From: Joe Willis [mailto:jwillis@medina-wa.gov]
Sent: Thursday, April 15, 2010 2:03 PM
To: SR 520 Bridge SDEIS
Cc: Donna Hanson; Robert Grumbach; Bret Jordan; Doug Dicharry; Janie Lee; Mark Nelson; Shawn Whitney; Patrick Boyd; dspkep@msn.com
Subject: SR 520 Supplemental Draft EIS comments

Attached are City of Medina comments on the SR 520, I-5 to Medina, Bridge Replacement and HOV Project Supplemental Draft EIS document.
Thank you for the opportunity to comment.

CITY OF MEDINA
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April 14, 2010

Jenifer Young
Environmental Manager
SR 520 Project Office
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RE: City of Medina Comments on SR 520, I-5 to Medina Supplemental Draft EIS

Dear Ms. Young,

L-003-001 Thank you for the opportunity to comment on the Supplemental Draft EIS for the SR 520 Bridge Replacement and HOV Program. The City of Medina has the following comments:

According to the Supplemental EIS document (Chapter 1 page 1-35) and recent discussions with WSDOT and design team consultants the SR 520 project is divided into two separate projects (Medina to SR 202 Eastside Transit and HOV Project and I-5 to Medina Bridge Replacement and HOV Project), interface between the two projects occurs at Evergreen Point Road in Medina. This unfortunate circumstance subjects the City, contractors, utility managers, transit, and other agencies to scheduling and coordination headaches that are not presently defined or well

L-003-001

WSDOT has continued to coordinate with the City of Medina to facilitate clarity between the SR 520, I-5 to Medina: Bridge Replacement and HOV Project and the SR 520, Medina to SR 202: Eastside Transit and HOV Project as the two projects relate to City staff and contractors.

The Evergreen Point Road lid would be constructed as part of the Medina to SR 202 project. For construction sequencing and anticipated timing of that project, please see pages 4-21 through 4-22 of the SR 520, Medina to SR 202: Eastside Transit and HOV Project Environmental Assessment, which can be accessed at http://www.wsdot.wa.gov/Projects/SR520Bridge/EastsideEA.htm. Construction of the Medina to SR 202 project would overlap with, and would be coordinated with, the east approach portion of the I-5 to Medina project.

Please see page 6-11 of the SR 520, I-5 to Medina: Bridge Replacement and HOV Project SDEIS, which outlined the closure of the Evergreen Point Freeway Station and stated that the 92nd Avenue NE stop may have to accommodate the additional ridership. The conclusion presented in the SDEIS indicated that transit riders may experience increased travel times. Please see the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for a discussion of project effects on transit, including the anticipated closure of the Evergreen Point Freeway Station.

L-003-001 conceived in the document. For example, closing the Evergreen Point Road Park & Ride lot and the transit stop for 4 to 6 months (Chapter 3 page 3-45) without consideration being given to the affects to local users, transit operations, and necessary bus transfers between bus routes and bus schedules is not adequately addressed, especially when two separate projects are impacting the corridor. The placement of a temporary transit stop west of the ultimate freeway lid is described in the eastside project. The completion of the transit access from the new Evergreen Point Road freeway lid to the roadway center lanes is described in the westside project. When is the Evergreen Point Road lid constructed? It is not adequately provided for in either document.

L-003-002 Construction guidance documents that are to be drafted and provided to the design-build contractors need to define the parties, who has the authority to make decisions that override the contractors, and how those decisions are to be made in a timely manner so that all affected parties have input, are aware of the issues, and have time to prepare for the implementation. Project design oversight and processes and construction management is not defined in any of the Supplemental Draft EIS documents. Each municipality affected by the east and west side projects need the authority and avenue for affecting changes to the contractor(s) proposed methods of construction and implementation as they impact local traffic, traffic control, streets, utilities, park lands, including but not limited to construction noise, dust, and disruption of services.

L-003-003 Comments on specific items:

1. Chapter 3 Bridge Maintenance Facility (page 3-44). The operation of the maintenance facility is not consistent with the residential character of the surrounding land uses. This is reflected in the Medina Shoreline Management Master Program which states its primary goal is to preserve Medina's shoreline for single-family residential use. There does not appear to be much of an analysis in the EIS about how the maintenance facility might affect this residential nature. While the EIS states the facility will be buried in the bank slope, comments from WSDOT staff have indicated this may not be the case. In any case, compatibility with residential uses will need to be demonstrated at the time a shoreline conditional use permit application is submitted. 150 to 200 temporary support piles mentioned in this chapter are not evaluated for impacts to the shoreline zone.

   Maintenance dock. The Medina SMP states piers should be the minimum length (not to exceed 100 feet) and width necessary for reasonable use, and that the overall square footage of the pier is compatible with adequate depth of water and length of piers on similar adjacent properties. The proposal for a 100-foot in length dock is consistent with the Medina SMP, but the proposed width and overall square footage will require further analysis for its reasonableness. Near shore impacts for the proposed dock and wave barrier are not evaluated or provided in the document. The discipline reports indicated construction on the maintenance facility and dock will last 24 months. The report indicates during construction, contractors would be required to use best management practices to avoid construction effects that could harm fish habitat. However, the City would request that this be expanded to take into consideration the city's construction mitigation program where construction effects on neighboring properties are addressed.

L-003-002

WSDOT continues to coordinate with the City of Medina through a series of meetings intended to inform the City as project design and delivery methods progress and provide opportunities for discussion. Project design oversight and processes and construction management will be defined as part of the construction contract(s) awarded for the SR 520, I-5 to Medina project. The project NEPA documents disclose the effects anticipated from construction and operation of the project and outline minimization and mitigation commitments regardless of the delivery method. Permit stipulations will also specify mitigation requirements for the project, ranging from specific actions to performance-based measures, depending on the intended outcome. As with all of its projects, WSDOT and its contractors will continue to work with affected municipalities to identify the proper channels of communication during construction and to comply with all permit conditions and applicable commitments.

L-003-003

Compatibility with residential uses will be demonstrated at the time a shoreline conditional use permit application is submitted. For an evaluation of effects on the shoreline zone, please see the Ecosystems Discipline Report (Attachment 7 to the SDEIS) and the Ecosystems Discipline Report Addendum (Attachment 7 to the Final EIS). The proposed width and overall square footage of the maintenance dock will be evaluated for reasonableness and consistency with the Medina Shoreline Management Master Program. Nearshore effects of the proposed dock and wave barrier were evaluated in the Ecosystems Discipline Report and updated for the Preferred Alternative in the Ecosystems Discipline Report Addendum. The Preferred Alternative does not include a wave barrier. WSDOT also will take into consideration the City's construction mitigation program.

L-003-004 Evergreen Point Road Transit Station. (See comments above). The paragraph states that the station would be relocated to the lid in the interim. How can that happen if the lid is not yet in place either by failure of the Medina to SR 202 project to be built or by a funding short fall that delays its construction?

L-003-005 2. Construction Staging Areas and Haul Routes (Chapter 3): Temporary construction offices will require building permits and utility connections (no overhead services are allowed). Staging areas should be screened from residential neighboring properties. Temporary erosion control needs to installed, monitored, and maintained throughout the construction. Any work within the City rights-of-way will require permits, City inspections, and approval. Haul routes over City streets will require permits, documentation of conditions prior to use, sweeping, patching, timely repairs of any damage, and full restoration following the project.

L-003-006 3. Project Area's Environment (Chapter 4). Fairweather Park is described on page 4-34 and includes the an "Unnamed Stream" through the park (as described in the Medina to SR 202 EastsideTransit HOV Project) as a spring-fed stream. The spring-fed stream is primarily fed by runoff from a sizable drainage area south of SR 520 that passes under the freeway in a culvert (the present SR 520 toll plaza area also drains to this same culvert). On March 1, 2010, WSDOT made a request to me that the City replace an existing 24-inch diameter high flow storm water bypass constructed by the City in 1996 within the north margin of the WSDOT right-of-way within the northerly portion of the highway right-of-way to avoid adverse impacts to the nature preserve.

The bypass pipeline was constructed to prevent erosion of the natural unnamed stream bed within the easterly Nature Preserve portion of the park. The SR 520 existing cross culvert is proposed by the WSDOT design team to be extended to accommodate the relocated Regional Bike Path and sound walls, but no mention is made in the environmental document regarding the importance of retaining a high flow bypass that reduces the peak flows to the stream through Fairweather Preserve. Extension of the cross culvert by itself (as proposed by the WSDOT design team) without the relocation of the high flow bypass pipeline will subject the Fairweather Preserve stream to uncontrolled flows that prior to 1996 resulted in significant stream bed down cutting, sediment transport, and stream bank erosion.

The bypass pipeline was installed under Franchise Agreement No. 10240 within the northerly portion of the highway right-of-way that was already cleared and occupied by the Points Loop Trail to avoid damage to the nature preserve. Relocation now will require removal of significant trees and vegetation in order to place it outside of the proposed freeway improvements that also includes a proposed highway stormwater runoff treatment facility in that portion of the preserve next to 80th Ave NE described on page 5-122 of the document. If WSDOT truly desires to minimize adverse impacts to the Fairweather Park and Preserve, then the cross culvert diversion manhole and the relocation of the high flow bypass should be included in the Eastside SR 520 construction contract work and be completed in conjunction with the highway stormwater runoff treatment facility.

L-003-007 Geologically Hazardous Areas: The City's critical areas regulations set forth in chapter 18.12 of the Medina Municipal Code is utilized to protect critical areas within the shoreline

L-003-004

The NEPA documentation for the SR 520, I-5 to Medina project assumes that the Medina to SR 202 project will be in progress or completed before the SR 520 I-5 to Medina project improvements are completed. In the event of a change in budget or delivery schedule resulting in a delay to construction of the Evergreen Point Road lid, an environmental re-evaluation may be necessary to address any contingency plans. For more information on construction of the Evergreen Point Road lid, please see the response to comment L-003-001.

L-003-005

WSDOT will comply with applicable City of Medina regulations for construction staging areas and haul routes.

L-003-006

Effects on the Eastside are discussed in the Environmental Assessment for the SR 520, Medina to SR 202: Eastside Transit and HOV Project. Please reference this document at http://www.wsdot.wa.gov/Projects/SR520Bridge/EastsideEA.htm.

L-003-007

Since the SDEIS was published, WSDOT has completed additional geotechnical investigations, the results of which are being used to evaluate and refine the design of the east approach and bridge maintenance facility. Please see the Geology and Soils Discipline Report Addendum (Attachment 7 to the Final EIS) for discussions about construction and operational effects of these facilities on surrounding steep slopes and groundwater resources. Permit applications will fully address the I-5 to Medina project elements and provide the necessary level of detail to meet regulatory requirements. WSDOT will comply with all applicable City of Medina regulations.

L-003-007 jurisdiction. The SDEIS does not provide enough information to determine what affects the construction of the maintenance facility and east approach project will have on the surrounding steep slopes. This will need to be evaluated as part of the shoreline permits.

L-003-008 East Approach & Bridge Construction. Medina's shoreline jurisdiction reaches to the mid point of Lake Washington. A substantial development permit is required for this development to occur within the shoreline jurisdiction.

L-003-009 4. Project Operation and Permanent Effects (Chapter 5). Development of Interchange Forecasts – We are concerned about using a general growth rate to prepare the interchange forecasts. Operations at the interchanges and the adjoining intersections are directly impacted by specific intersection turning movements. Assuming general growth rates and similar turning movement ratios in developing the forecasts is an overly simplistic approach for such a detailed operations analysis. The City is concerned that growth from specific travel patterns and movements were not directly accounted for in the analysis.

L-003-010 Economic Impact page 5 - 41 mentions parcel purchases in Medina. The City of Medina Comprehensive Plan (as amended in March 2005) in the Parks and Open Space Element includes goals and policies to acquire additional waterfront access and to develop view parks in the City. In concert with that vision, the City desires to create more park space and waterfront access by acquiring the excess portions of the State purchased parcels following completion of the freeway project to enlarge Fairweather Park and Preserve and link it with the Regional Trail, maintain existing connections with the Points Loop Trail, and to provide access to Lake Washington shoreline.

L-003-011 Eastside Landscape Unit (page 5-77). No mitigation is proposed or described in the document for the removal of a swath of mature trees and understory on the north side of SR 520 associated with both SR 520 projects (bridge and stormwater treatment ponds adjacent to Fairweather Park and Preserve). Contrary to the statement on page 5-82 of the document, the City considers the removal of trees as a major activity that requires mitigation (Municipal Code Chapter 12).

L-003-012 Groundwater. At present under the Medina to SR 202 project a 0.06 acre portion in the southwest corner of Fairweather Park playfield is proposed to be acquired and permanently converted to the relocated Regional Bike Path merged with the park. WSDOT recently requested an additional 0.63 acre for construction of the Evergreen Point Road lid on a temporary basis to accommodate subterranean tiebacks to support temporary shoring walls. The area requested is presently under consideration for the sitting of wireless communications facilities, has trees along the frontage of Evergreen Point Road, is an active playfield, and has tennis courts in the easterly portion of the area. The document does not address these impacts. At a minimum, WSDOT must demonstrate that the temporary shoring wall and subterranean tieback supports in the upper portion of the park will not adversely affect the hydrology and groundwater contribution to the Fairweather Preserve forest and wetland ecosystem (exclusive of the high flow stormwater bypass mentioned above).

L-003-008

WSDOT will request a substantial development permit for the east approach and floating bridge construction.

L-003-009

The travel demand model referred to in Chapter 5 of the SDEIS was validated to a screenline level, rather than an arterial level, consistent with standard practices. A screenline is an imaginary line across a section of freeway or arterials. Screenlines are often used in traffic analyses to determine how much volume is entering or existing particular area based on how much traffic crosses the screenline (see Chapter 4, including the text box on page 4-5 of the Transportation Discipline Report in Attachment 7 of the SDEIS for further explanation). Because the model was validated at a screenline level, WSDOT identified a general growth rate for each interchange area.

However, to develop the turn movement, ramp, and corridor forecasts, the general growth rate was broken into several "layers." Each ramp is an independent layer, and the local trips (trips that do not access SR 520) are another layer. For example, at the Montlake/Lake Washington Boulevard local network, there would be seven layers (six ramps, plus local) of volumes forecasted. WSDOT developed on-ramp and off-ramp forecasts (growth rates for on- and off- ramps differ from each other), then distributed this volume onto the local system based on logical traffic patterns. For instance, an off-ramp trip would not distribute directly back onto the freeway. Then, another growth rate was applied to local trips. Summing all these layers together resulted in the total volume in and out of the interchange area, which corresponds to the general growth rate identified initially. However, each turn movement and the various travel patterns would have unique growth patterns. Thus, the analysis accounted for different rates of growth for specific movements.

L-003-013

5. Effects during Construction (Chapter 6). Evergreen Point Transit Station closure (see comments in the second paragraph of this letter) will adversely affect transit ridership. Maintaining one eastside station open at all times fails to recognize the function and use of the individual transit stations. The 92nd flyer stop provides the central location for Prep School students to board buses bound for Seattle while the Evergreen Point Road transit station provides a host of diverse users and functions as a major transfer point for riders. The transit stops require greater study and attention than provided in the document.

L-003-014

Effects on Neighborhood Streets. The projected number of truck trips (Table 6.1-4) will significantly affect the speeds of traffic and result in increased congestion on the freeway and thus result in significant backups on on-ramps and surface streets feeding to them. Since vehicles will be backed up in the NB inside lane of 84th Avenue, analysis should given to the blocking and safety impacts problem of vehicles trying to ingress and egress from Medina Circle. In addition, vehicle queuing may at times extend past NE 24th Street and block NB left turns from 84th Avenue NE to NE 24th Street. These possible impacts are not disclosed or discussed in the analysis, and no mitigation considerations are provided to address the ultimate lane configurations and interchange operation. The City is concerned that solutions to these problems are not reflected in the proposed design or for the interim phases of the projects.

L-003-015

Construction affecting public services and utilities (page 6-36). Utility relocation and replacement required by the project need to consider maintenance of existing services during construction and accommodate upgrades to those services as provided for in the utility comprehensive plans. Water mains for example in Medina are undersized, were constructed of AC materials that are past their projected service life, and require replacement with larger mains to provide adequate domestic and emergency fire flow demands. The SR 520 ultimate design lids will require additional irrigation water. Landscape areas along the corridor will require irrigation water. The Evergreen Point Bridge design needs to consider emergency fire protection on the bridge; none of this is addressed in the document.

Stating that franchise agreements will be utilized to relocate utilities forces utility agencies to absorb the impacts of relocating their facilities. This attempts to shift the fiscal responsibility for the relocation work from the State to the local agencies that are already taxed in a difficult financial climate, have not anticipated the cost or manpower allocation required to accommodate the freeway construction on a short time table. This will force the agencies to pass the costs onto the local rate payers. These impacts have not been addressed in the document.

L-003-016

Construction Equipment Impacts. Medina has strict requirements on construction equipment including but not limited to weight restrictions, parking restrictions, mobilization of oversized equipment, etc. (municipal code chapter 10). These and associated construction requirements in the code will apply to all operations outside of the WSDOT right-of-ways.

L-003-017

Be assured, the City of Medina supports the completion of the SR 520 Eastside and Westside Bridge Replacement and Transit and HOV Projects for the benefit of all, provided it is designed and accomplished in a manner that considers the impacts to local residents, mitigates the

L-003-010

WSDOT is actively working with the City of Medina to provide public access along the shoreline area in the vicinity of the new bridge maintenance facility and the new east approach. As the design progresses, WSDOT will continue to work with the City of Medina to balance infrastructure maintenance requirements with the City's vision for public access to shorelines and trail and park connectivity.

L-003-011

The referenced text is in the description of visual quality effects. Any vegetation and tree clearing effects resulting from the SR 520, I-5 to Medina project adjacent to Fairweather Park would be within the existing WSDOT right-of-way. WSDOT does not anticipate effects to occur outside of the existing right-of-way. The environmental documentation for the SR 520, Medina to SR 202 project addressed anticipated effects associated with that project, and most of the effects anticipated in the City of Medina would be a result of the SR 520, Medina to SR 202 project. WSDOT will continue to work with the City of Medina on landscape design and screening for the project. WSDOT will comply with applicable regulations of the City of Medina, and WSDOT will coordinate further with the City on this issue as design development progresses and permitting is initiated for the I-5 to Medina project.

L-003-012

For discussion of effects on the Eastside, please refer to the Medina to SR 202: Eastside Transit and HOV Project Environmental Assessment, available at http://www.wsdot.wa.gov/Projects/SR520Bridge/EastsideEA.htm.

L-003-013

On pages 10-39 and 10-40, the Transportation Discipline Report, notes that the 92nd Avenue NE Freeway Transit Station could be used to

L-003-017 negative impacts to the greatest extent possible, taking into account the overall needs of the community of Medina no more and no less than larger municipal participants in the project.

Again, thank you for the opportunity to comment. If you have any questions, please contact me at (425) 233-6439 or jwillis@medina-wa.gov.

Sincerely,

Joe W. Willis Sr. P.E., P.L.S.
Director of Public Works
City of Medina

cc: City Council, Donna Hanson, Robert Grumbach

provide access to routes traveling between the University District and the Eastside during temporary closure of the Evergreen Point Freeway Station. Effects on transit during construction were refined and reported in more detail for the Preferred Alternative. Please see Chapter 10 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for more information.

WSDOT will continue to coordinate with the transit agencies, including Sound Transit, to develop a plan for managing effects on transit access and routes during construction. The WSDOT construction traffic management process, which includes ongoing multi-agency coordination throughout construction, identifies construction conditions on short- and long-term timelines and addresses them through established coordination and communication procedures.

L-003-014

During construction of the I-5 to Medina project, truck haul traffic on the Eastside could intermittently affect portions of Medina streets near the SR 520 corridor. In some cases, for example, trucks departing the construction site would access local streets for short distances to execute a turn after loading or unloading, or travel through SR 520 interchanges to turn and travel in the opposite direction on SR 520. Exhibit 10-7 in the SDEIS Transportation Discipline Report presented information on expected truck trips using SR 520 to access the east approach area during construction. Please see the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for additional and updated information about truck access and truck trip estimates in the east approach area. This new information is based on changes to project staging and further coordination with the Medina to SR 202 project.

With respect to operational (long-term, post-construction) effects, it should be noted that the street segments and intersections mentioned in this comment are not within the local transportation study area for the I-5

to Medina project. Using standard methods, WSDOT determined the local transportation study area for the Final EIS by comparing the modeled change in peak-hour traffic volumes on local streets between the No Build Alternative and the Preferred Alternative. The local study area includes only intersections where traffic volumes would increase by more than 5 percent. This percentage was selected as the criterion because a change in traffic of 5 percent could result in measurable operational changes. If traffic volume increases on adjacent streets were calculated to be less than 5 percent, the intersection is not included in the analysis. Thus, with the Preferred Alternative, all intersections not included in the local study area would experience an overall change in traffic volumes of less than 5 percent during the a.m. and p.m. peak hours.

L-003-015

WSDOT will coordinate closely with local jurisdictions and utilities throughout project design and construction. Please see Chapter 6 of the Final EIS for discussions about maintaining existing services during construction and coordination with utility providers and fire departments, which are paramount considerations.

Design details such as irrigation supplies and systems for lid landscaping will be addressed during engineering design and construction planning. WSDOT does not anticipate that SR 520, I-5 to Medina project operation would affect the existing water supply sufficiently to warrant a NEPA-level analysis. WSDOT will continue to coordinate closely with the City of Medina and affected utilities during project design and construction. Although some utility relocations would be addressed within the context of existing franchise agreements (in cases where utilities have such agreements with WSDOT), WSDOT does not intend or anticipate major shifts in fiscal responsibility, such as transfers of costs to local rate payers.

L-003-016

To the greatest extent possible, WSDOT will access SR 520, I-5 to Medina project work sites directly from the SR 520 right-of-way. WSDOT will comply with municipal regulations and permitting requirements, including City of Medina restrictions that apply to operations outside of the WSDOT right-of-way. WSDOT is aware of municipal restrictions and will coordinate with the City of Medina to address identified concerns.

L-003-017

Comment noted.