Health Effects. HEI Special Report 17. Health Effects Institute, Boston, MA

(Letter 3)

C-023-032

Mitigation Section of SR 520 DSEIS

1. For the West side, establish an LID or similar legal structure incorporating all neighborhoods within 300-500 yards adjacent to major arterials (or within areas determined to be exposed to traffic related air pollution). The LID will function to protect the air quality and mitigate adverse effects of air quality on the population within the LID. The LID will be funded by the Project. LID governance will be from the neighborhoods and established in the LID formation. Staffing and contracting to carry out the work of the LID will be determined by LID governance. The LID

Analyses presented in the SDEIS used accepted methodology based on WSDOT and FHWA guidance, as well as other guidance when applicable. The NEPA process analyzes the effects of a range of reasonable and feasible alternatives and No Build conditions. Based on this analysis, WSDOT and local agencies can determine which alternatives and design options satisfy the project purpose and need while minimizing negative effects, as well as when mitigation measures for transportation effects, such as changes to local infrastructure, are warranted.

The new bascule bridge could have an effect on the visual quality of the historic Montlake Bridge that would diminish the integrity of the bridge as a historic property, an effect on historic properties with a view of the new bridge that would diminish their integrity, and would require the removal of two residential properties that contribute to the Montlake Historic District. However, the new bascule bridge would not obscure the view of the original, and the context-sensitive design would limit the visual impact of the new bridge, thus minimizing any negative effects. The Section 106 Programmatic Agreement (Attachment 9 to the Final EIS) stipulates that the new bridge design must be in keeping with National Parks Service guidelines to minimize effects on the historic bridge. It also includes stipulations that will ensure mitigation of effects that could result from the new bascule bridge or its proximity to the existing Montlake Bridge. Please see the Visual Quality and Aesthetics Discipline Report and Addendum, and the Final Cultural Resources Assessment and Discipline Report, both in Attachment 7 to the Final EIS, for further information.

Please see the response to Comment C-023-006 regarding Options K and M and the response to Comment C-023-001 regarding a 4-lane alternative.

C-023-032

will have appropriate expert advisors and staff in those scientific and related areas for which the entity is responsible.

2. The LID will, with this expert advice, establish the sampling frame for measuring air quality effects from vehicle exhaust within the LID areas (baseline and regular monitoring as the Project is implemented and operational), contract for air sampling and findings, and use expert reviewers for analysis and interpretation of results. The LID will also determine traffic patterns on the major arterials, including wait times, and how traffic impacts air quality.
3. With expert advice, determine the health status of those living within the LID boundaries. The LID will regularly sample this population for the presence of adverse health effects (as recommended by experts) and which adverse health effects are related to, associated with, and/or causally attributable to reduced air quality caused by vehicle exhaust and other sources that impact on the air quality to which residents of the LID are exposed.
4. The LID will recommend ways of mitigating vehicle derived reduced air quality, when and where such reduced air quality is found. Mitigation may include modifications in air quality within homes in the LID area that bring air quality to acceptable levels, if feasible. Modifications may also include changes in traffic patterns, wait times, and related.
5. If air quality is compromised by traffic caused air pollution to the point at which mitigation methods do not bring the air quality for residents of the LID to acceptable levels, and adverse health effects of residents of the LID area are found or reported, and/or at the request of residents of the LID, the LID may purchase the property of residents at fair values to be determined by impartial valuation to be established by the LID. The Project will fund the LID, including, funds for this purpose. Properties so acquired may be sold, rebuilt, or in other ways disposed of with proceeds returned to the LID.
6. Adverse effects from vehicle caused air quality deterioration, including presence of increased levels of particulate matter, which cause damage to residences within the LID area, will be mitigated as determined by the LID and at the expense of the Project and included in funds made available to the LID.
7. Air quality standards change as information shows that changes in quality have adverse effects on health. For example, new information may indicate that components of vehicle exhaust not previously found to be injurious to human health are now determined to be injurious. Experts advising the LID will be asked to review such findings and recommend how these findings will change the above air quality sampling, the extent of the areas affected by these air quality changes, mitigation methods, and related. The LID will keep apprised of the state of knowledge about effects on air quality from vehicle exhaust and make

C-023-014

Please see the response to Comment C-023-013 regarding the benefit and effects of a new bascule bridge across the Montlake Cut, the response to Comment C-023-006 regarding Options K and M, and the response to Comment C-023-001 regarding a 4-lane alternative.

C-023-015

Please see the responses to comments C-023-002 and C-023-005. The Preferred Alternative would reduce the number of residences where noise levels exceed FHWA noise abatement criteria in the Montlake north area compared to No Build. This reduction is based on the revised profile of the bridge, a reduced, 45 mph speed limit on the Portage Bay Bridge, and 4-foot concrete traffic barriers coated with noise-absorptive material.

Quieter concrete pavement is included as a design feature for Option A, Option K, and the Preferred Alternative; however, because it is not an FHWA-approved mitigation measure and because future pavement surface conditions cannot be determined with certainty, it is not included in the noise model for the project. See Chapter 2 of the Final EIS for a description of the project and the design features that avoid or minimize noise effects. See also the Noise Discipline Report Addendum in Attachment 7 to the Final EIS.

C-023-016

Engrossed Substitute Senate Bill (ESSB) 6099, Section 6, required WSDOT, Sound Transit, King County Metro, and the University of Washington to plan for high-capacity transportation in the SR 520 corridor "…that ensures the effective and efficient coordination of bus services and light rail services throughout the state route number 520 corridor." A part of this planning also included the development of "…alternatives for a multimodal transit station that serves the state route number 520-Montlake interchange vicinity…." Together, these agencies

C-023-032 adjustments in its methods of maintaining surveillance of air quality and protecting the health of the LID population.

C-023-033 (Letter 4)
Linked parks and recreation areas near SR 520

Caveat: I am not a lawyer. My understanding is that federal Section 4f of the 1966 Dept. of Transportation Act as amended in 2005 says that a transportation project requiring the use of publicly owned parks, or recreation areas or wildlife areas, can be approved only if there is no feasible and prudent alternative to using that land and if the project is planned to minimize harm to the property. So the state must prove that reasonable alternatives have been evaluated and don't work. Section 6(f) gives additional protection to certain areas where federal funds have been used to create an amenity (such as the Arboretum Waterfront Trail) regardless of the land on which it resides.

I understand further that while the focus of the 4f law is on properties formally dedicated or operated as parks, recreational areas or wildlife refuges, a history of actual use of any public properties for these purposes can extend 4f protection to such public properties even though they do not have such formal dedication.

C-023-034 The numbers below tie to the Greenlink Map

(1) Interlaken Park at its south east end connects to the Arboretum. The SDEIS identifies it as a city park, and acknowledges that there are 4f issues because they plan to do some construction at Delmar which they deem not significant. They are focusing on curbing rather than on the treed area which will be disrupted by that construction. The SDEIS should have acknowledged 4f status to Interlaken for the more serious reasons stated below. At its north west end Interlaken Park links to

C-023-035 (**2) Bagley Park Overlook** which before 520 was built was part of Interlaken Park. Bagley Park is in daily use as a rest place and viewpoint, looking over Portage Bay to Lake Washington and the Cascades.

The SDEIS identifies Bagley as a significant city park because it has been so identified by the Seattle Parks Department and it historical significance. It will be excavated out of existence to handle the planned widening of SR520. The SDEIS does note that the taking of Bagley makes it 4F property and that it might be mitigated by creating a viewpoint on a new lid at that point. What it fails to note is that because Bagley Park is part of the historical and visual entrance path to Interlaken, Interlaken Park is affected by the Bagley removal and qualifies for 4f review for that reason as well as the reason given in the SDEIS.
Bagley Park links to

developed and agreed upon the options identified in the Final High Capacity Transit Plan (December 2008). WSDOT, the transit agencies, and other stakeholders met twice a month throughout the development and evaluation of the Preferred Alternative to identify design refinements that would ensure that these goals were achieved. In the ESSB 6392 Design Refinements and Transit Connections Workgroup, WSDOT collaborated with the City of Seattle, the University of Washington, regional agencies, including King County Metro Transit and Sound Transit, and other stakeholders to develop design refinements and transit connections for the Preferred Alternative (see the ESSB 6392: Design Refinements and Transit Connections Workgroup Recommendations Report in Attachment 15 to the Final EIS). See Chapter 2 of the Final EIS for a description of the Preferred Alternative and Section 5.1 of the Final EIS and Chapter 8 of the Final Transportation Discipline Report for a description of the effects of the Preferred Alternative on transit facilities, service, and connections in the Montlake interchange area. The Final EIS contains an analysis of transit travel times in the Montlake interchange area in peak and off-peak periods.

The analysis of effects is based on detailed information and uses validated models and standard methods. See also the response to Comment C-023-013 regarding transit operations with the Preferred Alternative and the response to Comment C-023-006 regarding Options K and M.

C-023-017

Please see the response to Comment C-023-005 regarding a larger Montlake lid and enhanced pedestrian amenities in the Preferred Alternative and the response to Comment C-023-006 regarding Options K and M.

The ESSB 6392 Design Refinements and Transit Connections

C-023-036

(3) Parklands East and (4) Parklands West
These areas, north of the fence line demarking SR520 right of way, have been maintained by the Seattle Park Department and Roanoke Park volunteers for a very long time; both areas were re-landscaped a decade ago by volunteers who worked with plans approved by the Seattle Parks Department. This land has been long considered part of Roanoke Park. They are definitely in the Roanoke Park landscape unit. Parkland West (4), adjacent to the fire station is on WSDOT right of way, but has been managed by the Seattle Park Department for more than a decade and also maintained by community volunteers. It is an open to the public area, and provides a visual landscape connection across Roanoke Street and Tenth Avenue East to Roanoke Park.

Parkland East (3), has also been managed by the Seattle Park Department also for more than a decade, is fully accessible to the public, provides a significant area for children as they wait for school bus pick up and drop off, and provides visual park continuity from Bagley to Roanoke Park. Part of (3) is owned by Seattle and part is owned by WSDOT.

The SDEIS shows most of Parklands East and West as WSDOT right of way and totally ignores their significance.

Because both Parklands (4) and (5) have operated as public park land and have been managed by Seattle Parks as Park buffer areas to the SR520 highway for 50 years with the support and agreement of WSDOT, they deserve 4F status.

The Parklands are across the street from

C-023-037

(5) Roanoke Park. Roanoke Park is a destination park for many people because of the beauty of its trees and gardens, which are maintained by neighborhood volunteers and the Seattle Parks Department. The original trolley line ran to, and ended at, Roanoke Park 100 years ago when it felt like country because there were so few homes in the area. The Olmstead Brothers in designing Interlaken Park envisioned Roanoke Park as a lovely gateway to Interlaken and, via the Bagley Stairs, (see below) to Portage Bay. These Park functions have been used as such for over 100 years.

The SDEIS shows Roanoke Park as a city park, and plots it as abutting the SR520 affected area but fails to give it the 4f status. Roanoke Park should receive 4f status because of the impact the proposed re-alignment of Tenth as it intersects with Roanoke, because the adverse impact destruction of Parklands East and Parklands West will have on noise from SR520, and because it abuts Roanoke Street which has been identified as a haul route. Roanoke Park will also be adversely impacted by the widening of SR520, which will leave the park much closer to the highway, and by the increased size and speed of the roadway and increased amount of traffic on flyovers.

Workgroup recommended further design refinements for the Montlake lid area. Those recommendations will be considered as design development progresses. Design of the below-grade crossing of the Bill Dawson Trail under Montlake Boulevard is being developed with consideration of community needs. Collaboration is ongoing among WSDOT, the Seattle Design Commission (SDC), City of Seattle, UW Architectural Commission, Arboretum and Botanical Garden Committee (ABGC), Seattle Bicycle Advisory Board, Seattle Pedestrian Advisory Board, and Seattle neighborhoods to establish goals, and suggest design treatments including those that would avoid or minimize negative effects to safety. Design guidelines will be developed consistent with crime prevention through environmental design (CPTED) principals related to lighting and visibility. This collaboration will ultimately result in a set of urban design guidelines that will inform and direct final design and construction of SR 520.

The analysis of effects on recreational resources and the Section 4(f) alternatives analysis were based on standard methodology for a highway project and are consistent with applicable policies and regulations. The SDEIS and the Section 4(f) analysis do, in fact, differentiate temporary and permanent effects to parks. WSDOT has coordinated with the agencies with jurisdiction over the affected Section 4(f) resources and will provide mitigation for the use of these properties. See the Final Section 4(f) Evaluation (Chapter 9 of the Final EIS) and the Recreation Discipline Report Addendum (in Attachment 7 to the Final EIS) for more detail about proposed mitigation for parks. Lids are not considered replacement property for mitigation of effects on parks, although they are design elements that would minimizes harm to adjacent resources.

C-023-018

WSDOT recognizes the importance of the Seattle Yacht Club to the Shelby/Hamlin neighborhood and the role it plays in humanizing the area near SR 520. As a result, the Preferred Alternative includes an alignment

C-023-037

The SDEIS proposes the Tenth Avenue to Delmar Lid as a solution to the noise problem in the area. The location of the lid will only partially protect Roanoke Park from noise. Given that there is no commitment in the SDEIS construction to any of the lids, it is critical that the adverse 4f impact to Roanoke Park due to the construction proposed be fully described in the SDEIS which now ignores them.

The SDEIS shows the connection between Interlaken and the Arboretum, but does not show or discuss the Interlaken/Bagley/Parklands/Roanoke Park Roanoke Park connection. The SDEIS fails to note that rebuilding the connection of Interlaken to Roanoke Park will also require the Roanoke lid, which is presented as an optional mitigation. Please see "Tenth Avenue to Delmar Lid Discussion " below.

Interlaken Park also links across 11th to the

C-023-038

(6) South Forest Area, south of 520 and within the SR520 right of way. These 50 year old trees are the result of remediation from the original construction. It is beautiful and mature landscaping. It is now an important visual and sound barrier, both from north Capitol Hill and from Bagley and Roanoke Parks and the adjacent Roanoke historic neighborhood. These trees offer important greenscape continuity. This is WSDOT right of way, some of which is well back from the highway now and also after the planned construction (all alternatives.) While it is fenced to keep the public from walking too close to the 520 highway, it is definitely in the visual landscape unit which extends from Interlaken.

The SDEIS describes this area only as WSDOT right of way. However, I believe federal law requires that since the public and park functions of this land are 4f functions, any diminishment of these lands and functions be evaluated in the SDEIS, even if WSDOT owns it and calls it right of way.

Also the SDEIS description of the WSDOT right of way is erroneous. Importantly, the actual WSDOT right of way property line between Tenth and Delmar is significantly further south than is described in the SDEIS, including the grassy verge that WSDOT maintains. This area connects visually to the

C-023-039

(7) North forest area on the north side of SR520, which is also adjacent to Parklands. Its 50 year old trees are the backdrop for the landscape from Roanoke Park. These are very important buffers to both Interlaken Park and to Roanoke Park, and without these trees the noise and pollution would be much worse in the Roanoke Historic District and in Roanoke Park. The north forest area is also part of the original grand entrance and connection between Interlaken and Roanoke Park including the Bagley Park transition.

Also, for all who travel across the Tenth Avenue bridge, the forests on both sides of 520 frame the stunning and unique East-West vista corridor, a tree-lined vista

shift to the south at the eastern end of the Portage Bay Bridge. This shift would benefit the Yacht Club by moving the highway farther from the club property. However, through the Section 106 consultation process, WSDOT determined that construction could temporarily diminish the integrity of the Seattle Yacht Club as a historic property. If not mitigated, potential access and usage limitations could have an economic effect on the club. If access and usage limitations caused a loss of patronage, the club's ability to manage its historic structure and conduct its traditional activities, which are protected as a character-defining feature under Section 106, could be affected. Measures to avoid, minimize, and mitigate these effects are stipulated in the Section 106 Programmatic Agreement (Attachment 9 to the Final EIS). Long-term or permanent negative effects are not expected on the Seattle Yacht Club or the Queen City Yacht Club, except that after construction is complete, support columns for the new Portage Bay Bridge would be located very close to the docks at Queen City Yacht Club. WSDOT anticipates the loss of one full boat slip at Queen City Yacht Club. Once completed, the SR 520, I-5 to Medina project will improve mobility, access, neighborhood connectivity, noise, air quality, and water quality in the project area. Please see the response to Comment C-023-002 regarding speculation about property values.

C-023-019

The Preferred Alternative would improve traffic operations in the SR 520 corridor as a result of improved shoulders, lane configurations, and ramp designs. This improvement would benefit traffic operations on Montlake Boulevard by reducing the level of congestion from SR 520 that affects Montlake Boulevard traffic flow. The Preferred Alternative would also improve access to SR 520 from Montlake Boulevard and from SR 520 to the north via the new bascule bridge, enhancing traffic circulation and alleviating some congestion in the Shelby/Hamlin area. In addition, the Hamlin Street U-turn would be removed and replaced with better access for northbound traffic. Section 5.1 of the Final EIS and Chapters 5 and 6

C-023-039

from the Olympic mountains to the Cascade mountains. The 50 year old linked forests of trees between Portage Bay and I5 are also part of a view corridor along SR520 which has significant value both to neighbors and to the many travelers on 520 and on the city streets.

Again, the SDEIS treats the area only as right of way, failing to reflect on the significance of a 50 year old stand of pines and other trees. Because of its connection function, I believe that both forest areas should have been listed as 4f property.

Both Interlaken and the Forest Areas have some areas too steep to walk on, and some with unofficial trails. The steep treed hills are part of the ambiance of the parks and make the walk or ride through the park the joy that it is.

C-023-040

Bagley Park also links to
(8) Bagley Stair Trail, used since 1908 as a treed parkland with a stair and path trail from the Bagley Park Viewpoint down to the waterfront, immediately north of SR 520. These stairs are used frequently by residents for a variety of purposes, including as a to-downtown- Seattle route that connects to Colonnade Park via Miller at 10th. The value of this connection to walkers will increase with the development of South Lake Union.

Historically, the Bagley Stair Trail has been maintained by both the Seattle Park Department and by volunteers with recent work by WSDOT on its adjacent right of way.

The Bagley Stair Trail will be destroyed by 520 construction. The mature trees that protect the neighborhood from 520 will go. The SDEIS Ch 2, page 2-9 indicates that the Bagley Stair Trail has been identified as important to local residents and suggests it might be rebuilt as part of the proposed new Delmar to Tenth lid, but it does not as a 4f item. We do not understand where the space to rebuild is; we do not know exactly where the new construction will stop. The SDEIS should have called out the Bagley Stairs as a discrete, historic 4F park feature with mandated replacement.

See also "Bagley Stair detail" below .
The Bagley Stair trail ends across Boyer street from

C-023-041

(9) Roanoke Street End Park is currently undeveloped, but has been eyed by the community as a developable area for many years, held back by years of failure by WSDOT to maintain its right of way in accessible condition. The City of Seattle and its residents value highly all points of public access to Portage Bay. The community has a history of turning these street ends into small parks, sitting and wildlife viewing areas such as the one on the other side of Queen City Yacht Club.

of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) describe improvements that are part of the Preferred Alternative in the Montlake area and their effects on traffic operations.

C-023-020

The NEPA process for the SR 520, I-5 to Medina project and other projects in the SR 520 Bridge Replacement and HOV Program has been consistent with the NEPA implementing regulations (40 CFR 1500 through 1508). WSDOT worked closely with FHWA to ensure that the both the SR 520, I-5 to Medina Bridge Replacement and HOV Project and the SR 520, Medina to SR 202 Transit and HOV Project satisfied the FHWA criteria for consideration as independent projects. According to 23 CFR 771.111(f), the purpose of these criteria is to "to ensure meaningful evaluation of alternatives and to avoid commitments to transportation improvements before they are fully evaluated." WSDOT and FHWA are confident that this requirement has been satisfied.

Section 1.7 of the Final EIS discusses the relationship of the SR 520, I-5 to Medina project to the other projects in the SR 520 Program.

Governor Gregoire and the Washington State Legislature approved Engrossed Substitute House Bill (ESHB) 2211 during the 2009 legislative session. This bill created the SR 520 Legislative Workgroup, a group of legislators and transportation officials that presented recommendations on financing and a westside design for the SR 520 corridor to the governor and legislature. The SR 520 Legislative Workgroup reviewed previous information and analyses conducted for the SDEIS and recommended Option A with suboptions (Option A+) in its December 2009 Recommendations Report. The recommendation was not a decision. A final decision on what alternative is selected will not be made until at least 30 days after a Notice of Availability for the Final EIS is published in the Federal Register. That is the earliest time

C-023-041

Roanoke Street is a narrow remnant as it reaches the water because most of it has been taken by WSDOT; the highway, supported on pillers is some 50 feet above. In other locations this type of access has been developed for boat launching, for example. Trees along the undeveloped remainder of Roanoke Street provide a SR520 screen to neighbors to the north. Roanoke Street widens in the water section. Queen city leases some of Roanoke Street for open moorage.

WSDOT plans to put a waste water treatment facility near this street end. Future construction should include plans to enhance public access to the water front at this location.

The SDEIS ignores this Roanoke Street End green space, which leads to.

C-023-042

(10) Portage Bay
Portage Bay is a major recreational area, used for swimming, boating, University crew training, sailing lessons, private canoes and kayaks as well as power boats, bird watching, nature walks, etc. The deep open water in the middle is owned by the State. The Bay is also the focal point of hundreds of houses on Capitol Hill, both north and south of 520, and of many people at the University of Washington.

Many people travel around it daily by foot or bike, or by road, or by water. Portage Bay is a destination recreation area for tourists, who are taken through on tour boats, and for many local day trips.

The proposed expansion of 520 would take property from Portage Bay, and would also reduce the public's ability to enjoy the remaining property, because of the added height and doubling of bulk, threatening shadows, and noise. The expansion will be detrimental to wildlife in Portage Bay. Please see "Taking of Portage Bay"

C-023-043

Along the west side of Portage Bay are a series of (**11) Street End Parks,** long acknowledged by the city as an important way for people to enjoy the waterfront. Edgar Street End park is adjacent to the Queen City Yacht Club. Hamlin Street End Park and Shelby Street End Park provide vistas out between the house boats and offer swimming and water access to neighbors as well as the houseboat residents. Neighbors have constructed and still maintain these parks.

(**12) South Portage Bay Park** has been recently developed by neighbors into a natural area with native plans conducive to birds and wildlife, and water access for canoes, etc. This area was acquired by the Park Department in 1968 as part of Montlake Park and has not yet been split out as a separate park by the Seattle Park Department. The SDEIS treats this area as part of Montlake Playfield Park, to which it is adjacent. Ignoring what has been going on in this area was a way for the SDEIS not to identify how important the park department and residents regard the wildlife and wetland and lake area. (See discussion below.)

that FHWA may sign its Record of Decision, which states what the agency's decision is and why.

C-023-021

Please see the response to Comment C-023-012 regarding pedestrian and bicycle improvements that are part of the Preferred Alternative. The project would improve conditions for pedestrians in the Montlake and Shelby/Hamlin areas. See also the response to Comment C-023-005 regarding the larger Montlake lid that is part of the Preferred Alternative, the response to Comment C-023-006 regarding Options K and M, and the response to Comment C-023-001 regarding a 4-lane alternative.

C-023-022

WSDOT acknowledges that construction will affect the natural and built environment in the project area and has identified best management practices and mitigation measures to reduce or minimize the effects (see Chapter 6 of the SDEIS and Final EIS). WSDOT has also developed a Community Construction Management Plan (Attachment 9 to the Final EIS) to address overall construction effects in the project area.The Final EIS and Construction Techniques and Activities Discipline Report Addendum (Attachment 7 to the Final EIS) contain updated haul routes and estimates of haul truck trips for the Preferred Alternative. Estimated truck peaks and averages represent a worst-case condition for each study location. Work sites could be accessed by more than one route, which could result in lower actual truck volume than the estimate during construction at some locations. In general, the estimated number of truck trips along arterials would be relatively low compared to overall arterial volume (see the Social Elements Discipline Report Addendum in Attachment 7 to the Final EIS). The truck volume estimates will continue to be updated as construction planning and scheduling are finalized, and WSDOT will work with the affected communities to avoid and minimize effects. See also Chapter 10 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for a more specific discussion

C-023-044

(13) Montlake Playfield Park is a major city park bordering Portage Bay, with activities ranging from a playfield to bird watching and canoeing and kayaking.

The SDEIS says the expansion will require 2.2 acres of new right of way in Portage Bay (Chapter 5 page 34, Table 5.2-2.) The SDEIS deliberately hides from whom that taking will occur but in fact most if not all will come from Montlake Playfield Park. In addition there will be need for significant construction right of way acreage to be "borrowed" from Montlake Playfield Park (See Chapter 6, Exhibit 6.2-2) In addition the construction activity of demolishing the existing bridge and building the temporary bridge and the new bridges will all take their toll on Montlake Playfield Park and represent constructive use which is not described in the SDEIS (See more discussion of these issues below in item (24) The Portage Bay Property to Be Taken

Montlake Playfield Park connects to the north to
(14) Portage Bay Park Area in SR520 Right of Way

The SR520 Right of way came out of Montlake Playfield Park property. The Park's history include a map showing SR520 and the wildlife areas along the shoreline with the notation of "Easement for Freeway" with the suggestion that it had restrictions on it and that the amount of land covered is 4.7 acres. (It would be interesting to see the exact nature of that transaction; King Country record maps do not note any restrictions on this right of way.) The existing bridge is 60 feet wide and the section of land that the city provided is some 1400 feet long, suggesting that bridge now covers only 2 acres, leaving 2.7 acres uncovered and not used by the bridge. That land has been used by the public as open space and by wildlife as open space and refuge for the last 50 plus years. I believe that qualifies it for 4f status. This land lies to the south of the bridge. (The expanded bridge will keep its southern presence and expand primarily to the north, doubling the amount of water covered.)

C-023-045

Montlake Playfield Park connects on its east boundary to the
(15) Bill Dawson Trail (a bike and pedestrian trail) which goes under 520, and leads towards the Arboretum, ending across Montlake Boulevard from the Lake Washington Parkway entrance to
(16) The Arboretum.

The Bill Dawson trail, at the Northwest Fisheries Science Center/NOOA property line is only a fence away from a route that would provide easy access to West Montlake Park. One of the possible applications of 6f mitigations should include a direct link to West Montlake Park from the Bill Dawson trail.

The Bill Dawson Trail now leads via Montlake Boulevard to **(17) West Montlake Park** and to the **(18)Ship Canal Trail** which connects to Foster Island and the Arboretum. The Bill Dawson Trail via the Montlake bridge connects to the public

about haul routes, volumes, duration, and scheduling.

Also, please see the Social Elements, Noise, Air Quality, Visual Quality and Aesthetics, and Recreation discipline reports and addenda and the Final Cultural Resources Discipline Report in Attachment 7 to the Final EIS for more information about effects from construction of the Preferred Alternative.

C-023-023

The effects mentioned in the comments would be considered direct effects, rather than cumulative effects, under NEPA and SEPA (please see the definition of cumulative effects on page 2 of the Indirect and Cumulative Effects Discipline Report). See C-023-006 regarding Options K and M, the response to Comment C-023-001 regarding a 4-lane alternative, the response to Comment C-023-006 regarding effects on the Montlake Historic District and mitigation for those effects, the response to Comment C-023-002 regarding speculation about property values, the responses to Comments C-023-002, C-023-005, C-023-010, and C-023-015 regarding noise, and the responses to Comments C-023-002 and C-023-009 regarding effects on air quality. After construction is completed, the project would reduce pollutant emissions and noise in the vicinity of the Portage Bay Bridge.

C-023-024

See the responses to Comments C-023-013 and C-023-019 regarding traffic and transit improvements and operations on Montlake Boulevard and the response to Comment C-023-019 regarding access improvements for the Shelby/Hamlin area with the Preferred Alternative. The project would result in improved traffic operations and access in the Shelby/Hamlin neighborhood compared to the No Build Alternative.

C-023-045

walkways along the north side of the cut, including the Burke Gilman Trail and distant points. This routing also makes for a nice loop walk around Portage Bay, a University Bridge to Montlake Bridge loop.

The Bill Dawson Trail (16) also leads towards, but stops a block away from, **(19) McCurdy Park,** and the adjacent (**20) East Montlake Park** which leads to the **(21) Arboretum Waterfront Trail** to Foster Island and the rest of the Arboretum (One can also cross Montlake and go to **(16) LAKE WASHINGTON Blvd** access into the Arboretum.

It is important to note that some of the WSDOT right of way in the Arboretum, **the RS Thompson area (22)** has been used as parkland for the last 50 years and is totally surrounded by parkland. It is also a very actively used area with a nice parking lot for easy access. Few, if any users of the parking lot and the walking area would perceive that this land was any different from Arboretum land and paths and trails interconnect. This land lies in direct view of the entrance sign to the Arboretum. I believe that much of the area within the WSDOT right of way qualifies for 4f status and needs to be treated that way. The SDEIS here as elsewhere treats WSDOT right of way as though it were already paved, land the state can do with whatever it wills.

C-023-046

(23) University Canal Lands
These lands with their mature and very beautiful landscaping offer a very important visual continuity to the trees which line Lake Washington Blvd, emphasizing that one is entering into Arboretum Lands. The loss of these lands is a significant loss to Lake Washington Blvd and should be identified as a 4f loss for that reason as well as the other reasons that have been identified. The impact of widening SR520 at Montlake Boulevard is severe because of the magnitude of the widening. It creates a major challenge to recreating an attractive entrance way to the Arboretum.

C-023-047

24) The Portage Bay property to be taken.
The expansion of the Portage Bay Bridge would require taking of Portage Bay Property. Except for tiny parcels at each end, the property needed by WSDOT is part of Montlake Playfield Park, managed by the Seattle Parks Department.

The proposed new Portage Bay Bridge design calls for taking out the current bend to the south made by the current bridge and expanding the total bridge width on the north side. WSDOT has lots of excess right of way to the south, so all of the new right of way needed is to the north. The expansion to the north runs the complete length of the bridge. The straightening causes there to be a thicker band of right of way taken on the eastern half than on the western half of the bridge (see dots on map.) This expansion of the right of way will require taking of Montlake Parklands.

C-023-025

Please see the response to Comment C-023-002 regarding traffic noise in the Shelby/Hamlin neighborhood. Compared to the No Build Alternative, the Preferred Alternative would reduce the number of residences in the Shelby/Hamlin neighborhood at which noise levels exceed the noise abatement criteria. The visual quality analysis found that vividness, intactness, and unity would not change for the Montlake corridor, although widening the roadway would remove mature roadside trees and shrubs that now provide a pleasant green edge. WSDOT would revegetate this area in a manner that is compatible with the character of the existing vegetation. Please see the response to Comment C-023-006 regarding Options K and M.

C-023-026

Development of the Preferred Alternative has been structured to incorporate public feedback into the design. Please see the response to Comment C-023-005 regarding the enhanced and considerably larger Montlake lid that is part of the Preferred Alternative and the response to Comment C-023-013 regarding the design of the new bascule bridge. WSDOT will develop context-sensitive designs for the Montlake lid, the new bascule bridge, and other areas of the corridor. Please see Section 5.5 of the Final EIS for measures that avoid or minimize effects on visual quality and aesthetics. See also the response to Comment C-023-017 regarding effects on mitigation for effects on parks, the response to Comment C-023-006 regarding Options K and M, and the response to Comment C-023-001 regarding a 4-lane alternative.

C-023-027

Please see the response to Comment C-023-005 regarding improved pedestrian connections with the Preferred Alternative and the response to Comment C-023-006 regarding the benefit to community cohesion. The Preferred Alternative is designed to provide better pedestrian, bicycle, and park connectivity than Option A. Also see the Recreation

C-023-047

But we should recognize that the non-bridged area to the south, even though it is owned by WSDOT also deserves qualification as 4f parkland. See **(14) Portage Bay Park Area in SR520 Right of Way** Seen this way, all of the expansion of SR520, whether to the north or to the south will be over parkland. It does appear, however, that most of the bridge expansion is to the north. None of the current coverage is given up so the shift north is totally additional coverage.

C-023-048

Under Option A, the "preferred alternative" the water acreage being covered by the bridge is being more than doubled (at the narrowest middle part of the bridge its width is only being increased 83 percent, but the road flares much wider toward both ends.) The SDEIS has deliberately hidden this information from the public and obfuscated and minimized it. It does not provide the calculation of current water coverage vs. the options being considered. It appears that the current bridge covers two acres of lake and the new one will expand primarily to the north for a total coverage of more than four acres (see item 14 above.)

C-023-049

The SDEIS has acknowledged that Montlake Playfield Park has 4f status because there will be construction occupation of a corner of the park. It should also acknowledge 4f status and review for the substantial taking of parklands, interfering with its use for the Parks' wildlife and recreational purposes both on water and on land. For example, both kayakers and beavers use the channels the beavers cut through the lily pads during the summer, channels cut above the "submerged" lands which the SDEIS describes as of no value. There is an active beaver lodge at the south east end of SR520. In addition to the general public, both Seattle Yacht Club and Queen City Yacht Club use the Montlake Park lands north of the current SR520 right of way in their recreational activities as well.

This water-parkland is used for water activities including canoeing, kayaking and swimming. It is also an integral part of the visual experience of being in Montlake Park, or the east side of Capitol Hill including all the parks there, and including West Montlake Park.

The SDEIS in its Discipline Report on 4 F Issues does acknowledge that it will take some Montlake Playfield Park lands, but doesn't identify where or how much. It also deliberately does not identify the submerged lands as parkland on any of its otherwise detailed maps and asserts that the taking is not of consequence and therefore it is not covered by 4f:

"Montlake Playfield originally extended north of the current SR 520 alignment. Because of the rising water level of Portage Bay, however, 6.8 acres of the original playfield (not included in the 27-acre usable site) are now submerged in Portage Bay. A portion of the submerged land would be acquired from the City of Seattle for the 6-Lane Alternative options. However, the affected submerged land is not currently used for recreational purposes, is not accessible to the public for recreational use, and is not designated as parkland on the *Seattle Park Guide* (City of Seattle 2006). In addition, there are no formal plans for its recreational

Discipline Report Addendum (Attachment 7 to the Final EIS). The opportunity to create a continuous greenway would be enhanced rather than destroyed.

C-023-028

Please see the response to Comment C-023-002 regarding long-term improvements to noise and air quality that would result from the project. Because of the noise reduction strategies included in the Preferred Alternative that would reduce traffic noise in the area, noise mitigation is not recommended. Because operation of the project would not cause adverse effects on air quality, no mitigation is proposed. See the responses to Comments C-023-002 and C-023-006 regarding property values and effects on historic resources. The response to Comment C-023-006 describes the Section 106 Programmatic Agreement and a Community Construction Management Plan (Attachment 9 to the Final EIS), which will contain measures that mitigate and minimize effects on historic properties in the Shelby/Hamlin neighborhood.

C-023-029

Please see the response to Comment C-023-013 regarding transit signal priority and the responses to Comments C-023-005 and C-023-010 regarding quiet pavement and the expected reduction in noise with the Preferred Alternative. Also see the response to Comment C-023-002 regarding long-term improvements to noise and air quality that would result from the project and the response to Comment C-023-028 regarding mitigation for noise. See the response to Comment C-023-019 regarding improvements in traffic operations on Montlake Boulevard with the Preferred Alternative.

C-023-030

Please see the response to Comment C-023-006 regarding Options K

C-023-049

use in the future. As a result, the affected submerged lands are not protected by Section 4(f)." Source: SDEIS Page 33 of Section 5, Discipline Report on 4 F issues.

C-023-050

This statement has several errors:
A. The statement that the lands "originally extended" north of the current SR520 alignment implies incorrectly that they no longer do! SR520's current acres of right of way across Portage Bay came out of Montlake Playfield Park holdings which now lie on both the north and south sides of WSDOT right of way.

B. The argument that the land became submerged and therefore useless is false. It was always submerged. And its "submerged" value was recognized when concern arose about the amount of the lake's surface being taken over by moorage and houseboats. This land was valued as preserving open water and valuable shoreline at the time of its acquisition in addition to its offering space for playfields.

C. While some of the ball playing area and track was expanded using fill, the objective was to increase the height and thereby drainage of the fields which were well inside the bounds of the wetlands. The actual wetland edge of the park remained unchanged according to park history. In any event filling of wetlands ceased everywhere, stopped some 50 years ago with the recognition by both citizens and the park department that all Wetlands had value. When Forward Thrust funds were used in 1968 to expand Montlake Playfield Park to the west, preservation of wetlands for wildlife was part of the master plan for that expansion, a mission being enhanced by years of work on the South Portage Bay Park area, planting more native vegetation and creating access paths and a canoe and kayak launch site.

D. The argument that these lands are not used is a SDEIS deception, as is the SDEIS' failure to show these parklands on the parkland maps provided of the area (only solid ground ownership is shown in most depictions). The water portion of the park is used extensively both visually by thousands of people per day, and on the surface by various forms of water recreation, and by wildlife.

E. The SDEIS paragraph quoted above argues that the Seattle Park Department thinks only of the solid land area of Montlake Playfield Park as being park land. It quotes the Park Department's 27 acre size statement as covering only the solid ground area; seeking to imply that the Park Department does not consider significant the submerged land ownership. However, my preliminary calculations indicate that one can only describe the park as being 27 acres by including the 6.8 acres which the SDEIS claims are the non-usable submerged lands. I believe that Seattle Parks has included the underwater area in its statement of the Park's size. (I am seeking confirmation from the Park Department.)

and M and the response to Comment C-023-001 regarding a 4-lane alternative.

C-023-031

Conclusions presented in the SDEIS and Final EIS concerning local and regional air quality are based on the quantitative modeling of criteria pollutants using standard methodology, as described in the Air Quality Discipline Report. Air quality is studied as part of an environmental impact statement for its effects on human health and other aspects of the environment such as plants, animals, and physical structures. The National Ambient Air Quality Standards (NAAQS) are established by EPA for pollutants considered to be harmful to public health and the environment.

As documented in the SDEIS and Final EIS and in the Air Quality Discipline Report and Addendum (Attachment 7 to the Final EIS), criteria pollutant emissions would decrease from existing conditions by 2030. A quantitative analysis of mobile source air toxics (MSATs) was conducted for the Preferred Alternative. The analysis found that all MSAT emissions will decrease in the design year compared to existing conditions. Modeling completed for the Preferred Alternative shows that vehicle miles traveled (VMT) would decrease compared to the No Build Alternative, which would result in a slight decrease in both criteria pollutants and mobile source air toxics.

A detailed analysis was performed for CO because the Puget Sound region is designated CO maintenance (formerly was not in attainment of the NAAQS). The CO analysis found that the CO NAAQS would not be violated as a result of this project. It was assumed that if the worst-case intersections did not cause a violation of the NAAQS, then the remaining intersections would not cause a violation of the NAAQS. The area is in attainment of the NAAQS for the remaining criteria pollutants. A project-level analysis for the other criteria pollutants is not warranted because a

C-023-050

The historic and continued efforts of the Park Department to facilitate preservation and access to these areas, with the creation of South Portage Bay Park and long planned improvements to Montlake Playfield Park, clearly demonstrate the "submerged lands" deserve 4F status.

F. The SDEIS is disingenuous at best in not describing in the Discipline Report on 4f the acreage of additional right of way that WSDOT will need to take from Montlake Park for new Right of Way. The taking of just one acre would legally require full review (See http://environment.fhwa.dot.gov/4f/4fmparks.asp) A comparison of Existing vs. Planned ROW is shown in Attachment 6 Draft 4f/6f Evaluation, Exhibit 28, Effects on Montlake Playfield. It is easy to see that more than an acre of land will have to be taken under Option A. A different part of the SDEIS implies the permanent taking will be on the order of 2.3 acres (See Discussion in Item (13) Montlake Playfield Park above.)

G. The SDEIS does not discuss the adverse impact increasing the height of the east half of the Portage Bay Bridge will have on Montlake Playfield Park. The current bridge is easily blocked by trees, and the sound transmission is much less than will occur at the planned new height. Further, there are no commitments to either sound mitigation for the new bridge, using sound walls or quiet pavement. It is a significant failure for the SDEIS not to quantify this adverse impact on Montlake Playfield Park, a serious 4f impact.

C-023-051

Notes on the proposed lid Tenth Avenue to Delmar
Care needs to be taken to manage the south to north transition of the lid, the transition from 11th and the end of Federal Street and the higher portion of the hill near 10th Avenue as the ground slopes to Roanoke Street. There is no discussion of the south to north transition issues the Tenth Avenue to Delmar lid will present although one of the objectives of the lid, besides noise containment, is described as bridging neighborhoods otherwise cut apart by SR520. The break is most significant north-south because SR520 lies in an East-West trench with few cross over points. Making that north south connection by using a lid to connect Federal Street to Roanoke Park, for example, would be very valuable.

Unfortunately, the SDEIS describes the Tenth to Delmar Lid and all other lids as at the discretion of WSDOT, not mandatory remediation. Further, the picture shown is a lid over the actual excavated area. This 1950's style design would leave walls on the north and south sides which would collect graffiti and ivy and areas for the homeless to occupy. It is critical that the importance of the connection of Roanoke Park to Interlaken be recognized so that the lid proposed is, A. Seen as mandatory, and B. Seen as requiring lid design integrated with wall design such that the walls will be able to hold fill stacked up against them (Meaning trees can be planted at the edges of the lid and the walls will disappear at surface level because they have been backfilled.), and C. that fill being removed as part of the construction be reserved for placement against those

new transportation project is not likely to cause a new violation of the NAAQS. Please see the responses to Comments C-023-002 and C-032-009 for more information.

C-023-032

Local Improvement Districts, or LIDs, are a tool for financing infrastructure and capital improvements. A LID allows a capital improvement project to be funded by a special assessment on the properties within the LID. The monitoring and other measures for addressing local air quality that are mentioned in the comment likely would not be eligible for LID funding, but some of these ideas could be funded by a privately formed community organization.
Operation of the project is not expected to result in negative effects to air quality. As such, no mitigation for operational air quality is proposed. Please see the responses to Comments C-023-002, C-032-009, and C-032-032.

C-023-033

Section 4(f) of the Department of Transportation Act of 1966 states that an agency can approve a transportation project that uses Section 4(f) land if the determination has been made that there is no feasible or prudent alternative to using the property. In addition to parks and refuges, the regulation also protects properties eligible for the NRHP. Please note that the definition of Section 4(f) protected properties does not cover all properties that may be perceived as parks, such as plantings in rights-of-way or informal open spaces not designated for park purposes. In addition, a history of informal recreational use does not necessarily qualify a property for protection under Section 4(f), particularly if the property was acquired and designated for transportation use.

Since the inception of the SR 520, I-5 to Medina: Bridge Replacement and HOV Project, WSDOT has evaluated a wide range of project

C-023-051

walls so that the hillside can be contoured as it was before SR520 was built. Done well, this will require negligible additional cost and will create usable recreation area equivalent to the current area of Roanoke Park. Keeping the fill near the site of excavation offers the potential to reduce adverse hauling impact on adjacent historical neighborhood as well as reducing excavation cost. Lids have weight constraints such that they are basically tree free. Tying the lid into the hill on an integrated basis will permit trees to grow near the edges of the lid and create a wonderful landscape as well as path transitions.

C-023-052

A major failure of the SDEIS is that it fails to acknowledge that under the No Build Alternative the landscaping would be preserved and the degradation of the adjacent Park areas by an expanded highway system would not occur. If the decision is to destroy what we have, then that destruction on and off right of way should be identified. That in turn should create a mitigation mandate, not a WSDOT option to mitigate which is what the SDEIS now describes.

C-023-053

Notes on the Bagley Stair Trail
This links along the remains of undeveloped Roanoke Street (9) immediately north of SR 520 to Boyer/Street. While this strip was once a street, it has been used since 1908 as a treed parkland, linking Roanoke Park to our waterfront parks using stairs and paths built 100 years ago and in continual use since! (See Map: Improvement of Shelby Street et.al. Grading etc. Local Improvement District No 1895, Approved by The Board of Public Works March 1908.) Stairs and pathways were constructed from 11Th Avenue at Bagley Park down to 12Th Avenue and its short leg north-east to Boyer, and also straight east to Boyer. (The stairway adjacent to Boyer was blocked off by a retaining wall on Boyer when SR520 was built and that last direct-to-Boyer section of the path from 12th Avenue along Roanoke Street fell into disuse. The community would like to see is that connection reinstalled.

C-023-054

(Letter 5)
Dear Governor Gregoire,

We are opposed to Plan A as described in the SDEIS:

I feel it is important to share with you our personal story in order to attach a family, a face, and a life to the decision the state is making purely on budgetary considerations. There appears to be no recognition for the people in our community or for the generations to come.

On August 5th 2009, our son Declan was born almost 6 weeks prematurely. Please see the attached photo. He spent close to one month in the NICU at Swedish fighting for his life. On an average day he would stop breathing up to 8 times and needed intervention. He was intubated, on a respirator, and feed by gavage. He will not be able to tolerate the air quality that will prevail in our

alternatives and options. Attachment 8 to the SDEIS, the Range of Alternatives and Options Evaluated report, described the evaluation process in detail.

As required under Section 4(f), WSDOT also evaluated whether there were feasible and prudent alternatives that would avoid the use of Section 4(f) properties. This evaluation was done both for the corridor as a whole and on a resource-by-resource basis, and was described on pages 121-133 of the Draft Section 4(f)/Section 6(f) Evaluation in Attachment 6 to the SDEIS. The analysis concluded that there were no feasible and prudent alternatives to the use of Section 4(f) resources. The design of the Preferred Alternative would result in the least harm to Section 4(f) resources, and the least overall harm, compared to the other alternatives considered in the Section 4(f) evaluation.

To properly determine and classify all Section 4(f) park properties that could be affected by the SR 520, I-5 to Medina project, WSDOT has engaged in consultation with FHWA, the City of Seattle Parks and Recreation Department, and the University of Washington. Throughout this process, WSODT has identified 11 park and recreation facilities that could potentially be affected by the proposed project and that are protected under Section 4(f) regulations.

As indicated in the comment, Section 6(f)(3) of the Land and Water Conservation Fund (LWCF) Act provides additional protection to certain recreational properties. Section 6(f) states that recreational facilities acquired and or developed using funds from the LWCF are protected from conversion to uses other than public recreation. Because the SR 520, I-5 to Medina project would result in a conversion of Section 6(f) property, WSDOT has worked to minimize harm to this property and has identified appropriate replacement property in consultation with the grantee agencies. The development of this replacement property as a public park would result in a net gain of 1.3 acres of Section 6(f)

C-023-054

neighborhood because of Plan A's short term and long term effects. The dust, particles, and unknown airborne elements during construction pose a huge risk. The general air pollution and emissions will be devastating. Declan has had breathing issues since birth. We simply cannot knowingly put our son in harms way.

We bought our home in 2005. In it is our life savings. We have 5 children and at the time considered this our best investment for our children and desired the quality of life Montlake offered them. My Husband and I made the very difficult decision to put our house on the market 3 weeks ago based on the extreme health related issues Plan A guarantees for our son and other children as well. We had to list our home at a price that is less than what we paid for it. We will not be able to sell it unless we take a huge financial hit. Every single realtor and potential buyer loved our home but used terminology such as "Black Plague" to describe our situation, based solely on the 520 initiative. If the state can give the University of Washington $500 million for inconveniences, then they can easily buy us out. Please let me know how to proceed to make this happen before construction begins. For those who elect to stay, we request compensation for lost property value, retrofitting of windows and an air filtration system to mitigate the harmful effects this project will bring.

It would certainly be a gesture of good faith and create positive press to a neighborhood devastated. A class action suit is inevitable unless you exhibit the leadership and take quick decisive action to do the right thing for the people you govern.

All construction options pose short term issues and disruption. The Pacific Interchange option and iterations of that would have a long term positive outcome for us, the city of Seattle and the state. I would think that simply retrofitting the 520 bridge would still be on the table as a viable option. At the very least until the state can afford to do this project the right way.

We are vehemently opposed to Plan A because it destroys the historical Montlake Bridge and surrounding homes, encourages 7000 cars daily on Montlake Boulevard, is designed with insufficient lids, and will ultimately not improve the congestion merging onto interstate 5. I know you are aware of all the logistical reasons this project does not work but I thought it was important to marry a human story with the tragic story of the 520.

I am also emailing this to Mr. Steve Ballmer so that he can better understand the harm that was done by one of his employees who lacks the understanding of this project and ignited an "us vs. them" scenario. Please see attached. I believe Mr. Smith is using his position to unfairly sway the masses to advocate for an unjust plan.

recreational space in the Seattle area. Please see Chapter 10 of the Final EIS for more information pertaining to the project's Section 6(f) process.

C-023-034

Since publication of the SDEIS, WSDOT has identified a Preferred Alternative and has updated the Section 4(f) analysis accordingly. The Preferred Alternative would not require permanent acquisition of land from Interlaken Park, nor would it require any temporary construction easements or clearing of vegetation. Because Interlaken Park would not be affected by the project, there would be no Section 4(f) use of under the Preferred Alternative, and therefore the park is not addressed in the Final Section 4(f) Evaluation.

C-023-035

Although Bagley Viewpoint connected to Interlaken Park fifty years ago, it does not exist in that condition today. The City of Seattle recognizes Bagley Viewpoint as a distinct recreational resource, and WSDOT has also evaluated it as an individual recreational resource. Under the Preferred Alternative and all options evaluated in the Draft EIS and the SDEIS, the project would require a full acquisition of Bagley Viewpoint, constituting a Section 4(f) use of 0.1 acre. WSDOT will construct a new viewpoint on the 10th Avenue East/Delmar Drive East lid that will recreate the experience the Bagley Viewpoint was designed to provide (see the Final Section 4(f) Evaluation in Chapter 9 of the Final EIS for further discussion). The City of Seattle Parks and Recreation Department and nearby neighborhoods will play an integral role in the planning and design of this replacement space.

C-023-036

The definition of Section 4(f) protected properties does not cover all properties that may be perceived as parks, such as plantings in rights-of-

C-023-054

This letter comes to you in order to illustrate the health risks that are eminent and potentially deadly for 1 of your youngest constituents. For what it's worth, my husband is a police officer and puts on a uniform everyday to serve and protect you, Mr. Ballmer, and the people of our state. I look forward to hearing from you on how you will uphold your oath to serve and protect us.

However dire our situation is, I understand that your job is to make decisions that benefit the majority. So please review with renewed concern how most aspects of Plan A are not only harmful to my family, but to the rest of my community. I would hate to see Montlake ravaged by an ill conceived plan and a short-sighted government. I would hope you feel the same.

Best regards,

Michele Love- Kane
1879 East Hamlin St.
Seattle, WA 98112

From: Brad Smith (LCA) **His email is:** bradsmi@microsoft.com
Sent: Tuesday, February 23, 2010 10:11 AM
To: All Employees of MS in Puget Sound
Subject: Replacing the 520 Bridge
Only rarely do we reach out to employees and provide information on public policy issues, but in this instance we felt it was appropriate to do so.

way or informal open spaces not designated for park purposes. For this reason, the areas described in the comment as Parklands East and Parklands West do not constitute a Section 4(f) resource. They are landscaped transportation rights-of-way that are not designated or programmed for park or open space use. Therefore, no analysis of avoidance or minimization alternatives is warranted.

FHWA and the agencies with jurisdiction over potentially affected recreational resources have coordinated closely with WSDOT throughout design and project development and concur that the resources discussed in the Final Section 4(f) Evaluation comprise all of the Section 4(f) resources within the SR 520 corridor. Please see the Final Section 4(f) Evaluation for more information about these identified Section 4(f) resources.

C-023-037

The historic Roanoke Park has been recognized by WSDOT, throughout the NEPA process, as an NRHP-listed and contributing resource to the Roanoke Park Historic District and as a Section 4(f) resource. In an effort to minimize project effects to the historic district and the park, WSDOT shifted the 10th Avenue East and Delmar Drive East lid slightly to the south, so that reconfiguration of the 10th Avenue East and East Roanoke Street intersection could occur without impacting the historic district's sidewalks or park.

Due to the design refinements of the Preferred Alternative that avoid direct effects to the Roanoke Park, along with the development and implementation of the Section 106 Programmatic Agreement, which resolves potential adverse effects, WSDOT has determined that the Roanoke Park Historic District and the contributing elements within the district would not be adversely affected by the project. For these reasons, the project would not have a Section 4(f) use of Roanoke Park.

C-023-054

One of Microsoft's top public policy priorities during the current legislative session in Washington State is the timely replacement and expansion of the SR-520 bridge across Lake Washington. More than 5,000 Microsoft employees use this bridge to commute to and from work each day. The current bridge is almost 50 years old, has twice as many vehicles using it as intended, and is overdue in its need to be replaced.

During the next couple of weeks lawmakers in Olympia will decide whether to continue to move forward with the work to construct a new bridge. Three years ago, the legislature approved a replacement design calling for a six-lane span – four general purpose and two HOV lanes – funded in part by state revenue and in part by tolls. Now the legislature will decide whether to start construction. While some work still must be done to finalize a compromise on the span's western configuration, we believe it's important to keep the project on track.

Because the issue is at a critical juncture, we're taking the unusual step of asking for your help in encouraging the legislature to keep the 520 bridge project moving forward. And even if you have a different view, as always we encourage everyone to share their views with their elected representatives. To learn more about the issue and how you can follow up, please click here: (http://520bridge.posterous.com)
Thanks.
Brad Smith
Senior Vice President and General Counsel

C-023-055

(Letter 6)
Summary of Development in the DPD record for The City of Seattle filed by 2009, within 3.6 miles of SR520 Interchange- Affecting east/west travel, and north/south travel on Montlake Blvd. Omitted in the SR520 SDEIS Cumulative effects Discipline Report of 12/09

1. Permit #3007521 Master Plan Expansion for Seattle Children's Hospital
   4800 Sandpoint Way NE, Seattle , WA 98105
   - submitted (corrected) on 08/03/07
   Proposed expansion of 1.3 million additional square feet
   by 2030, adding 400 additional patient beds and 1200 staff
   Parking stalls to increase to 3100 on campus
   Location: 2.0 miles from SR520 interchange
   Status: Seattle City Council Ruling expected April 1, 2010-construction anticipated 07/31/10

2. Permit #3008972 University Village Shopping Center Expansion
   4500 25th Ave NE, Seattle, WA 98105
   - submitted on 07-29-08
   Proposed expansion of 105,000 square feet of retail and restaurant space and additional 702 parking spaces

The Preferred Alternative and all options presented in the SDEIS would construct a lid at 10th Avenue East and Delmar Drive East. The SDEIS and Final EIS noise analyses have demonstrated that this lid would contribute to an overall noise reduction in the Roanoke Park and Portage Bay area. The Preferred Alternative would reduce the number of residences where noise levels exceed FHWA's noise abatement criteria in the Portage Bay and Montlake areas, compared to No Build. However, although the lid would provide noise reduction benefits, this is not its primary purpose. Other features of the project design, such as noise-absorptive traffic barriers and a reduced speed limit on the Portage Bay Bridge, would also help reduce noise levels in the area. Please see the Noise Discipline Report Addendum for more information (Attachment 7 of the Final EIS).

The lids identified in the Preferred Alternative are an integral part of the project. The discussion of deferred construction of lids that is quoted in the comment was presented in the SDEIS as part of the Phased Implementation Scenario. Nowhere did the SDEIS describe the lids as "optional"; rather, page 2-34 of the SDEIS stated: "It is important to note that, while the new bridge(s) might be the only parts of the project in place for a period of time, WSDOT's intent is to build a complete project that fully meets all aspects of the purpose and need."

The SDEIS discussed the possibility of constructing the project in separate phases over time, with the vulnerable structures (the Evergreen Point floating bridge, west approach bridge, and Portage Bay bridge) built first. This "Phased Implementation scenario" was analyzed for each environmental resource. Due to the funding shortfall, FHWA and WSDOT still believe it is prudent to evaluate the possibility of phased construction of the corridor should full project funding not be available by 2012. Currently committed funding is sufficient to construct the Evergreen Point floating bridge and landings; a Request for Proposals has been issued for this portion of the project, with proposals due in

C-023-055

Location: .8 mile from SR520 Interchange
Status-in for permit approval-construction by 12/10

3. Permit #3009681 QFC retail and residential units expansion
2746 NE 45th Street, Seattle WA 98105
-submitted on 05-22-09
Proposed expansion of 31,000 square feet of new retail development and 350 new residential units and 700 new parking stalls
Location .9 miles from SR520 Interchange
Status-in for permit approval-construction by 3/30/11

4. Warren G. Magnuson Park recreation development
Permits #3010260 (08/17/09), #6203388 (5/29/09) and 36223077 (08/04/09)
City of Seattle Parks and Recreation-approved 06/2009 and is under construction
7400 Sandpoint Way NE, Seattle, WA 98115
Arena Sports facility-80,000 square feet- 500 daily users projected
Tennis Complex-10 tennis courts and Clubhouse-100 projected users
Soccer and new lighted ball fields-12 fields X average 24 players= 288 users
North Shore Building #11- office/ daycare/ restaurant development 25,000 square feet projected 120 daily users

Location is 3.6 miles from SR 520 Interchange Status-construction in progress-anticipated completion by 12/2011

Total development is approximately 1,600,000 square feet, with increased daily vehicular trips of 3808 additional on Montlake Blvd (conservative estimates)
(sources:Seattle Children's Hospital 1200, Retail 2100, and Recreation 508 trips)

C-023-056

(Letter 7)
SDEIS Comment Summary
Chapter Report: Chapter 2. Alternatives

Chapter 2 Alternatives	2.11	Exhibit 2-6	Tony Oppermann	WSDOT claims the new highway will only be six lanes wide, but the Exhibit shows a diagram **9** lanes wide for Option A and **8** lanes wide for Options K & L.
"		Exhibit 2-9	"	WSDOT claims the new highway will only be six lanes wide, but the Exhibit 2-9 shows Option A on this Exhibit with a footprint of **14**

June 2011. Accordingly, this Final EIS discusses the potential for the floating bridge and landings to be built as the first phase of the SR 520, I-5 to Medina project. This differs from the SDEIS Phased Implementation scenario, which included the west approach and the Portage Bay bridge in the first construction phase. See Section 2.8 of this Final EIS for further information on potential project phasing.

However, whether or not the west approach and Portage Bay Bridge portions of the project are delayed, lids will be constructed together with the corresponding portion of the project, and will not be delayed or deferred. WSDOT will continue to work with Seattle Parks and Recreation, the Seattle Design Commission, and local communities on planning and programming for the lids.

The Final Section 4(f) Evaluation discusses the potential for constructive use under Section 4(f) with regard to the Roanoke Park Historic District as a whole. The analysis concludes that the proximity of the project would not substantially impair the features and attributes that make the district eligible for the NRHP. Please see Chapter 9 of the Final EIS for additional information.

C-023-038

Please see the response to comment C-023-036. As a transportation right-of-way not designated or managed for park use, the area referred to in the comment as the south forest area is not a Section 4(f) resource. As noted in the comment, WSDOT's limits of construction for this project area only extend partially into this area. WSDOT does not intend to remove trees in the southern portion of this area. The northern portion may experience some clearing, but it is likely that not all trees will be removed.

C-023-039

Please see the response to comment C-023-038. This area is not a

C-023-056

				<u>to 18</u> lanes wide, **255 feet wide! Four times the present width right in the middle of the residential area!**
"		Exhibit 2-10	"	WSDOT claims the new highway will only be six lanes wide, but the Exhibit shows from **<u>11 to 14</u>** lanes going through the Montlake area. **This is too large a discrepancy to allow WSDOT to proceed without major reductions in highway widths.**
"			"	General comment on Chapter 2. The present SR 520, four lane roadway is 60 foot wide or 15 feet per lane. Six, 12 foot lanes plus a six foot shoulder for both east and west bound roadways could be built on an 84 foot wide bridge. The present proposed roadway is 31 foot wider than necessary (at 115 feet). This width far exceeds the proposed, or claimed width of a six lane replacement. The proposed bike/pedestrian lane should be reduced from 14 foot to a more reasonable 8 foot width or about the width of the Burke Gilman trail as the use of the trail by pedestrians will not come near the foot traffic on the Burke Gilman.

Section 4(f) resource. The trees in this area are located within WSDOT right-of-way and would be cleared to accommodate the construction of a lid at 10th Avenue East and Delmar Drive East. The lid would reconnect neighborhoods on both sides of the corridor by facilitating bicycle and pedestrian crossing, and creating landscaped open space. The 10th Avenue East bridge would be replaced with a 100 foot wide structure as part of the new lid, and would include planter strips, sidewalks and shoulders. For those who travel across this new bridge, native landscape and views would still be prominent.

C-023-040

Please see the response to comment C-004-036. FHWA and WSDOT, in consultation with the Seattle Parks and Recreation Department, have determined that the Bagley stairs are not a Section 4(f) resource. Therefore, no analysis of avoidance or minimization alternatives is warranted. The stairs fall within WSDOT's limits of construction, and therefore will be closed while construction occurs in the area. WSDOT will restore the area when construction is complete. WSDOT will continue to work on the connection between the stairs and the 10th and Delmar lid.

C-023-041

The Roanoke street end is not currently used for recreation, and is not designated for future park development. Therefore, it is not a Section 4(f) resource, and no analysis of avoidance and minimization alternatives is required. WSDOT plans to use this area during construction, after which it would be restored and planted with native vegetation. The biofiltration swale proposed in this area (erroneously referred to in the comment as a wastewater treatment facility) would be vegetated and would have a natural appearance. WSDOT is exploring the possibility of providing public access in this area.

C-023-056

(Letter 8)
SDEIS Comment Summary
Chapter Report: Chapter 8: Other Considerations

Chapter 8 Other considerations	8.2	10-12	Oppermann	The existing four lanes of SR 520 are on a sixty foot wide roadway. A six lane roadway could therefore be built on a 90 foot bed (fifteen feet per lane). The WSDOT is telling us that the new bridge will 'only' be six lanes but they don't tell us that the roadway will be **12 to 14 "lanes" wide**. The true amount of surface area and actual widths should be delineated and shown so the public can see the real inpact to the area.

(Letter 9)
Discipline Report Comment Summary
Discipline Report: Water Resources

Report	Page #	Line #'s	Reviewer	Comment
Water Resources Discipline	3	Exhibit 1	Tony Oppermann	Not listed that should be: Jurisdiction: WA State Dept. of Fish and Wildlife. Regulations: Hydraulic Code of Washington. Purpose/Intent: Permit to "use, divert, obstruct or change any of the salt or fresh waters of the state.
"	8	1	"	Many design options have been proposed by the community, clear up to the K, L and M level. The so called "preferred option" is still the WSDOT plan with a + suffix. Since Alternative A is the original WSDOT design, I feel that WSDOT has not made an honest effort to consider any option other than their own.

C-023-042

Although recreational activities occur on and around Portage Bay, the bay itself is not a Section 4(f) resource. Through consultation with the Seattle Parks and Recreation Department, FHWA and WSDOT have determined that the submerged lands owned by Seattle Parks in the vicinity of the Portage Bay Bridge are subject to Section 4(f); however, the rest of the lake is not. The Final Section 4(f) Evaluation in Chapter 9 of the Final EIS includes an analysis of avoidance and minimization alternatives for these submerged lands, as well as measures to minimize harm. In response to general public concerns about the Portage Bay Bridge design, WSDOT has also reduced width of the new Portage Bay Bridge at the midpoint from 110 feet to 105 feet. To accommodate the bridge's footprint, WSDOT would acquire right-of-way to the north of the existing Portage Bay Bridge. The recreation analysis (see Chapter 5 of the Final EIS and the Recreation Discipline Report Addendum) demonstrates that this permanent acquisition would not affect any of the recreational uses of Portage Bay.

C-023-043

None of the street ends referred to in the comment would be affected by the project. As acknowledged in the comment, the City of Seattle has not identified the "South Portage Bay Park" as a separate facility from Montlake Playfield, and therefore this area has not been addressed as a distinct resource within the Final Section 4(f) Evaluation. The Montlake Playfield is a publicly owned, documented recreation resource of significance for the City of Seattle. Therefore, it is subject to the provisions of Section 4(f) and is addressed in the Final Section 4(f) Evaluation. Please see Chapter 9 of the Final EIS for more information. Please also see Sections 5.4 and 6.4 of the SDEIS and Final EIS for discussion of effects on Montlake Playfield.

C-023-044

Please see the response to comment C-004-092. A full Section 4(f)

C-023-056

"	8	Paragraph 2	"	Project Alternatives. This SDEIS does not really evaluate the real current alternatives!! It should address the A+ and the M alternatives. Much of the information in this document has already been reviewed and determinations made to either include, modify or delete elements of those previous alternatives. I would like to see a document that address the A+ and M alternatives.
"	10	Paragraph Seattle	"	Removal of the SR520 bus (flyer) stations will just throw X number of buses into the mixmaster at the interchange of SR 520 and Montlake Blvd. Montlake Blvd. between Pacific St. and SR520 will become a huge bus and vehicle parking lot! And will add several minutes to the bus commute from both the eastside and the University into Seattle and also the return routes. Flyer stations should be kept on SR520 and/or modified to provide service for people going to Seattle, to the north (I-5) and into the University area at Montlake.

analysis has been completed for the Montlake Playfield and is presented in Chapter 9 of the Final EIS. Since the SDEIS was published, FHWA and WSDOT have agreed, at the request of the City of Seattle as the agency with jurisdiction, to treat submerged parklands as Section 4(f) properties in the Montlake Playfield. The Final Section 4(f) Evaluation reflects this new approach.

WSDOT has worked closely with FHWA, which administers Section 4(f), on the characterization of uses under this regulation. FHWA and WSDOT have determined that the Montlake Playfield would experience a direct use (i.e., an acquisition of property) as a result of the Preferred Alternative and all options evaluated in the SDEIS. If there is a direct use of a Section 4(f) property, the analysis does not go on to consider constructive use as defined by 24 CFR 774, since the direct use triggers the need to consider avoidance alternatives and measures to minimize harm. WSDOT has worked closely with the City of Seattle as an agency with jurisdiction over Section 4(f) resources in evaluating impacts and developing mitigation measures for these resources.

A portion of the area located to the south of the existing Portage Bay bridge is not recognized as part of the Montlake Playfield and does not receive protection under Section 4(f). During construction, it would be occupied by work bridges during construction of the new structure. However, there would be no permanent right-of-way acquisition in this area and no permanent negative effects.

C-023-045

The Preferred Alternative would not result in a substantial impairment of the Bill Dawson Trail. As an active member of the project's Parks Technical Working Group, the Seattle Parks and Recreation Department has helped to develop a plan for the trail. During construction, WSDOT will provide a user-friendly construction detour for cyclists and pedestrians, using on-street and sidewalk connections between

C-023-056

"	11?	Exhibit 6	"	The basic problem here is that you have a lot of traffic going north and south intersecting with a lot of traffic going east and west. Alternative A(+) keeps all this traffic in **ONE** location, Montlake Blvd. from Pacific Street to SR520. A giant mixmaster! Options K and L (and M) dilute this mess (thus decreasing the problem) over three locations and allows individuals options that will allow them to get to where they want to go without dealing with ALL the other vehicles (including buses that no longer stop on SR520 but have to go into the mixmaster too).
"	12	5-6	"	A transit only off-ramp from west bound SR 520 would do nothing to help traffic going north on Montlake Blvd. If west bound traffic wanting to go north on Montlake Blvd. (a large volume) is required to exit in the Arboretum, the traffic in the neighborhood of the proposed off ramp will be horrible – likely service level FFF from the day it opens. (Also, the affect on a beautiful old residential area would be devastating.) There would likely be a steady load of traffic on Lake Washington Blvd. during daylight hours from the exit to Montlake Blvd. and then on the Blvd. to the north and south.

Montlake Boulevard and Montlake Playfield. Following construction, WSDOT will replace the affected portion of the Bill Dawson Trail (with a slight realignment to accommodate for the new corridor and stormwater pond) in a manner that complies with the standards of the Americans with Disabilities Act and corrects current flooding and encroachment issues. The trail would continue to provide a north-south pedestrian and bicycle connection underneath SR 520 from Montlake Playfield to the Montlake Boulevard area.

The Preferred Alternative reduces land acquisition in the Washington Park Arboretum compared to the SDEIS design options and mitigates for that land both through measures identified in the Arboretum Mitigation Plan and through the creation of a new public park under Section 6(f) of the Land and Water Conservation Fund Act. The Preferred Alternative would also eliminate the existing Lake Washington Boulevard ramps and reduce traffic on Lake Washington Boulevard through the Arboretum. Please see Chapters 5, 9, and 10 of the Final EIS for additional information.

As noted in responses to previous comments, FHWA, the Seattle Parks and Recreation Department, and WSDOT have concurred on the lands to which Section 4(f) is applicable in the project area. The existing WSDOT right-of-way containing the R.H. Thomson ramps (also area known as the "WSDOT peninsula") is not a Section 4(f) recreation property. It was purchased for transportation purposes and still contains operating transportation facilities. The agreement between WSDOT and the City of Seattle regarding this WSDOT right-of-way holds that, while the state allows Seattle to use and maintain portions of the property for park purposes, the property remains under WSDOT ownership and must be relinquished within 90 days if WSDOT needs it for transportation purposes. (See page 30 of the Cultural Resources Discipline Report). Both FHWA and the U.S. Department of Interior have concurred that the

C-023-056

"	12	8-10	"	Another bascule bridge in the middle of this mixmaster would only serve as a parking area for the increase in traffic that will occur in this area, not to mention the destruction of an historical Seattle view point and the loss of two fine homes. Again, traffic would not flow any faster or efficiently because of the intersection at Pacific Ave. and the load of traffic from the bascule bridges to SR 520.
"	12	24-30	"	A suboption to A proposes, essentially to move the existing on and off ramps to and from SR 520 to the west. This is a horrible proposal!! The existing ramps should remain in the same location as present (and rebuilt in the same location if necessary). Placing these ramps to the west, as shown on some plans, puts them virtually in the front yards of several very fine, older (historic) homes. The present location is in the Arboretum which is not ideal but creative mitigation plans (landscape and vegetation) can be developed that would reduce the present inpact on the site.

peninsula property is therefore not subject to Section 4(f) as a recreation property.

C-023-046

WSDOT has determined that the Canal Reserve land is eligible for listing in the NRHP, and the State Historic Preservation Officer has concurred with this finding. However, FHWA has concurred that the property is not a significant public park because it is located within WSDOT right-of-way. Because the Canal Reserve land is not a recognized recreational resource, it is not a Section 4(f) recreation property. The Canal Reserve land is discussed as a contributing element to the Montlake Historic District in both the Final Cultural Resources Assessment and Discipline Report (Attachment 7 of the Final EIS) and in the Final Section 4(f) Evaluation (Chapter 9 of the Final EIS). Therefore, as required by Section 106 and Section 4(f), WSDOT will minimize project impacts to the Montlake Historic District and its contributing elements and provide mitigation under Section 106. WSDOT has proposed mitigation for impacts to Section 4(f) resources. Under the Preferred Alternative, this area would be developed as part of the Montlake lid, which would provide landscaped open space, would restore and create views and would facilitate pedestrian and bicycle connectivity to and from the Arboretum.

C-023-047

Please see the responses to comments C-023-042 through C-023-044. To improve mobility across the corridor, the Portage Bay Bridge would be expanded proportionately north and south from the existing centerline at the western abutment of Portage Bay. At the midpoint of the bridge, width would be added north of the centerline, and at the eastern end of the bridge, width would be added north and south, although the alignment would shift slightly south to avoid the NOAA Northwest Fisheries Science Center campus.

C-023-056

"	12	30-35	"	A suboption to A proposes an eastbound onramp to SR 520 from the Montlake Blvd. bridge over the highway into the (left hand) HOV lane. Left hand on and off ramps have always been traffic headaches (e.g. the Mercer St. off ramp from northbound I-5). This would also require installation of another traffic light in an area already burdened with too many.
"	13	22	"	A suboption for K would construct a 'right turn only' off ramp from eastbound SR 520 to southbound Montlake Boulevard. After casual observation of this intersection for 40 years, it appears this would be unnecessary and would certainly not be cost beneficial.
"	13	35-38	"	"Suboptions for Option L would include adding a left-turn movement from Lake Washington Boulevard for direct access to SR 520 and adding capacity on northbound Montlake Boulevard NE to NE 45th Street". There is no explanation or diagram that I could find that explains this statement.
"	77	12	"	Why dissolved zinc would increase only in Options K and L is not explained.

The need to acquire new right-of-way to the north will be mitigated through the project's Section 4(f) process, and in coordination with the City of Seattle. There would be no permanent acquisition of the area to the south of the Portage Bay bridge, and no permanent negative effects. The area would be restored after construction is complete.

C-023-048

Table 5.2-2 of the SDEIS indicated that construction of a new Portage Bay Bridge under options A, K and L would acquire additional right-of-way totaling 2.2 acres, 1.75 acres and 0.85 acres, respectively. The graphic depictions located directly above this table demonstrate that the right-of-way acquisition is almost exclusively to the north of the existing SR 520. Using the information available at that time, WSDOT did not consider this area as part of the Montlake Playfield because it is was not designated as park land by the City of Seattle, and therefore did not attribute this as a use of Montlake Playfield. Acreages in the Final EIS have been revised as necessary to reflect consideration of the submerged lands as park lands.

Exhibit 28 of the Draft Section 4(f)/6(f) Evaluation (Attachment 6 of the SDEIS) depicted the proposed use of the Montlake Playfield, with the playfield boundaries recognized by WSDOT at that time, for options A, K and L. The Draft Section 4(f)/6(f) Evaluation also evaluated the use of this playfield under each option. The Final Section 4(f) Evaluation includes evaluation of the submerged land areas subject to Section 4(f), as identified through consultation with the City of Seattle.

C-023-049

Please see the responses to comments C-023-042 and C-023-044 for a discussion of submerged lands.

The Draft Section 4(f)/6(f) Evaluation did document the use of Montlake Playfield. Please see Exhibit 28 and the discussions beginning on pages

C-023-056

"			"	General comment. Options K, L and M all provide relief for traffic flowing through this area. They siphon off some of the vehicles from the main heavy flow and allow them to bypass the interchange at SR 520 and Montlake Blvd. thus avoiding having to deal with every vehicle that travels through this intersection. Option A+ pours all the traffic from all directions into one small area which can only slow everything down.

C-023-057

(Letter 10)
Comments regarding the Visual Quality and Aesthetics Discipline Report contained in the SR520 Bridge Replacement SDEIS

The Visual Quality and Aesthetics Discipline Report (VQADR) begins with the statement that "The construction and modification of our roadways, which are publicly owned, can considerably affect the quality and character of the landscape". Living as we do in one of the most beautiful natural settings encompassing a metropolitan area, this statement should remind us, as we contemplate building one of the area's largest and most expensive physical structures, that design quality and sensitivity to the landscape should be paramount concerns.

As a Montlake resident and former director of the Henry Art Gallery at the University of Washington, I have watched with interest and trepidation as various options for SR520 have been explored. As a member of the Seattle Arts Commission for 6 years, I also represented the Commission on the Light Rail Review Committee. This committee reviewed the station designs as proposed by Sound Transit, providing input on aesthetics and design issues. As is the case with SR520, the design parameters of the light rail stations were necessarily constrained by engineering requirements. However, Sound Transit wisely sought to balance engineering concerns with aesthetic interests and conducted design competitions for the individual stations. The result is a series of stations that are functional and beautiful.

While the VQADR provides a dispassionate and lengthy analysis of the effects of the bridge options on the visual quality and character in the 520 corridor, the conclusions (like the photographs in the illustrations) are made at such a

63 (Option A), 84 (Option K) and 97 (Option L) of the Draft Section 4(f)/6(f) Evaluation for a description of the construction easement that would be located within the Montlake Playfield.

C-023-050

Please see the response to comment C-023-049. The design of the Preferred Alternative avoids effects to wetlands and wildlife wherever possible. The Ecosystems Discipline Report Addendum (Attachment 7 of the Final EIS) demonstrates that the Preferred Alternative has a smaller loss of wetland and wildlife habitat (from vegetation removal and shade) than the options evaluated in the SDEIS. Vegetation removal in the Portage Bay area, which would affect wildlife and habitat, is less with the Preferred Alternative than the SDEIS options. Please see the Ecosystems Discipline Report Addendum (Attachment 7 of the Final EIS) for additional information.

The Visual Quality Discipline Report and Addendum (Attachment 7 to the Final EIS) discuss the potential visual effect of the new Portage Bay bridges from Options A, K and L. The visual quality analysis concluded that a higher structure would not change visual quality around the Montlake Playfield, because the bridge is already the dominant structure in this area. The Preferred Alternative would have similar visual effects as the SDEIS options, which would be small because shoreline trees provide seasonal screening. Additionally, the wider column spacing and greater height of the bridge would allow more open view under the bridge. Under the Preferred Alternative, noise in the Portage Bay area, including at the Montlake Playfield, would decrease compared to existing conditions, as demonstrated in the Noise Discipline Report Addendum (Attachment 7 of the Final EIS).

C-023-051

The primary purpose of the proposed lids is to reconnect communities and landscapes by creating open space, restoring or creating views, and

C-023-057

distance that it is, in fact, very difficult to make an informed judgment about the aesthetic impact of the designs. A constructed object of this scale is too large to be considered from a single vantage point and the report appropriately selects numerous vantage points for analysis, using the Federal Highway Administration visual quality assessment method. The problem with this approach is that it neglects, in the end, to consider the design as a whole. If one thinks about great bridge experiences, while in transit or viewed at a distance, it is the design as a whole that registers, something much more than the sum of individual vignettes.

Little in the report suggests that the design of the bridge will be the result of a design competition or other effort to ensure that the team responsible for building the structure, one we will drive on and look at for generations, is concerned as much about the enduring quality of the design, as the enduring elements of the construction. After all the years of discussion, it would be an appalling turn of events to build the floating equivalent of the Alaskan Way Viaduct on Lake Washington. The report's illustrations of a new floating bridge sitting on ten-foot tall columns and extending 22 feet higher than the current bridge (not including sound and view blocking walls) uncomfortably echo the profile of the Viaduct. A positive comment tucked in the report, suggesting that boater's views will be improved by the elevated structure, is a bit like saying that pedestrians on First Avenue in some parts of downtown Seattle have a nice view of Elliot Bay, neglecting the fact that pedestrians a bit farther uphill have a splendid view of elevated concrete.

If Option A is the current frontrunner, there are significant visual quality and aesthetic impacts to be considered:

The expanded breadth of the bridge and the interchange would, as noted in the report, significantly reduce open space and restrict views in the Portage Bay and Montlake landscape units, particularly if sound walls extend the height of the highway and ramps.

The report states: "If the design of the Portage Bay Bridge is noteworthy and architecturally appropriate in terms of style and scale for the setting, vividness and unity would remain high, and intactness could increase. On the other hand, a design that does not consider style or scale may adversely affect visual quality". So, how is this design quality to be guaranteed? Who will champion this necessary design quality?

The negative aesthetic impacts of the massive new interchange are considered in some detail. The lid sounds nice, but unlike Option K, divides rather than unites the adjacent communities. There is not enough detail in the VQADR to visualize the labyrinth of on and off ramps, flyover ramps, and thruway that crisscross the Portage Bay and Montlake landscape units, as well as the lid itself. There are enough cautionary comments in the report to make one uneasy about the potential for a design mess at the Montlake Intersection: intertwined car, bike,

enhancing bicycle and pedestrian movement. Although the lids would provide noise reduction benefits, this is not their primary purpose. The lids and landscaping designs will respond to topography, vistas and views, as well as to neighborhood and historic contexts. Development of design guidelines will include the work of bridge designers, architects, landscape architects, lighting designers, and other specialists who will assist in the preparation of final design packages for the project. Additional design development for the lid will include coordination with the City of Seattle and surrounding communities. The lid would include context-sensitive landscaping, to visually fit with the adjacent Roanoke Park Historic District, and this landscaping would include trees to enhance visual appeal.

See the response to Comment C-023-037 regarding revised potential phasing and the timing of lid construction. Lids are integral to the project design and would be constructed at the same time as the section of the SR 520 corridor in which they are located (e.g., the Montlake lid would be completed at the same time as the Montlake interchange improvements). This was true for the Phased Implementation Scenario as well. WSDOT has never proposed to defer the lids until after completion of the SR 520 roadway improvements. See Chapter 3 of the Final EIS for a discussion of construction sequencing with the Preferred Alternative.

C-023-052

Throughout the NEPA document, the No Build Alternative provides a set of baseline conditions. Under the No Build Alternative, existing parks and landscaping would continue to operate in their current condition, with increased use expected as the local population increases. However, as discussed in Section 1.9 of the SDEIS, the remaining design life of the Evergreen Point Bridge is currently estimated at just 10 to 15 years, and a severe storm could cause it to fail even sooner. The Portage Bay and west approach bridges are also vulnerable to collapse in a severe

C-023-057

transit and HOV lanes covering a large area and only partially obscured by a lid structure.

The addition of a second bridge adjacent to the historically significant Montlake Bridge is a negative from a design standpoint as the current bridge is appropriately scaled for the Cut and can be viewed from the east and west. A second bridge will block the view from the east and undercut the visual strength of the single historic bridge. The widening of Montlake Boulevard to accommodate thousands of additional cars for the new bridge turns a boulevard into a highway ramp and does severe damage to the visual "intactness" of one of Seattle's oldest neighborhoods, as well as the transition to the University of Washington.

Well designed bridges do more than go from point A to point B, they marry science and art to create a structure that adds to, not subtracts from, the beauty of the world. Every time we deposit a toll, we will be reminded that we are paying for this structure. Shouldn't it be a goal for this project that the 520 bridge is worth paying for because it looks good and is a pleasure to cross? The VQADR points out the many beautiful elements surrounding the bridge: Lake Washington, Mt. Rainier, University of Washington campus, and downtown skylines. A well-designed bridge needs to measure up to these surroundings and, perhaps, like the Golden Gate Bridge, become a source of regional pride. The financing of this bridge depends on tolls from commuters, occasional users, and tourists. There is a psychological difference between paying a fee and buying a ticket, the former feels more like a tax, the latter more like paying for an experience. The language of the VQADR is mostly that of "mitigation" (of effects along the corridor) and is strikingly lacking in aspiration for a bridge design that holds engineering and aesthetic interests as equal values. Our goal should be to create a bridge that people will want to cross, not have to cross, because the experience of traveling on the bridge, as well as viewing it from afar, are points of pride for all involved.

Richard Andrews
andr49@earthlink.net

earthquake. For these reasons, the No Build Alternative is inconsistent with WSDOT's standards for safety and reliability. Given the vulnerabilities of the existing SR 520 bridges, the No Build Alternative is not a prudent scenario.

In accordance with federal policies, including NEPA and Section 4(f) of the Department of Transportation Act, WSDOT has minimized impacts to the fullest extent feasible and included mitigation as an integral element of project development. The Preferred Alternative has the least impact on parks and recreation of any alternative evaluated that meets the project's purpose and need.

C-023-053

Please see the response to comment C-023-040.

C-023-054

This set of comments is a duplicate of comments submitted separately by Michele Love-Kane (Comment Letter I-291). Please refer to Comments I-291-002 through I-291-007 for responses.

C-023-055

The purpose of identifying reasonably foreseeable actions is to determine the cumulative effect on a resource, rather than to create a comprehensive list of projects. Council on Environmental Quality (CEQ) and WSDOT guidance does not provide explicit requirements for how to identify other present and reasonably foreseeable actions. Rather, it allows agencies to determine the level of analysis appropriate for their projects. The CEQ guidance does not require an inclusive list of projects, but instead suggests evaluating both individual actions, when they are reasonably well known, and groups of actions, which are typically included in documents such as transportation plans and master plans.

C-023-058

(Letter 11)
Jenifer Young
SR 520, I-5 to Medina: Bridge Replacement and HOV Project
Environmental Manager
SR 520 Project Office
600 Stewart Street, Suite 520
Seattle, WA 98101

Dear Ms. Young:

We thank the Washington State Department of Transportation for the opportunity to comment on Supplemental Draft Environmental Impact Statement (SDEIS) dated January 22, 2010 for the SR 520, Interstate 5 (I-5) to Medina: Bridge Replacement and High-Occupancy Vehicle (HOV) Project (also referred to as the SR 520, I-5 to Medina project)

We would like to comment on a number of items that we perceive as impacting our property and comment further on impacts to the environment of Portage Bay. We would like to comment on a number of items that we perceive as impacting our property and comment further on impacts to the environment of Portage Bay. Unfortunately in the absence of more construction detail the omissions and lack of specificity in the SDEIS have made it difficult to understand all the potential effects of the project.

Despite the vagueness of the present information about your project, we know enough to have significant concerns. Your project will impact each of our activities for numerous years of construction, and negatively impact our ability to attract and retain members. We will expect WSDOT to mitigate those impacts. We have grave concerns about the permanent impact of the project on our facility and business and we call on WSDOT to work with us to identify ways that such impacts may be avoided.

Queen City Yacht Club (Queen City) understands that the 520 bridge needs attention and is willing to work diligently and in good faith with WSDOT to create a safe and efficient solution to its many problems. If our concerns are considered in moving forward during the design phase we believe that many of the impacts to Queen City can be materially reduced or mitigated. If our concerns are not addressed at the design phase, on the other hand, the impacts to Queen City could be extremely severe, and could place us in a position of having to defend our ability to survive, to both our detriment and the detriment of the project.

BACKGROUND:

We are enclosing our October 25, 2006 SR 520 DEIS Comment Letter, which will provide you with background on Queen City and its concerns with this project.

The SDEIS included an extensive group of reasonably foreseeable future actions (projects). In the Final EIS, WSDOT determined that, consistent with the CEQ and WSDOT guidance, most of these projects would be more appropriately evaluated within groups of reasonably foreseeable actions. To identify groups of reasonably foreseeable actions, WSDOT relied on adopted regional and local land use and transportation plans, consistent with CEQ guidance. These plans provide information on the intended development of jurisdictions and transportation networks over a long planning horizon, encompassing multiple future projects that collectively have the potential to influence resource trends.

These regional planning documents (such as PSRC's Vision 2040 and Transportation 2040), local planning documents (such as the City of Seattle Comprehensive Plan), and master plans (such as the Seattle Children's Hospital Major Institution Master Plan) provide estimates of future growth and development that encompass many individual projects. Therefore, it is appropriate for the cumulative effects analysis to rely on these planning documents in identifying regional trends rather than to attempt to catalogue all foreseeable projects in the region. In this way, actions such as future development at University Village and others mentioned in the comment, although not evaluated individually, were considered as part of the trends affecting the resources into the future.

In the SDEIS, the reasonably foreseeable actions were presented on maps. In the Final EIS, the projects are presented in a list for greater clarity. See Chapter 7 of the Final EIS for further discussion of how reasonably foreseeable actions were identified.

C-023-056

This set of comments is a duplicate of the comments submitted separately by Paula and Tony Opperman (Comment Letter I-312). Please refer to Comments I-312-093 through I-312-105 for responses.

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Queen City is a nonprofit organization founded in 1916 making it one of the oldest civic organizations in the City of Seattle. It purchased its property on Portage Bay in 1934. Our facility consists of our clubhouse building, landscaped grounds, paved parking lot and a marina consisting of three docks containing 230 moorage slips. It is located in part of the Boyer and East Roanoke neighborhoods. It currently has 450 members.

Our business model requires that we derive income from membership initiation fees, annual dues and moorage rents. The moorage facility is not only a critical generator of rental income in itself, but is a significant recruiting incentive for attracting new members, which generates new initiation fees. Similarly, our clubhouse generates important revenue from facility rentals. Our parking lot is important to serve both the moorages and clubhouse activities. In short, each part of our facility works with the other parts and depends on the other parts to keep the club viable as a whole. Physical impacts that disrupt the functioning of one part of our facilities may end up having a disproportionate impact on the viability of Queen City, because what may seem like a relatively minor physical impact, in fact damages the ability of the remainder of the property to function as it should.

OUR PRESENT CONCERNS

Because each of the elements of our property must work in concert with one another, even the temporary loss of any portion of our facilities caused by your project will have a materially detrimental effect on the functioning and potentially the survival of Queen City.

1. ENCROACHMENT ON QUEEN CITY FAILITIES

The State has openly stated, in advance of the comment period for the SDEIS that it has selected Option A+ as the option it will build. The elements of this option are not described or discussed in sufficient detail in the SDEIS and precise information about its elements has been difficult to ascertain. Without the information about the specifics of Option A+ we are hampered in our ability to comment on the draft SEIS, and may not be able to determine what impacts Option A+ will have on the Queen City property until it is too late to provide meaningful comments. We believe this to be a violation of both NEPA and SEPA requirements.

Option A+ adds an additional 7th lane to the Portage Bay Bridge which places the new roadway outside of your current right of way and encroaches on our Dock 3 and possibly our parking lot. This is in contradiction of assurances given by WSDOT during the mediation process that the Portage Bay Bridge will remain within the existing right-of-way. While Queen City can accept proportionate expansion of the physical roadway beyond its current physical footprint, the bridge must remain within the WSDOT current right of way. Expansion beyond

C-023-057

This set of comments is a duplicate of the comments submitted separately by Richard Andrews (Comment Letter I-232). Please refer to Comments I-232-001 through I-232-009 for responses.

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This letter is a duplicate of the comments submitted separately by the Queen City Yacht Club (Comment Letter C-016). Please refer to that letter for responses.

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that footprint will encroach on our vital moorage property and thus result in a loss of critical scale in our moorage.

During the Mediation process and in several discussions WSDOT agreed to expand the Portage Bay Viaduct proportionately out from the center line of the current right of way in each direction. The SDEIS document is silent on this agreement. The SEIS must either acknowledge that WSDOT continues to honor that commitment, or disclose the extent to which WSDOT now intends to violate it. On Page 3-14 of the SDEIS describes the construction process for the Portage Bay Bridge describes the building a new bridge just north of the existing bridge then tearing down the existing bridge to build the remaining new portion south of the first portion. This construction method appears to be contrary to our agreements. We are further confused by the description on page 42 of the Construction Techniques and Activities Discipline Report which describes a completely different approach to the Portage Bay Bridge construction process. We request that WSDOT provide specifics on how the construction process can keep the new bridge centerline on the existing center line and how it fits within the existing right-of-way. We request that this description be included in the final EIS and that WSDOT make a firm public commitment to this issue.

2. LOSS OF MOORAGE:

The Project Effects and Mitigation, During Construction, Land Use and Economic Activity Section states that the "boat slips on the South Side of Queen City would be removed during construction" (Page SDEIS Executive Summary).Your report does not make clear how many boat slips will be lost and for how long. It is critical that this information be provided at your earliest convenience to allow Queen City to identify future impacts to the functioning of the entire facility and to assist you in meeting our mitigation needs.

The mitigation "Effects during Construction" Section (Page 42 of the Executive Summary) of the SDEIS acknowledges this temporary loss of boat slips at Queen City and states that this loss would be mitigated through relocation or other options to be identified. In order for Queen City to survive, it is critical that specific information be provided at your earliest convenience to allow Queen City to identify just how much boat moorage will be lost, over what period, and what specific mitigation will be provided. "Other options to be identified" are of course part of what the EIS process is expected to accomplish. But to be adequate, the EIS must in fact identify the mitigation that will be provided. Identification of those "other options" cannot be put off until some later time.

As stated above, the loss of moorage has implications beyond the direct and immediate loss of moorage revenue and the displacement of existing members who currently utilize the slips to be taken. It can have a ripple effect impacting our ability to attract and retain membership and the viability of out facility as a

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whole. The impacts felt from this will last beyond the completion of the project and impact our viability for years to come.

3. QUEEN CITY ACCESS - BOYER AND EAST ROANOKE AND VICINITY

Road closures and detours are described in a general manner in your report. Your report states the conclusion that these are "not expected to have a substantial affect on SR 520 operations". (Executive Summary Page 39) This comment causes us concern. The purpose of the EIS process is to identify and deal with impacts not just to your highway, but also to the community surrounding it. Your conclusion that 520 operations will not be substantially affected by road closures and detours ignores the impacts of the project on the neighborhoods. For the SEIS to be adequate it must disclose not only the impacts of the construction on the operation of SR 520, but also the impact on the operation of local streets that are affected by the construction and the ultimate reconfiguration of access to SR 520.

Your document does acknowledge that local street operations will be affected but provides only general statements on those affects. Access to our facilities is critical for our continued public and member operations. Your report does not provide sufficient detail to permit an intelligent analysis of these effects. For the SEIS to be adequate, it must provide that information, and must describe the mitigation that will be provided to insure that our property remains accessible to our members throughout the construction process and after completion of the project. To the extent that there will be periods when our facility is not accessible, or access is restricted, we need to know when those periods will be, and what mitigation will be provided as soon as possible so that we can make plans to protect our viability

4. TRANSPORTATION:

Queen City members and the public rely on reliable transit and the current lack of congestion to access our facilities. It appears that Boyer Ave. E. is a potential haul route, which may substantially change the accessibility of our facility during the construction period. The SDEIS notes that construction staging and schedules have not been determined and that WSDOT will continue to coordinate with local and regional transit authorities to determine haul routes and traffic detours. (See exhibit 6.1-3, page 6-6). To insure the continued viability of Queen City we request that WSDOT include us in those discussions and that the final decisions become a part of the construction bid documents issued by WSDOT to bidders.

It is possible that during construction Queen City members will need to rely on remote parking and reliable transit to access our facilities. The SDEIS notes that construction staging and schedules have not been determined and that WSDOT will continue to coordinate with local and regional transit authorities to determine

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haul routes and traffic detours. (See exhibit 61.3 – page 6-6). To insure the continued access to Queen City during construction we request that WSDOT include our participation in those discussions and that the final decisions become a part of the construction bid documents issued by WSDOT to bidders.

5. NOISE:

During construction: mitigation is required for residential areas if exterior noise levels are greater than 67dBA based on federal Noise Abatement Criteria. Pile driving and demolition of the Portage Bay Bridge will exceed 90 dBA within 200 feet of our club. (See exhibit 67.3 - page 6-70) Pounding will occur between 7AM and 7PM except Sundays and holidays from between 3 and 6 months. After Construction: The City of Seattle maximum sound level between 7:00am and 10:00pm is 55 dBA.

The SDEIS states that these levels will be exceeded and that noise measures must be considered. However, the SDEIS is vague on specific requirements or mitigation measures to be taken either during or after construction. We request that the those options found in the "Noise Reduction Strategies Expert Review Panel Report Sept. 2008" become a part of the final EIS and included in the construction bid documents issued by WSDOT to bidders of this project.

6. VIBRATION:

All of the options call for the construction of temporary bridges using vibratory hammers pile driving equipment. The discussion of the affects of these operations and the mitigation procedures associated with them are incomplete. With all the pile driving and cofferdam dewatering so near to Queen City docks there is likely to be movement and settlement of our pile support structures

Insofar as we are aware, WSDOT has done nothing to ascertain whether the Queen City docks and pilings could be damaged or collapse as a result of the impact.

We request that procedures for mitigating the affects of vibration be addressed in the final EIS and become a part of the construction bid documents issued by WSDOT to bidders of this project.

7. PORTAGE BAY

The SDESI is deficient in its analysis of the impact of your project on the historic and recreational use of Portage Bay, Union Bay and the Lake Washington Ship Canal by the boating public. It fails to recognize their role in maritime history and their status as premier recreational resources for swimming, boating, University crew training, sailing lessons, private canoes and kayaks as well as power boats, bird watching, nature walks, and access to the several marinas. The proposed

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expansion of 520 will take property from Portage Bay, and will also degrade the public's ability to enjoy the remaining property, because of the added height and doubling of bulk, threatening shadows, and noise. We request that WSDOT include analysis of the impacts of the project and mitigate the impact of construction to insure the continued use of these recreational resources.

8. OPENING DAY OF BOATING SEASON

We ask that the EIS pay particular attention to eliminate interference with Opening Day of Boating Season activities in Portage Bay, Union Bay and the Montlake Cut. Queen City welcomes the opportunity to work with WSDOT to mitigate conflicts with this International event. In addition, boating activities by Queen City members and public participants occur during the entire year and should also be considered and the impacts on boating activities be mitigated to the extent possible.

9. ENVIRONMENT

As noted on page 58 of the SR 520 SDEIS Executive Summary there will be increased shading caused by temporary work bridges in Portage Bay during construction and the wider permanent bridge structure creating a loss of salmon habitat. The report refers to Best Management Practices to control the "during construction shading" but needs to be more specific on control measures to prevent an increase in areas providing refuge for predators and non native animals.

The SDEIS omits an analysis of containment of dust and debris falling and blowing into the lake, on our boats, our docks, and our property?

The SDEIS does not discuss the issue of limiting the inadvertent transplanting or transporting of non-native invasives (milfoil or eulodia) within the Bay. Queen City in a joint program with Seattle Yacht Club has worked diligently and at our own expense to eradicate invasives and improve the aquatic habitat. We are concerned that your construction project will lead to a suspension of this program leading to a re-emergence of the invasives.

The SDEIS does not discuss Bay depths, silting and disturbance likely to be caused during construction operations which may cause the displacement of bottom mud and possibly contaminated substances which in turn could lead to new shoaling of portions of the Bay thus, limiting its recreational value and its role in marine navigation. The Final SEIS needs to discuss this and needs to disclose the mitigation that will be provided to prevent displacement of bottom mud.

The SDEIS is not specific in its discussion of alternate means of construction such as the use of derrick barges to reduce or eliminate reliance on temporary

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work bridges. An analysis of their use must be included in the final EIS and included construction bid documents issued by WSDOT to bidders of this project.

10. 1966 DEPT. OF TRANSPORTATION ACT AS AMENDED IN 2005

The project takes land from numerous publicly owned parks and recreation areas. Section 4f of the 1966 Dept. of Transportation Act as amended in 2005 requires all transportation projects requiring the use of publicly owned parks, or recreation areas or wildlife areas, can be approved only if there is no feasible and prudent alternative to using that land and if the project is planned to minimize harm to the property. The SDEIS has acknowledged that Montlake Playfield Park as having 4f status but has failed to acknowledged 4f status and review of the substantial taking of other parklands, interfering with their use for wildlife and recreational purposes both on water and on land. The SDEIS also fails to prove that all reasonable alternatives have been evaluated. The SDEIS also fails to recognize additional protection provided under Section 6f for certain areas where federal funds have been used to create an amenity (such as the Arboretum Waterfront Trail) regardless of the land on which it resides.

11. ADEQUATE ANALYSIS OF OPTION A+

As noted elsewhere, WSDOT is on record as having already selected a 520 design known as "A+", even in advance of this SDEIS. The SDEIS's reference to this option is inadequate. We believe this to be contrary to the purpose of an EIS. The public has the right to know and understand the design and its implications. We believe that the law requires that WSDOT study the actual design to identify its impacts and to identify mitigation. This has not been done and we believe that this makes the report fatally flawed.

In summary, QCYC recognizes that the SR 520 bridge replacement is necessary. It will also have potentially profound impacts on the Montlake area and Portage Bay both during construction and after it is completed. Without careful planning, it threatens the continued viability of QCYC. NEPA and SEPA require that before beginning a project with significant adverse environmental impacts, the agency in charge disclose those impacts and describe the mitigation to be proposed. We recognize the challenge that presents for WSDOT, but the fact that the project has so many significant adverse environmental impacts is not a reason why the environmental disclosure can be less than what NEPA and SEPA require; to the contrary it is a reason why the disclosures must be all that NEPA and SEPA require. We appreciate the opportunity to review and comment on the SDEIS and have a continuing Interest in working with WSDOT to resolve the issues.

C-023-058 Sincerely,

Ed Jennerich
Commodore, Queen City Yacht Club

ENCLOSURES:

Queen City Yacht Club October 25, 2006 SR 520 DEIS Response Letter

C-023-059 **Reviewer:** Robert E. Hayden, Ph.D.

Section: Social Elements Discipline Report

Parenthesis ( ): These are my comments for particular points.
X/: These are comments that I make periodically throughout this report.

Page/Comment

2/Mentions Montlake and U. District neighborhoods being impacted. (What effect does construction have on the U. District? Doesn't mention Roanoke. Confusing the U. District with the UW).

C-023-060 **3/**Mentions lids in Montlake. (What lids?)

C-023-061 **4/**Says that project will not create physical impediments to make it more difficult for residents to access community services. (What about having to cross more lanes of traffic and a further distance to access buses using 520? Also second Montlake Bridge will impede traffic even more especially since no more capacity will exist on either Pacific Street or Montlake Blvd. North Pacific Street).

C-023-062 **4/**Says that project will improve travel time for fire, medical, police, and other public services through the corridor. (How?)

C-023-063 **8/**Mentions interchange options in Montlake and UW area. Says nothing about the U. District.

C-023-064 **9 Diagram A**/Shows Westbound to Northbound Transit only ramp with no lid. (How do carpools exit 520?)

C-023-065 **16/**Under Phased Implementation, lids will be deferred. Says will develop and implement all mitigation to satisfy regulatory requirements. (Not what will be needed.)

C-023-066 **19/**Study area only within 1/2 mile of 520, except bulge north at UW (15th Ave).

C-023-067 **23/**Label Laurelhurst as on West Side of Union Bay. (Wrong side).

C-023-068 **30-32/**Community cohesion is not discussed, just describes the area.

C-023-069 **32/**Population characteristics only address immediate vicinity: Only used Montlake and McGilvra Schools as comparisons, and (omitted Seward School).

C-023-070 **34/**Parks are incomplete and contain incorrect information: Lists Ship Canal Waterfront Trail as a paved pathway (when in fact only a portion is paved and only accessible by stairs or along gravel path). (Omitted West Montlake Park completely).

C-023-071 **35/**Says that recreation areas allow residents to connect socially, (but doesn't address Montlake Blvd. disconnect).

C-023-072 **36/**Says that 5 schools are in the study area, (but excludes McGilvra School, which they used earlier as a demographic characteristic comparison).

C-023-059

As shown in Exhibit 1 of the Social Elements Discipline Report, construction of the new bascule bridge and construction activities on Montlake Boulevard and Pacific Street would have an effect on the University District. The effects were described in detail in the Social Elements Discipline Report. The Roanoke neighborhood was also in Exhibit 1 and was discussed in detail in the discipline report.

C-023-060

A description of the Montlake lid is included in Chapter 2 of the SDEIS and the Final EIS.

C-023-061

Please see the response to Comment C-023-005 regarding the larger, enhanced Montlake lid and the pedestrian connections that are part of the Preferred Alternative in this area and the response to Comment C-023-013 regarding improvements in traffic operations in the Montlake area with the Preferred Alternative.

Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) describes the effects of the Preferred Alternative on transit service and facilities, including rider connections and walk distances, in the Montlake interchange area.

C-023-062

The 6-Lane Alternative and options would result in improved response and travel times for public service providers along the SR 520 corridor. These benefits would result from new high-occupancy-vehicle lanes and full shoulders, which would enable public service vehicles to bypass traffic and reach incidents faster.

C-023-073 **40/**Speaks about transit, (but not about connections, nor mentions the Montlake Bridge and the problems associated with it being raised).

C-023-074 **X/**Did not mention anything about the yacht clubs: SYC or QCYC, boats, and the houseboats in Portage Bay. Also did not say anything about the Hamlin and Shelby neighborhoods being cut off from the rest of Montlake, but did say the Hunts Pt. is cut off from the rest of Medina.

C-023-075 **47-48 Exhibit 14/ (**Potential detour routes are highly questionable.)

C-023-076 **50 Exhibit 16/**Haul Routes will be along Montlake Blvd, Pacific, 15th, and 45th, (problem is that these roads are in gridlock 6 hours per day. Should force trucks to use 520, since WSDOT is not doing anything to improve the traffic in the Montlake area during or after construction).

C-023-077 **51/**Say that no effect on relocation of any community services or changes in service area (but omits any impact on the yacht clubs.

C-023-078 **52/**Says that detour routes may result in traffic congestion. (This is an understatement).
X/Lake Washington Blvd. ramp closures during construction will make Montlake Blvd. nonworking. A standstill.
56/North Capitol Hill Detour route will not work due to the steep grades on residential streets (They should build a temporary bridge over 520 first. Bikes will not be able to go up 11th, and pedestrians and disabled persons will find the route difficult as well.)

C-023-079 **57/**Say that Portage Bay construction efforts will be the same for all plans. (But should be less for K and L because of smaller footprint through Montlake.) Noise levels will be high within 1000 feet of pile driving, up to 80 dBA which is the equivalent of a garbage disposal.

C-023-080 **59/**No construction related effects are anticipated for schools, social institutions or government facilities in Portage Bay/Roanoke (excluded QCYC).
60/Construction activity in Montlake will last from 45-78 months.

C-023-081 **61/(**They need a way to mitigate the pile driving on the Portage Bay viaduct before the noises are made. Closure of the west bound Lake WA Blvd. ramp will pile cars onto Montlake for up to 2 yrs, but say that they will put something in place that will help minimize the delays, (however in the Transportation Discipline Report it just states that it will not effect traffic on 520, and it will maintain the Montlake Westbound ramp exit at a grade E throughout the construction process (Grade F is gridlock).
62/Option A Montlake Blvd. 45 months of noise, dust and traffic congestion including new bridge and up to 90 trucks per day.
64/Bill Dawson trail closed for up to 3 years, and Arboretum Waterfront Trail closed 30-54 months.

C-023-082 **65/**Community services in Montlake will be effected. Says that school kids from North Montlake will find that it is harder to get to school. Says that Montlake's Seattle Public Library will not be impacted by additional traffic congestion associated with the closure of the LWBlvd ramps. (What they mean is that the increased traffic will not be noticeable since the area is already at a standstill). (Also they do not say anything about the effects on the SYC).

C-023-083 **68/**Longer travel time for students who use 520 and Montlake Blvd. to get to and leave school. Says that there will be no additional travel time for option A. (How so, since they will not be adding capacity to roadways North or West of the Pacific St.

C-023-063

Page 8 of the Social Elements Discipline Report contains a description of the elements of the 6-Lane Alternative design options that were evaluated in the SDEIS. SR 520 includes an interchange at Montlake Boulevard, which is in the University of Washington area. There is no SR 520 interchange in the University District.

C-023-064

The Preferred Alternative includes an HOV direct access ramp for transit and 3+ HOV to and from the east that connect to the Montlake interchange area. This ramp would connect to the inside HOV lanes on SR 520 and could be used by both eastbound and westbound buses and 3+ carpools traveling between the Montlake interchange and the Eastside.

C-023-065

Please see the response to Comment C-023-051 regarding the deferral of lids.

C-023-066

The requested change was not made because the original statement is accurate.

C-023-067

The Social Elements Discipline Report has been updated on the errata sheet to reflect this. The errata sheet is contained in Attachment 1 to the Discipline Report Addendum, in Attachment 7 to the Final EIS.

C-023-068

Community cohesion was defined on page 30 and was discussed throughout the Social Elements Discipline Report (Attachment 7 to the SDEIS). Project effects on community cohesion were described under

C-023-083 interchange, yet they will be dumping two more lanes of traffic from the South to this point).

C-023-084 **74/**Says that transporting pontoons to Lake WA will have no effect on social elements because no social elements are located in water bodies (excluding the SYC, QCYC, houseboats, Aqua Verde Kayak Rentals, and all other boats in Portage Bay). Says that it will temporarily effect recreational users in the Montlake Cut. (What about the impact of raising the Montlake Bridge for each pontoon to pass under?)

C-023-085 **X/**Study does not address the issue of the raising and lowering of the Montlake Bridge, and what impact a second bridge will have on the neighborhoods and all the social elements connected to this element.

C-023-086 **78-80/**On Community Cohesion the study says that the footprint of 520 will be as narrow and low as possible. The project will not negatively effect community life, persons, groups, or impede access for those who live and work in the area. Says that project would result in no noticeable change in air quality, and says that lids will bring communities back together and art will be incorporated into the design of the lids.

C-023-087 **80/**Noise modeling indicates that the project would result in beneficial effects on noise levels (What the…?) (And doesn't include the yacht clubs as effected elements.)

82 Exhibit 23/Number of residences where noise levels exceed the NAC=Noise Abatement Criteria in Montlake north of 520: Existing 37, No Build 47 (Do not say why this number would increase. Why would this increase if nothing were built?), 6 Lane Alternative 28 (Do not say why this would decrease).

C-023-088 **83/**Says project would improve travel time for transit, carpools, and vanpools (not SOV's Single Occupancy Vehicles).

84/Says that switch to more HOV's would reduce congestion for fire, emergency vehicles, and police (but still could have as many or more SOV's because of higher capacity to exit onto Montlake). Says that project does not result in any negative changes to pedestrians, bicycles, and transit facilities.

C-023-089 **87/**No effects associated with any community service or transit facilities in Portage Bay/Roanoke (omit QCYC).

C-023-090 **88/**Will remove one house in Montlake. (Which one?)

C-023-091 **89/**Says that taking 2 houses for Montlake Bridge will not effect community cohesion (but doesn't mention wider Montlake Blvd and loss of yards and sidewalks and buffer to road). Says that taking gas station will effect community. Says that no negative effects will occur along Montlake Blvd. (What the …?)

C-023-092 **90/**Says that operating the new project will not result in effects on schools, religious institutions, social institutions, or government facilities in the Montlake neighborhood (but omits some of the main social institutions from consideration).

C-023-093 **91/**Says that the project results in improvements in connections between transit improvements and improves transit travel times (but mentions nothing about the raising of the Montlake Bridge). Says that the new bascule bridge will benefit buses by reducing congestion and delay (except when bridges go up).

C-023-094 **92/**Improvements in transit would improve travel time to UW (but says nothing about travel to the University Village or Seattle Children's Hospital, because it does nothing along this corridor).

the heading, "Potential Effects of the Project," beginning on page 45 of the discipline report.

C-023-069

As stated on page 32 in the Social Elements Discipline Report , WSDOT used data from two Seattle public elementary schools because of the availability of limited English proficiency data and because the attendance boundaries closely resemble the study area. The Seward School (now called TOPS School) was not included because of its designation as a magnet school. It, therefore, would not necessarily reflect the characteristics of populations in the study area.

C-023-070

Recreational resources inside the project area were defined as those within 500 feet of the proposed highway footprint or any proposed construction activities. A 500-foot radius was deemed an adequate distance to assess recreational resources that could be affected by acquisition and construction activities or to assess effects related to proximity to the project that could impair the use and function of the resource. West Montlake Park is located outside the project study area and, therefore, was not included in this analysis.

C-023-071

Please see the response to Comment C-023-005 regarding a larger Montlake lid and enhanced pedestrian amenities in the Preferred Alternative and the response to Comment C-023-011 regarding design of the lid and related pedestrian connections.

C-023-072

Please see the response to Comment C-023-069. McGilvra School is located outside the project study area and therefore was not included in this analysis. It was used as an example in the Social Elements

C-023-095 **X/**No change in transit connectivity to Northeast Seattle, nor a decrease in car travel time along Montlake Blvd. from NE Seattle. How will employees travel to and from NE Seattle along a corridor that has no transit and cars stand in traffic?

C-023-096 **100/**Will use measures to minimize disruptions to access to businesses and properties. Says that they could use barges for construction mitigation.

C-023-097 **103/**Says that they can make transit stops accessible for people with disabilities. (Why have they not done that before?)

C-023-098 **X/**Throughout the report they say that soundwalls are only in option L and can potentially be used under A, but not under K. This is a biased assumption. Not initially included in K because wanted to use quiet pavement instead, but ruling by WSDOT is that quiet pavement is not a proven abatement method because it wears away. So why can't noise walls also be incorporated into K?

C-023-099 **Summary:** The scope of the study area does not take into consideration enough of the area that the new highway will impact. The main issue in Seattle is the movement of cars and people along the 520 corridor, from North and South to and across the corridor, and all those who live, work, and play near 520. Anyone who uses public transit to move through this corridor will find the A+ plan as not making any significant changes from the no build option. Movement to and from the NE section of Seattle will not be enhanced. The University Village and Seattle Children's Hospital will still not be adequately connected to the Montlake interchange. Major social institutions in the immediate area of the project have been omitted from the report: The Seattle Yacht Club and the Queen City Yacht Club are not even mentioned, even though they are the two social institutions most effected by the new and old 520 corridor. The raising and lowering of the Montlake Bridge is not addressed in this study and how it effects the Montlake neighborhood in its current configuration nor in Option A plans for a new Montlake interchange. Without this being taken into consideration the plans are completely insufficient, because 18 hours of our life in this corridor are not being addressed. The assumptions that gridlock in Montlake will continue under Option A as it is with the No Build scenerio should not be acceptable as an outcome for this project, and to say that this will not effect any of the social elements in Montlake is also unacceptable. WSDOT's social elements study is really showing that WSDOT never properly mitigated any of the effects from the original building of 520, and so the new project will have little effect on changing any of the current issues. And because it will change few of the existing conditions, it will thus have little or no effect on social elements in the area.

Discipline Report as a demographic characteristic comparison because it serves a community in the study area.

C-023-073

Please see the response to Comment C-023-005 regarding a larger Montlake lid and enhanced pedestrian amenities in the Preferred Alternative, the response to Comment C-023-011 regarding design of the lid and related pedestrian connections, the response to Comment C-023-013 regarding improved transit reliability with the project, and the response to Comment C-023-019 regarding improvements in traffic operations with the Preferred Alternative, including the new bascule bridge. Local traffic operations associated with Montlake Bridge openings are described in the Transportation Discipline Report and the Final Transportation Discipline Report (Attachment 7 to the Final EIS).

C-023-074

Section 4.3 of the SDEIS included the Queen City Yacht Club and houseboats on Portage Bay in the description of the Portage Bay/Roanoke neighborhood. The Seattle Yacht Club was included in the description of the Montlake neighborhood, along with the explanation that in 1960, the construction of SR 520 separated the neighborhood into two areas (pages 4-18 and 4-19).

C-023-075

Potential detour routes during construction have been revised for the Preferred Alternative. Please see Section 6.1 of the Final EIS and Chapter 10 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS).

C-023-076

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.

The EIS analysis considers local street routes as possible haul routes for the purposes of estimating and disclosing effects that could occur. However, 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.

Northeast Pacific Street and 15th Avenue Northeast are not is identified as potential haul routes for Option A or the Preferred Alternative in the Final EIS. Section 6.1 of the Final EIS and the Final Transportation Discipline Report (Attachment 7 to the Final EIS) include an updated map of the potential haul routes and the construction duration, and estimated truckloads per day are included in Section 6.1 of the Final EIS.

C-023-077

For the Draft EIS and SDEIS, WSDOT reviewed neighborhood characteristics and identified community services within the study area. Community services include schools, religious institutions, social institutions, government facilities, fire and emergency medical, police, and utilities. These do not typically include private facilities, such as yacht clubs. Project effects on the Seattle Yacht Club and the Queen City Yacht Club are described in Sections 5.4 and 6.4 and the

Recreation Discipline Report Addendum, and effects on the Queen City Yacht Club are described in Sections 5.1 and 6.1 of the SDEIS and Final EIS and in the Land Use, Economics, and Relocation Discipline Report and Addendum. Other effects on the Seattle Yacht Club, which is a contributing element to the Montlake Historic District and is individually listed in the National Register of Historic Places, are described in Sections 5.6 and 6.6 of the SDEIS and Final EIS the Cultural Resources Discipline Report and the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS).

C-023-078

Current construction sequencing calls for improvements to the Montlake interchange to be completed before closure of the Lake Washington Boulevard ramps. The Delmar Drive road closure described in the SDEIS is no longer planned. Delmar Drive will be shifted onto a portion of the new lid while the existing bridge is removed and reconstructed. Section 6.1 of the Final EIS and Chapter 10 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) describe the effects of construction on transportation that have been updated for the Preferred Alternative.

C-023-079

The statement in the Social Elements Discipline Report is about effects in the Portage Bay area. The discussion about effects in the Montlake area began on page 60 of the report and indicated that the design options would have different effects in this area. Please see the response to Comment C-023-006 regarding Option K. Option L would also have more severe effects on natural resources than Option A.

The Noise Discipline Report Addendum (in Attachment 7 to the Final EIS) presents updated and additional information on construction noise. WSDOT will comply with local noise regulations, although some

variances could be necessary to minimize the overall duration of construction.

C-023-080
Please see the responses to Comments C-023-018 and C-023-077 regarding effects on the Queen City Yacht Club.

C-023-081
Please see the response to Comment C-023-078 regarding the timing of the closure of the Lake Washington Boulevard ramps. Section 6.1 of the Final EIS and Chapter 10 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) contain updated descriptions of effects from the construction of the Preferred Alternative on transportation.

C-023-082
Please see the responses to Comments C-023-018 and C-023-077 regarding effects on the Seattle Yacht Club.

C-023-083
The discussion on page 68 of the SDEIS related to construction effects, whereas the comment seems to be about operational effects. The construction effects from Option A on community services would have been the same as those described generally for the 6-Lane Alternative.

C-023-084
See the response to Comment C-023-077 regarding the community services analyzed in the Social Elements Discipline Report. Bridge opening would not likely be required when pontoons are transported through the Montlake Cut.

C-023-085

Pages 62 and 64 of the SDEIS describe construction effects of the new bascule bridge on community services, and pages 76 and 91 through 92 describe its operational effects on community services. Please see the response to Comment C-023-013 regarding improvements to traffic and transit operations with the Preferred Alternative, which includes a new bascule bridge. These improvements would benefit community services.

C-023-086

Comment noted.

C-023-087

Please see the responses to Comments C-023-018 and C-023-077 regarding effects on the Seattle Yacht Club and the Queen City Yacht Club. See the responses to Comments C-023-002, C-023-005, and C-023-015 regarding noise reductions that would occur with the Preferred Alternative.

By 2030, if the project were not built, traffic noise would increase on SR 520 due to increased traffic volumes that result from population and employment growth. With the 6-Lane Alternative design options, a larger proportion of trips would occur in HOVs, thereby reducing total vehicle demand, which would contribute to reduced noise. With the Preferred Alternative, noise would be further reduced compared to Option A by the noise reduction measures included in the design features, as described in the responses to Comments C-023-005 and C-023-015.

C-023-088

The Preferred Alternative would improve travel times for all vehicles using the SR 520 corridor. The Social Elements Discipline Report presented this effect on HOVs because of the benefit to community services. Please see Section 6.1 of the Final EIS and Chapter 5 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for

discussions of freeway travel times with the Preferred Alternative. Section 6.1 of the Final EIS also describes effects on general purpose traffic in the Montlake area, as does Chapter 6 of the Final Transportation Discipline Report. The project would improve conditions for pedestrians, bicycles, and transit. Please see the responses to Comments C-023-005 and C-023-013.

C-023-089

Please see the responses to Comments C-023-018 and C-023-077 regarding effects on the Queen City Yacht Club.

C-023-090

Pages 87 and 88 of the Social Elements Discipline Report contained errors regarding property acquisitions. The paragraph discussing the residential property acquisition required under all options should have been located in the Portage Bay section, not the Montlake section. Of the SDEIS options, only Option A would require acquisition of residences in Montlake. The residences are identified in Exhibit 5.2-5 of the SDEIS. The information has been corrected in the errata sheet included as Attachment 1 to the Social Elements Discipline Report (in Attachment 7 to the Final EIS).

Please see Section 5.2 of the Final EIS and the Land Use, Economics, and Relocations Discipline Report Addendum (Attachment 7 to the Final EIS) for information on property acquisitions with the Preferred Alternative.

C-023-091

The project footprint will remain within existing WSDOT right-of-way wherever possible. The limits of construction for the Preferred Alternative changed such that the construction easements would be less than those of Option A in this area. The Preferred Alternative would not remove the

Montlake 76 service station or any buildings on the National Oceanic and Atmospheric Administration Northwest Fisheries Science Center property. However, the acquisition of two houses in the Montlake area would still be required with the Preferred Alternative to accommodate the new bascule bridge on Montlake Boulevard East across the Montlake Cut.

As discussed in the Social Elements Discipline Report, community cohesion is defined as "The ability of people to communicate and interact with each other in ways that lead to a sense of community, as reflected in the neighborhood's ability to function and be recognized as a singular unit." Although the acquisition of the residences would be an effect of construction of the project, there would be no negative effect on community cohesion because the acquisition would not interfere with the neighborhood's ability to function and be recognized as a singular unit.

Additional information about property acquisitions is in the Land Use, Economics, and Relocation Discipline Report Addendum (Attachment 7 to the Final EIS).

C-023-092

As stated in the Social Elements Discipline Report, the study area for social elements is defined as the portions of the neighborhoods adjacent to the SR 520 corridor from I-5 across Lake Washington to the Evergreen Point Road in Medina, within 0.5 mile of the proposed project's construction limits. Community services include schools, religious institutions, social institutions, government facilities, fire and emergency medical, police, and utilities. Also, please see the response to comment C-023-077.

C-023-093

Please see the response to Comment C-023-013 regarding improvements to transit operations with the new bascule bridge and the

response to Comment C-023-005 regarding new and enhanced pedestrian connections that can be used to access transit. See Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for a more detailed discussion of Montlake area transit connections and transit travel times with the Preferred Alternative, including a discussion about the effect of Montlake Bridge openings on transit travel times.

C-023-094

Please see the response to Comment C-023-092 regarding the study area for community services, the response to Comment C-023-077 regarding how community services are defined, and the response to Comment C-023-093 regarding transit travel time in the Montlake corridor.

C-023-095

With the project, workers traveling to and from northeast Seattle could use the same travel modes they do today, but with improved travel times and reliability in the Montlake area and on the SR 520 corridor. By 2030, some northeast Seattle residents will also have the option to take light rail to downtown Seattle and to the Eastside.

C-023-096

Both barges and trucks are expected to be used for transporting materials and demolished structures to and from the project area. In areas where there is no water access or where water access does not have sufficient size or depth, barges cannot be used. The potential haul routes and the estimated number of haul trips shown in the SDEIS have been revised since the SDEIS was published. The revised potential haul routes and haul trips analyzed in the Final EIS are anticipated to minimize disruption to adjacent communities from construction activities. See Section 3.1 of the Final EIS for more information. Also see the

response to Comment C-023-076 for general information regarding haul routes.

C-023-097

Many transit stops are accessible to people with disabilities. The information the comment refers to relates to temporary transit stops that could be necessary during construction. If temporary stops are needed, all reasonable steps will taken to make them accessible to people with disabilities.

C-023-098

Noise walls were analyzed for Option L, but could be included, where they meet specific criteria, in the other design options. Noise walls would be based community preference. However, with the noise reduction features in the design of the Preferred Alternative, noise walls would not be recommended in the Seattle portion of the project, except potentially along I-5 in the North Capitol Hill area where the reasonableness and feasibility of a noise wall is still be evaluated. Please see the responses to Comments C-023-002, C-023-005, C-023-010, and C-023-015 regarding noise.

C-023-099

Analyses presented in the SDEIS and definition of study areas used accepted methodology based on WSDOT and FHWA guidance, as well as other guidance when applicable. Please see the responses to specific comments above.