Seattle City Council

April 15, 2010

Governor Christine Gregoire
Office of the Governor
PO Box 40002
Olympia, WA 98504-0002

Paula Hammond, Secretary
Washington State Department of Transportation
Transportation Building
501 Maple Park Avenue SE
PO Box 47300
Olympia, WA 98504-7300

Jenifer Young
SDEIS Environmental Manager
600 Stewart St., Suite 520
Seattle, WA 98101

Dear Governor Gregoire, Secretary Hammond, and Ms. Young:

L-004-001

Thank you for the opportunity for to provide comments and recommendations on the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. We appreciate the support you have given to our involvement, and the structure of the work groups that were created in ESSB 6392. This letter communicates our perspective as we move into the next stage of cooperative efforts involving the State, the region, and the City of Seattle.

Our comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project fall into four categories:

1) An overview of our policy approach to the project in this cover letter.
2) A set of formal recommendations for the SDEIS (Attachment 1) to improve the project, particularly in the Westside interchange area.
3) Additional recommendations for the SDEIS that include phasing the decisions relating to the construction of two specific project components (Attachment 2). The two components are the second Montlake Bridge and the 24th Avenue (Lake Washington Boulevard) ramps.
4) An additional recommendation for a future project to be analyzed (Attachment 3).

We are committed to moving this project forward towards a 2014 opening for the new bridge and to keeping the project within the projected $4.65 billion budget. We support the vision of the project as a six lane corridor between Medina and I-5 that includes two dedicated high occupancy vehicle (HOV)/transit lanes. Dedicated HOV/transit lanes will immediately improve transit in the corridor and are consistent with the state legislative requirement "to accommodate light rail in the future".

City Hall, 600 Fourth Avenue, Floor 2, PO Box 34025, Seattle, Washington 98124-4025
(206) 684-8888 Fax: (206) 684-8587 TTY: (206) 233-0025
http://www.cityofseattle.gov/council
An EEO employer. Accommodations for people with disabilities provided upon request.

L-004-001

Issues listed are addressed in specific comments below.

L-004-002 The project should be designed and constructed to be ready for conversion from HOV/transit to Bus Rapid Transit (BRT), with a clear and legislatively mandated performance standard for increasing the minimum number of passengers per vehicle in HOV lanes and ultimately the conversion of the HOV/transit lanes to dedicated BRT, as envisioned in the SR 520 High Capacity Transit Plan. Such a performance standard has already been articulated in ESSB 6392, but it is an imperative that the Legislature and Governor take this standard to a level of certainty by adopting additional legislation requiring that action will be taken when appropriate thresholds are reached. It is also critical that the state identify committed revenue to fund transit for the SR 520 corridor.

L-004-003 As we noted in our January 28 letter, "neither Alternative A+ nor M adequately meets the needs and priorities of the City of Seattle and our residents." We oppose designating Alternative A+ as the Preferred Alternative for this project, and recommend that the state identify a new alternative that includes our design alternatives.

The relatively short comment period for the SDEIS precludes the possibility of a full exploration of all possible design options and refinements for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. If accepted by WSDOT, some of the recommendations included in this letter will also require additional design work in order to determine the scale of their potential impacts and costs. Although WSDOT intends to identify a preferred design alternative for the SR 520 Bridge by April 30, 2010, it is our sincere hope that, in the weeks and months ahead, WSDOT will continue to work with the City of Seattle, Metro, ST, and UW as they refine and finalize their plans and prepare to issue a final EIS in late 2010.

Thank you for considering our comments. As the SR 520, I-5 to Medina: Bridge Replacement and HOV Project continues to move forward, we look forward to working in partnership with you to ensure the final design for the corridor is sensitive to the needs of the Seattle communities that surround it.

Sincerely,

Council President Richard Conlin

Councilmember Sally Bagshaw

Councilmember Tim Burgess

Councilmember Sally J Clark

Councilmember Jean Godden

Councilmember Bruce Harrell

Councilmember Nick Licata

Councilmember Mike O' Brien

Councilmember Tom Rasmussen

2

L-004-002

In early 2010, the Washington State Legislature passed and Gov. Gregoire signed Engrossed Substitute Senate Bill (ESSB) 6392. ESSB 6392 directed WSDOT to work with regional agencies to refine components of the SR 520, I-5 to Medina Preferred Alternative, including design refinements and transit connections, and transit planning and financing. WSDOT led a workgroup process in collaboration with the City of Seattle, King County, the University of Washington and Sound Transit.

WSDOT's approach to managing freeway corridors are based on existing strategies for reducing collisions and congestion on urban freeways. These strategies were presented to the ESSB 6392: Design Refinements and Transit Connections Workgroup Technical Coordination Team (TCT) for discussion. The TCT considered WSDOT's strategies and developed final recommendations for managing traffic in the new SR 520 corridor. These strategies included continuous HOV lanes from I-5 to SR 202, variable tolling, continued use of traffic management applications such as ramp meters, variable speed limits, and lane control, as well as companion incident response services and enforcement. The final recommendations will result in a corridor that is well positioned to meet the established HOV lane performance standards and corridor performance expectations expressed by the legislature and Seattle City Council. The Corridor Management Plan Technical White Paper is available at http://www.wsdot.wa.gov/NR/rdonlyres/0346C8DC-2063-4E6F-8B6D-902EB05C37EE/0/CorridorManagementPlan.pdf.

The HOV lane designation for SR 520 is established by legislation and by WSDOT policy. WSDOT's general policies regarding the HOV system are located on the WSDOT website at: http://www.wsdot.wa.gov/HOV/Policy.htm. The general HOV policies are:

- To maximize the people-carrying capacity of the freeway system by

L-004-004

ATTACHMENT 1: COMMENT LETTER FOR THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)

Following the Washington State Department of Transportation's (WSDOT) release of the SDEIS in January 2010, the Seattle City Council initiated a two month review and assessment process that was intended to inform the content of this letter. As part of that effort, we hired transportation consultants from Nelson\Nygaard and also worked closely with the Seattle Department of Transportation (SDOT), WSDOT, Sound Transit (ST), King County Metro (Metro), and the University of Washington (UW). Our key goals for the review and assessment process were to develop specific design recommendations for the new SR 520 Bridge that would help improve transit service and connectivity, the pedestrian and bicycle environment, neighborhoods, traffic operations, and open space in the vicinity of the corridor. We also identified the following four assumptions to help guide the development of any new design elements and/or system-level alternatives that might emerge from our SDEIS review process:

1) Between Medina and I-5, SR 520 will have a total of six travel lanes, including four general purpose lanes (two in each direction) and two high occupancy vehicle (HOV) or transit lanes (one in each direction);

2) The total budget for SR 520 corridor improvements, including mitigation, will not exceed $4.65 billion;

3) No additional environmental impact assessments, including the publication of an additional SDEIS, will be necessary; and

4) The design alternatives evaluated as part of this process will generally be within the scope of either the DEIS or SDEIS that WSDOT has already completed for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project.

We believe that most of the recommendations included in this letter are substantially within the framework and intent of these baseline assumptions. Each of our recommendations is designed to significantly improve the portion of the SR 520 corridor that extends through the City of Seattle. Consistent with the ongoing design refinement process described in ESSB 6392, we would welcome an opportunity to continue working with the State to analyze the potential outcomes of the policy and design options we are supporting in this letter.

Our recommendations are as follows:

Design Recommendations

- ***Construct the replacement corridor in a six-lane configuration.***
  We reaffirm our position that the replacement corridor should be designed to accommodate no more than six lanes of traffic, including two lanes for transit and HOV and four lanes for general purpose traffic.

L-004-005

- ***Locate Westside interchange at Montlake, with conditions.***
  More than 50 percent of the current daily traffic on SR 520 uses the existing Montlake interchange. The interchange, which is located just south of the Montlake Cut, offers convenient access to several institutions and amenities that draw visitors and employees from across the region, including UW and the Washington Park Arboretum. However, the interchange is also sited in the heart of Seattle's historic Montlake neighborhood, where it abuts the community's commercial district on 24th Avenue East. If a new, replacement interchange is to be sited in Montlake, the following elements should be incorporated into its design:

1) The interchange must be redesigned to reduce the overall footprint, to be more compatible with the Montlake community, scaled to its location within a neighborhood, and organized to promote the most effective pedestrian, bicycle, and transit connections. We request that continued collaboration occur between WSDOT, SDOT, and if appropriate, consultants to redesign the interchange to operate as an urban intersection, not a

3

providing incentives to use buses, vanpools, and carpools.
- To provide capacity for future travel growth.
- To help reduce transportation-related pollution and dependency on fossil fuels.

Additional legislative direction or endorsement for HOV capacity beyond the policy already listed above is an action outside WSDOT purview and your request is better directed to the legislature directly.

L-004-003

Following publication of the SDEIS, WSDOT initiated a 90-day public comment period. Based on public comments and additional analysis, WSDOT and FHWA developed a Preferred Alternative that is similar to Option A, but with a number of design refinements. As directed by ESSB 6392, WSDOT worked with City of Seattle staff during summer 2011 to refine aspects of the preferred alternative. See Chapter 2 of the Final EIS for a description of the planning process and the Preferred Alternative.

L-004-004

Comment noted. Issues listed are addressed in specific comments below.

L-004-005

The Preferred Alternative includes a Montlake Boulevard interchange and lid that are modified from Option A. Modifications include a full lid from Montlake Boulevard to the Lake Washington shoreline and bus stops on the lid for both eastbound and westbound buses. The intent is to enhance the pedestrian environment in the central part of the Montlake neighborhood while providing a better location and environment for the regional bus stops incorporated in the transit/HOV direct access ramps (see Chapter 2 and Sections 5.1 and 5.3 of the

L-004-005

highway interchange. Options for a redesigned interchange should include a tightened intersection, a diverging diamond configuration, and loop ramps under the east end of the Portage Bay Bridge.

Ramp intersections should also be tightened and slip ramps eliminated. These design refinements will help to improve bicycle and pedestrian safety along Montlake Boulevard and support creating an interchange that is more suitable for a neighborhood setting like Montlake.

L-004-006

2) New HOV/transit-only ramps should be located at 24th Avenue East rather than at Montlake Boulevard. Placing the HOV/transit-only ramps at 24th Avenue East would require buses and carpools traveling between SR 520 and the UW and Montlake areas to drive about two blocks farther in order to utilize a direct access ramp. However, locating the HOV/transit-only ramps at 24th Avenue East would create an opportunity to construct a large lid over SR 520, between Montlake Boulevard and 24th Avenue East that would not be bisected by any vehicle lanes.

L-004-007

3) A new lid over SR 520, between Montlake Boulevard and 24th Avenue East, would create a buffer between the Montlake neighborhood and SR 520. It would also enhance the bicycle and pedestrian environment on Montlake Boulevard. Bus stops should be included on this lid.

L-004-008

4) Priority signals for transit should be provided at key intersections in the vicinity of the Montlake interchange. These include the intersection of Northeast Pacific Street and Montlake Boulevard, and intersection at the north end of the Montlake interchange. This form of signalization, also referred to as a "queue jump," would allow buses to clear busy intersections before other traffic is allowed to move.

L-004-009

5) Dedicated HOV/transit lanes should be provided on Montlake Boulevard. At a minimum, these lanes should extend from the intersection of Northeast Pacific Street and Montlake Boulevard to the intersection of 23rd Avenue and Lake Washington Boulevard.

6) WSDOT should also commit to working with SDOT to consider extending the dedicated HOV/transit lanes on Montlake Boulevard to the north, and on 23rd Avenue to the south. The southern corridor should be reviewed as far as the intersection of Madison and 23rd Avenues.

L-004-010

7) The High Capacity Transit Plan for SR 520 lacks specificity with regard to service availability, particularly mid-day, over the phase- in of new transit service on SR 520. WSDOT should work with Metro and ST to ensure that there will be an adequate base level of mid-day service between the UW/Montlake area and the Eastside when the current flyer stop is closed. A specific transit service plan for the ramp up to and duration of construction of the corridor should also be developed. A reduction in frequent and reliable service is unacceptable. WSDOT is heavily dependent upon the implementation of new transit service in order to meet the corridor's purpose of improving mobility for people across Lake Washington. As a result, we believe more specific commitments to transit service investments need to be sought from Metro and ST.

L-004-011

8) WSDOT should set a goal of identifying design alternatives that would reduce the number of general purpose lanes exiting westbound SR 520 at Montlake Boulevard from two to one.

L-004-012

- ***Direct project mitigation funds to the Montlake Triangle area.***
  The Montlake Triangle, at the intersection of Montlake Boulevard and Northeast Pacific Street, is a heavily traveled area that will be significantly impacted by the replacement and expansion of the SR 520 corridor. As such, the Montlake Triangle, which is a major pedestrian and transit hub and will soon be home to the U-Link light rail station, should be a strong candidate for project mitigation funds. Consistent with ESSB 6392, we also look forward to convening a work group to study and make recommendations about transit connections in this area. One of the Council's primary goals for this work is to identify ways to reduce the walking distances between all the transit modes that will serve the Montlake Triangle into the future and to improve the pedestrian environment in this area.

4

Final EIS).

Under ESSB 6392, WSDOT has collaborated with the City of Seattle, King County Metro, and Sound Transit as part of the Design Refinements and Transit Connection Workgroup. Also, WSDOT has worked with the City of Seattle's Pedestrian Advisory Board and Bicycle Advisory Board to develop design refinements to address bicycle and pedestrian connections and amenities. The suggested design refinements are included in the ESSB 6392: Design Refinements and Transit Connections Workgroup Recommendations Report (see Attachment 16 for more details). Some of these recommended refinements are at a greater level of design development than is addressed in the NEPA documents, including this Final EIS. After the Final EIS has been issued, input from the ESSB 6392 processes will continue to be considered by WSDOT and FHWA as design development progresses.

L-004-006

Consistent with Seattle City Council recommendations, the Preferred Alternative includes new HOV/transit-only ramps located at 24th Avenue E.

L-004-007

Please see the response to Comment L-004-005.

L-004-008

Transit signal priority is not the same type of traffic management tool as a queue jump. Transit signal priority modifies normal signal operation to give priority to transit and can be implemented with or without a queue jump. A queue jump is the use of a transit and/or HOV lane to allow vehicles to bypass traffic congestion. A queue jump can be used in conjunction with transit signal priority.

L-004-013 • ***Minimize the height of the cross-lake bridge deck.***
The SDEIS considers a 32-foot high bridge deck on the cross-lake, floating portion of the SR 520 Bridge. At more than 20 feet higher than the existing bridge deck, 32 feet is unacceptable. A bridge height of 32 feet would have significant, negative visual impacts and degrade important scenic and historic viewsheds from the Washington Park Arboretum, UW, and along Lake Washington Boulevard. We recommend that the height of the replacement bridge deck be lowered to as close to 20 feet as possible without compromising the safety of the corridor.

L-004-014 • ***Split the bridge corridor and narrow shoulders through the Arboretum.***
To minimize impacts on the Arboretum and provide for the daylighting of the area underneath the bridge, the eastbound and westbound lanes on SR 520 should be split through Foster Island and as much of the Arboretum as possible. This design modification is important to ensure that the corridor can accommodate light rail in the future. The gap should be as wide as feasible without interfering with traditional cultural property. The amount of pavement should be reduced by narrowing the shoulder width by two feet on each side of both eastbound and west bound lanes, for a total pavement reduction of 8 feet through the Arboretum.

L-004-015 • ***Reduce the width of the Portage Bay Bridge.***
In the SDEIS, Option A+ calls for a seven lane configuration across Portage Bay from Montlake to I-5. This configuration includes four general purpose lanes, two HOV/transit lanes, and one westbound auxiliary lane. We support eliminating the auxiliary lane and replacing it with a managed shoulder that could be used as a traffic lane during peak travel times. Adoption of this concept could reduce the footprint of the Portage Bay Bridge.

L-004-016 • ***Ensure that the new bridge is designed and constructed to accommodate high capacity transit.***
In 2008, average weekday transit ridership on the SR 520 Bridge was about 15,000. By 2020, that figure is expected to increase to 25,000 daily riders. As the demand for transit service along the SR 520 corridor continues to climb, the new bridge should be designed and constructed in a manner that will accommodate appropriate new modes of high capacity transit, including dedicated BRT and/or light rail.

With regard to accommodating light rail along the SR 520 corridor, we support maintaining flexibility for the region to make this decision at a later date. We also encourage WSDOT, ST, and the Federal Highway Administration (FHWA) to evaluate the potential for a future cross-section for the floating bridge that could accommodate four lanes of vehicular traffic (two in each direction), two lanes of light rail (one in each direction), and a bicycle and pedestrian pathway within a 115-foot wide right of way.

A report by Nelson/Nygaard that was commissioned by the Seattle Mayor's Office identified three possible issues that could compromise the ability of SR 520 to accommodate future light rail:

1) A gap between the eastbound and westbound lanes on SR 520 would need to extend through the Arboretum in order to allow light rail. The Council has already recommended this gap and we endorse this element, which could be included under the current SDEIS and without delaying the project.
2) The roadway on the bridge deck would have to be expanded to 125 feet in order to allow for light rail. The Council and the neighborhoods adjacent to SR 520 have worked for years to narrow the bridge design to minimize its footprint and impacts and to minimize the possibility of restriping the bridge for additional vehicle lanes. We note that light rail is being added to the I-90 corridor through design modifications with the approval of FHWA, WSDOT and ST that allow for narrower shoulders than the cross section of SR 520 in the Mayor's report. Given this precedent, as well as information from WSDOT that adding additional width would be feasible if desired, the Council does not support widening the bridge deck to 125 feet at this time. It appears that the current floating bridge design with the addition of the split corridor design modification would be compatible with light rail. The Council is committed to minimizing the footprint and avoiding significant delay of the project.

5

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. Transit signal priority would be retained where it is currently provided at the NE Pacific Street/Montlake Boulevard NE intersection (including the HOV queue-jump lane) and on Montlake Boulevard NE northbound at E Shelby Street. Transit signal priority would also be provided on Montlake Boulevard NE southbound at E Shelby Street, at the Montlake Boulevard NE/HOV Direct Access road intersection, and the NE 24th/HOV Direct Access road intersection.

Please see the Final Transportation Discipline Report, Chapter 8 (Attachment 7 to the Final EIS) for more information about transit facilities that would be provided with the Preferred Alternative.

L-004-009
The Preferred Alternative includes HOV lanes on Montlake Boulevard between SR 520 and the Montlake Triangle.

While SR 520, I-5 to Medina project would not provide HOV lanes on Montlake Boulevard south of SR 520, the Preferred Alternative would improve transit reliability 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 following the SDEIS.

Regarding the concern about reviewing the southern corridor, WSDOT also reevaluated the study area for effects on local transportation in preparing the analysis for the Final EIS. This reevaluation considered potential effects along the 23rd/24th/Montlake corridor as far south as

L-004-016

3) Additional pontoons would be required to support the weight of light rail on the bridge. WSDOT has indicated that the design would support the additional pontoons and that there are no technical reasons that require adding them at the current time. Adding pontoons now would require additional environmental work and delay the project. Given that the region has not decided to construct light rail on the corridor, it would not be an appropriate use of limited public funds to include the pontoons in the current project or delay the project to complete the required environmental analysis.

There is no current plan for light rail on this corridor. That option was deferred by the ST Board through the ST planning process. The ballot measure that passed in November 2008 includes significant increases in funding for bus operations on the SR 520 corridor. Additionally, the Lake Washington Urban Partnership is funding the capital costs for 45 new buses dedicated to this corridor and Metro is dedicating funding for expansion of bus service. Buses may provide a more flexible and effective form of high capacity transit for this project area.

If the region were to proceed with light rail on the SR 520 corridor, there would have to be additional environmental assessment, routes determined for light rail to traverse after leaving the corridor, a funding plan approved by voters, and design and engineering work.

We therefore recommend that the design for the SR 520 corridor accomplish the following in order to meet the legislative requirement to accommodate light rail:

1) Ensure that no substantial element of the corridor, such as overpasses or highway portions, would have to be demolished and rebuilt in order to construct light rail.
2) Include the recommended gap between the eastbound and westbound lanes in the Arboretum area.
3) Have a design plan that includes light rail on the current 115-foot wide bridge corridor and/or that permits adding additional width without demolishing or rebuilding the bridge deck.
4) Ensure that the pontoons are designed so that the additional stabilization pontoons can be added without major disruption of the corridor or significant modification of the existing pontoons.

L-004-017

- ***Enhance the streetscape along Montlake Boulevard and in the vicinity of the Montlake interchange.***
Montlake Boulevard is a heavily traveled arterial that is also an important corridor for pedestrians and bicyclists. Improving lighting, signage, landscaping, and bicycle and pedestrian facilities along Montlake Boulevard and in the vicinity of the Montlake interchange would help to make this area more "human scale" and enhance its safety for those who are traveling by foot or by bike. This area should be designed in accordance with the Olmsted plan for Montlake Boulevard and Montlake Boulevard should have a fully landscaped median.

- ***Design bicycle and pedestrian facilities along the SR 520 corridor to City of Seattle standards at all locations.***
The planned bicycle and pedestrian route along the SR 520 corridor, from Seattle to Medina, is an important component of the design for the new bridge. This new facility will expand recreational and commuting opportunities for residents on both sides of Lake Washington and complete a critical link in our region's expanding network of bicycle and pedestrian paths. New connections on Montlake Boulevard, connections west of Montlake Boulevard to the Montlake Playfield and bicycle corridors to Capitol Hill, and connections north of the Montlake Boulevard/Pacific Street intersection to the Burke Gilman Trail and the University of Washington should include minimum widths of 16 feet for major pedestrian routes and 12 feet for major bicycle routes. Design modifications should be identified, if needed, for these routes.

L-004-018

- ***Develop a noise mitigation plan for SR 520 in partnership with nearby residents.***
We fully support WSDOT's plans to develop a noise mitigation plan for SR 520. Residents of the neighborhoods adjacent to the corridor should have an opportunity to participate in this planning process. In addition to federally recognized noise mitigation measures, the plan should include new and innovative practices that have the potential to effectively reduce noise impacts. We also encourage WSDOT to fully

6

the 23rd Avenue/East Madison Street intersection. However, based on standard methodology, the local study area reported in the Final EIS was determined by the change in traffic volumes on the local streets with the No Build Alternative versus the Preferred Alternative during peak hours; only intersections where traffic volumes would increase by more than 5% were included. Five percent was selected as the criterion because a change in traffic of that amount could result in measurable operational changes. If traffic volume increases were less than 5 percent on adjacent streets, the intersection was not included in the analysis. Thus, all intersections not included in the local study area would experience an overall change in traffic volumes during the a.m. and p.m. peak hours of less than 5 percent with implementation of the project.

While the Final EIS reports local transportation effects for the same study area as the SDEIS, work groups formed under ESSB 6392 looked at the expanded study area described in the comment to evaluate potential transit improvements and traffic calming. As described above, WSDOT has committed to fund traffic calming measures along Lake Washington Boulevard and to work with the Seattle Department of Transportation on further measures to manage traffic in the Arboretum.

L-004-010

Please see Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for descriptions and exhibits dealing with transit service and rider connections in the Montlake interchange area after removal of the Montlake Freeway Transit Station. The discussion includes a review of transit service and rider transfers/connections in the Montlake interchange area, including the Montlake Multimodal Center, during peak and off-peak periods. WSDOT has coordinated and will continue to coordinate closely with King County Metro, Sound Transit, and the Seattle Department of Transportation as the design is finalized and construction staging and sequencing plans are developed.

L-004-018 implement the recommendations from the Health Impact Assessment that was completed for SR 520 in 2008 by Seattle-King County Public Health and the Puget Sound Clean Air Agency.

L-004-019 • ***Review and improve plans for managing the impacts of construction in the new SR 520 corridor in partnership with nearby residents, institutions, and businesses.***
The impacts of construction, including truck traffic, will be significant in neighborhoods around the 520 corridor. WSDOT should carefully review the construction management plan for SR 520 and coordinate with the agencies that are managing other nearby projects (such as University Link) to minimize impacts.

Policy Recommendations

L-004-020 • ***Develop and implement a corridor management plan that includes minimum performance standards for transit/HOV and general purposes lanes with triggers for mandatory actions to maintain those standards.***
Consistent with ESSB 6392, we concur that WSDOT should develop performance standards for the HOV/transit lanes on SR 520. We recommend that WSDOT develop a corridor management plan, to be adopted by the Legislature and approved by the Governor that states a minimum performance standard that ensures speeds in the HOV/transit lanes do not fall below 45 miles per hour more than 5 percent of the time during peak hours as measured and reported quarterly. If the performance standard is not met, mandatory triggers should be in place to increase the minimum number of passengers per vehicle in the HOV lanes or conversion of the HOV lanes to transit only lanes should occur. We also recommend that as part of the corridor management plan, performance standards be developed for the general purpose lanes on SR 520. We support the potential use of dynamic variable tolling along the entire corridor that would allow for increasing toll rates in order to achieve specific performance standards for general purpose as well as HOV/transit lanes. To ensure that these standards are enforced, legislation needs to be adopted mandating the triggers for actions to meet these performance goals.

L-004-011

The intersections and ramps in the SR 520/Montlake Boulevard interchange area have been designed to accommodate expected traffic volumes and to provide acceptable levels of service with the removal of the Lake Washington Boulevard ramps. A single-lane exit would not be feasible because it would result in traffic backups that would affect the mainline traffic flow on SR 520, and would not facilitate congestion relief.

L-004-012

The ESSB 6392 workgroup outcomes, including information regarding coordination with Sound Transit for connectivity with the new U-Link station, are presented in the ESSB: Refinements and Transit Connections Workgroup Recommendations Report (Attachment 16 for more details). Additionally, see Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for bus stop locations and walk distances with the Preferred Alternative, which were determined through the ESSB 6392 workgroup process.

L-004-013

The height of the floating bridge with the Preferred Alternative would be approximately 20 feet above the water. It would be approximately 10 feet higher than the existing bridge, and approximately 5 to 10 feet lower than previous designs considered in the DEIS and the SDEIS. See Chapter 2 of the Final EIS for design information with the Preferred Alternative.

L-004-014

Consistent with Seattle City Council recommendations, the Preferred Alternative includes a gap between the eastbound and westbound lanes on SR 520 over Foster Island and through the Arboretum. This design modification enhances the ability of the corridor to accommodate light rail in the future. To accommodate the gap while minimizing effects to the

ATTACHMENT 2: COMMENT LETTER FOR THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT WITH PHASING RECOMMENDATIONS

L-004-021

- ***Phase the decision on construction of the proposed second bascule bridge at Montlake Boulevard and test measures that may eliminate the need for construction. Require that the bridge be designed to provide priority for transit, pedestrian, and bicycle traffic if it is constructed.***

We continue to have reservations about the potential construction of a second bascule bridge across the Montlake Cut at Montlake Boulevard. Building a parallel bascule bridge at Montlake will likely necessitate the removal of two residential properties and further divide the Shelby-Hamlin neighborhood, which is already bisected by a 4-lane Montlake Boulevard that is traveled by more than 50,000 vehicles each day. If a second bascule bridge is to be constructed at Montlake, we recommend it be built to meet the following conditions:

1) The second bridge should be built to accommodate no more than two lanes of traffic and include dedicated bicycle and pedestrian facilities. In order to reduce additional negative impacts on the Shelby-Hamlin neighborhood, the footprint of the new bridge should be as narrow as possible without compromising the safety of Montlake Boulevard, transit operations, or Seattle standards for bicycle and pedestrian facilities.

2) The existing Montlake Bridge should remain a 4-lane roadway.

3) If the second bridge is completed, the two crossings should operate in a 4+2 configuration, with four general purpose lanes and two dedicated HOV/transit lanes. If possible, the dedicated HOV/transit lanes should be located on the original bridge, with the northbound lane operating as a counterflow. This will allow center line operation, permit the use of existing electric wires, and avoid the installation of new electric wires on the new bridge.

We will only consider supporting the construction of a second bridge across the Montlake Cut if the additional bridge is used to provide the capacity for dedicated facilities for HOV, transit, bicyclists, and pedestrians. We do not support the creation of additional roadway capacity along Montlake Boulevard for single occupant vehicles and other general purpose traffic.

In order to determine whether the second bridge is needed, WSDOT, SDOT, Metro, and ST must work together to design and test systems that will facilitate the movement of transit through the Montlake corridor, such as signalization, signal timing, signal queue jumping for HOV/transit, dedicated HOV/transit lanes, and other techniques. WSDOT, SDOT, and Metro should identify and analyze traffic management options/plans for the entire neighborhood, including specifically the corridor between University Village and 23rd and Madison, and assess their impacts on arterials and neighborhood streets. The goal of the testing program should be to determine whether a combination of strategies can ensure the reliable movement of both transit using the SR 520 corridor and north-south transit through the City of Seattle.

L-004-022

- ***Reconfigure the ramps between SR 520 and Lake Washington Boulevard and develop a traffic management plan for the Washington Park Arboretum. Phase the decision on the construction of these ramps, test the effectiveness of a traffic management plan and other measures to protect the Arboretum, and ensure reliable movement of transit and other vehicular traffic through the 23rd Avenue/Montlake corridor.***

The 230-acre Washington Park Arboretum is one of the most cherished parks in the Puget Sound region and protecting its character and fragile environment is one of the City Council's top priorities for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. In addition to serving as a "living museum" of diverse plant species that draws visitors from around the world, the Arboretum also provides needed open space and recreational opportunities for thousands of nearby residents. After carefully considering the trade-offs associated with including ramps between SR 520 and Lake Washington Boulevard near the western edge of

8

Arboretum, the shoulder widths on the eastbound structure were reduced (see Chapter 2 of the Final EIS).

L-004-015

As shown in Exhibit 2-7 of the Final EIS, the Preferred Alternative includes six lanes and a managed shoulder across Portage Bay. By eliminating the auxiliary lane and using a managed shoulder, the Preferred Alternative reduces the roadway width as compared to Option A.

L-004-016

While WSDOT believed that the design of the SR 520, I-5 to Medina project already accommodated potential future light rail, the agency worked with the City of Seattle and Sound Transit to identify changes that would enhance the corridor's rail compatibility. The Preferred Alternative reflects these design changes and allows for two potential future rail options:

- Option 1: Convert the HOV/transit lanes to light rail. This approach would accommodate light rail by converting the HOV lanes to exclusive rail use. Trains would use the direct-access ramps at Montlake Boulevard to exit, or could utilize a 40-foot gap between the eastbound and westbound lanes of the west approach to make a more direct connection to the University Link station at Husky Stadium.
- Option 2: Add light-rail only lanes. This approach would allow several connections—via a high bridge, a drawbridge, or a tunnel—to the University Link station.

Both approaches would require the addition of supplemental floating bridge pontoons to support the additional weight of light rail, should the regional decision to do so be made and funded. Such a decision would need to be planned and programmed by regional land use and transit

L-004-022

the Arboretum, we have concluded that if ramps are built in this area, they must meet the following conditions:

1) The ramps must be reconfigured to connect to Lake Washington Boulevard at 24th Avenue East, thereby supporting the goal of constructing a larger, uninterrupted lid over SR 520 between 24th Avenue East and Montlake Boulevard, and avoiding the presence of ramps in the Arboretum.

2) A partial lid that extends east over the eastbound lanes of SR 520, from 24th Avenue to the Arboretum, should be constructed to help improve pedestrian connections to the Arboretum trail system.

3) WSDOT must agree to work with the City of Seattle to develop and implement a traffic management plan for the Arboretum. Such a traffic management plan would apply to the area that is bounded by SR 520 to the north, Lake Washington Boulevard to the east, Madison Street to the south, and 23rd Avenue to the west. The traffic management plan may include, but need not be limited to, traffic calming, tolling, reduced speed limits, and ramp use restrictions.

4) As part of the traffic management plan, the existing on- and off-ramps in the Arboretum should be closed early in the SR 520 project's construction phase. The need for replacement ramps would then be reassessed once construction is nearing completion.

The Council wishes to implement this traffic management plan as quickly as possible and analyze the outcomes. Measurable goals should be set in consultation with the Arboretum Foundation, WSDOT, Metro, and SDOT, and sets of measures should be tested until the goals are effectively met. Implementation should proceed in conjunction with the work on 23rd and Montlake Avenues, and goals should include effective management of that corridor as well.

agencies, funded by a public vote, and evaluated in its own environmental analysis.

The SR 520 High-Capacity Transit Plan, endorsed in 2008 by the state, King County Metro Transit, and Sound Transit, found that demand for transit in the 520 corridor until at least 2030 could be met with bus rapid transit utilizing HOV/transit lanes, complementing Sound Transit's East Link. At the same time, the plan acknowledges that after 2030, significant increases in cross-lake travel may warrant dedicated high-capacity transit facilities on both I-90 and SR 520. Sound Transit will continue to study the demand and need for light rail. More information on this topic is available at: http://www.wsdot.wa.gov/Projects/SR520Bridge/Library/technical.htm

L-004-017

WSDOT will develop a landscape plan for the Montlake lid and provide it to the City for review and coordinate with them during the design and construction plan phase of the project. Development of the Montlake area landscape plan will also be a forum for implementing commitments with interested parties under compliance with Section 106 of the National Historic Preservation Act. This will also be the time to incorporate recommendations for pedestrian and bicycle connectivity developed by the ESSB 6392 workgroup in collaboration with the City of Seattle Pedestrian Advisory Board and Bicycle Advisory Board.

L-004-018

WSDOT has worked with communities near the project to develop mitigation measures for noise that would be generated during project construction and operation. The Preferred Alternative includes a number of noise reduction strategies in the SR 520 corridor, such as 4-foot concrete traffic barriers with noise-absorptive coating, reducing the speed limit through the Portage Bay area to 45 mph, encapsulating expansion joints, and using noise-absorptive materials around the

L-004-023

ATTACHMENT 3: RECOMMENDATION FOR A FUTURE PROJECT TO BE ANALYZED

Evaluate a HOV/transit fixed span bridge at a location east of Montlake Boulevard. This option is not included in the current SDEIS but offers potential future benefit and should be evaluated as a separate project.
There are still major concerns about whether the configurations included in the SDEIS will actually be able to successfully facilitate the movement of traffic through the Montlake area, especially transit. We recommend that the state begin a process to review a possible high bridge to the east of Montlake Boulevard, between the MOHAI building and Marsh Island. Such a bridge would be an important option to provide a future light rail or bus rapid transit connection to Pacific Street and the University Link light rail station. Completing an environmental assessment of this potential bridge crossing could be very useful in developing future transportation plans for this area, especially if this project ultimately does not proceed with some of the elements that have been identified for possible phasing and further study. We recommend that the environmental analysis for a high HOV/transit bridge east of Montlake Boulevard be undertaken before the construction plans for SR 520's west approach are finalized.

10

Montlake and 10th Avenue East/Delmar Drive East lid portals. WSDOT will continue to consider other noise reduction methods as design development progresses. The noise reduction strategies included in the Preferred Alternative reduce noise sufficiently in the Seattle portion of the project area such that noise walls are not recommended in this 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 (see Section 5.7 of the Final EIS).

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. Information on noise modeling results for the Preferred Alternative can be found in Section 5.7 of the Final EIS and the Noise Discipline Report Addendum (Attachment 7 to the Final EIS).

The SR 520 Health Impact Assessment (HIA) was developed in response to ESSB 6099 to support and inform legislatively mandated mediation efforts, and was to be included in the Project Impact Plan developed by the Mediation Group. King County Health and the Puget Sound Clean Air Agency led preparation of the HIA with support from WSDOT. All parties agreed that the HIA was not part of the NEPA process, though the HIA used data from the Draft EIS and the SDEIS referenced the results of the HIA. In general, the HIA recommended potential measures that could be incorporated to improve the region's overall quality of health, rather than attributing specific health outcomes to the project itself. However, protecting human health is one of the reasons behind many of the studies conducted in the preparation of an EIS.

The HIA provided a more general discussion of noise effects and

measures to reduce potential effects than is provided in the Noise Discipline Report and Addendum. However, the Preferred Alternative is consistent with the recommendations of the HIA regarding long-term noise; the HIA suggests decreased noise through vegetation that dampens sound, quieter pavement, noise walls, and landscaped lids. See the Noise Discipline Report and Addendum for information on which measures are analyzed and why some of the suggestions of the Health Impact Assessment are not analyzed as noise reduction measures even thought they are included in the Preferred Alternative.

During construction, the project will need to meet the requirements of the City of Medina and City of Seattle noise ordinances and the conditions of any variance that may be obtained.

Consistent with HIA recommendations, mufflers would be required on all engine-powered equipment, and all equipment would be required to comply with EPA equipment noise standards. WSDOT is working with area residents to develop a Community Construction Management Plan to reduce potential effects (see the outline in Attachment 9 to the Final EIS). Additional noise mitigation measures may be implemented as more details on the actual construction processes are developed and as part of any noise variance that may be required. See the Mitigation section of the Noise Discipline Report Addendum (Attachment 7 to the Final EIS) for further discussion.

Other measures suggested in the HIA regarding construction could potentially reduce noise. WSDOT encourages its contractors to reduce idling time of equipment and vehicles, consistent with the HIA recommendations. The contractor(s) working on the project will be encouraged to provide a shuttle service for construction workers, as recommended in the HIA. Where possible and practicable, WSDOT can negotiate incentives that could result in shorter construction durations and reduced environmental effects, consistent with the HIA

recommendations. Chapter 3 of the Final EIS provides further information about construction staging, duration, and activities.

Measures suggested in the HIA regarding transportation demand management during construction could also potentially reduce noise. As discussed in the Final Transportation Discipline Report (Attachment 7 to the Final EIS), WSDOT is developing a trip reduction plan focused on keeping people moving through congested areas during construction. This is expected to include a set of temporary transit demand management (TDM) and transit enhancements that will provide additional travel options to people who travel through the study area. Because WSDOT would maintain two through lanes on SR 520 in each direction during the peak periods throughout project construction, WSDOT has not identified an effect that would require additional bus service on SR 520. As construction staging and phasing plans are finalized with the contractor, additional service on the corridor during construction could be considered if WSDOT determines that new effects would occur.

See the response to Comment F-003-006 for additional information about how WSDOT will implement measures recommended in the Health Impact Assessment to address air quality during construction.

L-004-019

The Final EIS provides information about construction mitigation measures and the process by which specific mitigation commitments are defined (see Chapter 6). Construction mitigation measures will be developed in greater detail as design progresses and construction plans are developed, and as the project proceeds through the permitting and approval process. WSDOT will continue its ongoing coordination with stakeholders and the communities that will be directly affected by construction of the project. Permit and approval jurisdictions will provide public notice of construction activities and allow opportunity for feedback.

This may include seeking a noise variance, haul truck traffic route modification, and other approvals for construction activities as appropriate.

L-004-020

Please see the response to Comment L-004-002 for information regarding the Corridor Management Plan.

L-004-021

Keeping the capacity of the Montlake Cut crossing at 4 lanes would not satisfy the purpose and need of improving mobility in the SR 520 corridor. As discussed in the Section 4(f) Evaluation (Chapter 9 of the Final EIS), the SR 520, I-5 to Medina project would meet its purpose and need by increasing traffic mobility across the Montlake Cut north of SR 520. The Montlake interchange area is currently congested for several hours per day, with much of this congestion caused by vehicles traveling between SR 520 and points north such as the University of Washington (UW) and north Seattle neighborhoods. The existing Montlake Bridge is a limiting factor in the flow of traffic northward from SR 520. Under future No Build conditions, congestion along Montlake Boulevard could increase to the point where queuing traffic could impede the flow of vehicles on the SR 520 mainline. Therefore, all of the 6-Lane Alternative design options evaluated ways to provide additional traffic capacity across the Montlake Cut.

The Preferred Alternative includes a second bascule bridge across the Montlake Cut that provides additional capacity for transit/HOV, bicycles, and pedestrians. The bridges would operate with three lanes in each direction (two general purpose and one HOV); the existing bridge would serve southbound traffic, and the new bridge would serve northbound traffic. In addition to the three travel lanes, each bridge would have a bicycle lane and sidewalks. However, WSDOT is developing measures to determine the appropriate timing for construction of the new bascule

bridge. Please see Chapter 2 of the Final EIS for detailed information about the configuration of the bridges and the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for transit effects in the Montlake area.

L-004-022

The Preferred Alternative reduces effects on the Arboretum by eliminating the existing Lake Washington Boulevard ramps and the R.H. Thomson Expressway ramps. Westbound SR 520 traffic would access Lake Washington Boulevard through a new intersection located on the Montlake Boulevard lid at 24th Avenue East. See the response to Comment L-004-005 for more information on the Montlake lid design. ESSB 6392 directs WSDOT to develop a mitigation plan for the Washington Park Arboretum. Final recommendations from the ESSB 6392 workgroup include suggested design modifications to minimize effects on the Arboretum facility, traffic management discussions, and an Arboretum mitigation plan (See Attachments 9 and 16 to the Final EIS).

L-004-023

The intent of the EIS process, as defined by federal and state regulations implementing NEPA and SEPA, is to evaluate a reasonable range of alternatives that meet purpose and need for the project while avoiding or minimizing harm to the environment. The SR 520, I-5 to Medina project, evaluated a reasonable range of alternatives within the development of the Draft EIS and SDEIS. The history of alternatives considered and those rejected from further study is documented in chapter 1 of the SDEIS Range of Alternatives Discipline Report. Among these alternatives is information documenting consideration of a fixed bridge east of the existing Montlake Bridge and reasons why it was screened from further study. Chapter 2 of the Final EIS also provides a review of project alternatives, which led to the development of the Preferred Alternative.