

Jenifer Young
 Environmental Manager
 SR 520 Program Office
 600 Stewart St., Suite 520
 Seattle, WA 98101



RE: SR 520 SDEIS Public Comments

Dear Ms. Young:

C-026-001

On behalf of the Cascade Bicycle Club and our over 12,000 members, we appreciate the opportunity to provide comments on the SR 520 SDEIS alternatives. We appreciate the analysis and extensive effort by the State Department of Transportation in working to create a design that responds to the needs of the current users and future generations. With a significant percentage of Cascade's membership residing in the affected neighborhoods, we are vested in the outcome of this project. If designed right, we believe the SR 520 replacement will provide much needed opportunities for cyclists throughout the region, while significantly increasing this transportation mode.

However, we do not find the SR 520 alternatives as proposed to present the type of infrastructure design that will be desired 75 years from today (projected project life-span). With this premise, we encourage the State to adopt a preferred SR 520 alternative that demonstrates a stronger commitment to sustainable modes of transportation and the movement of people, while lessening the impact on the surrounding environment and communities.

While we have concerns with all alternatives as proposed in the SDEIS, we are particularly concerned with Alternative A (plus sub options), as this has the least support for bicycling and walking, but also because this alternative is within the direction currently supported by the Legislative Working Group.

C-026-002

Concerns and Recommendations, particularly in response to SDEIS A plus sub options:

Bicycle and Pedestrian Access/Safety: Our primary concern with the proposed alternatives, particularly Alternative A, is the lack of support for nonmotorized travel through the project corridor. Of prime concern is the Montlake interchange. The design as proposed under Alternative A significantly reduces mobility for bicyclists and pedestrians by presenting daunting and unsafe intersection crossings. We encourage the State to adopt a preferred alternative that includes an urban (human)-scale interchange that eliminates slip lanes from/onto SR 520. In addition, we strongly encourage the State to include a regional pedestrian and bicycle facility (designed to regional standard) that facilitates safe and efficient movement through the Montlake interchange and corridor.

C-026-003

Project Scale/ Built Footprint: The proposed alternatives present an expansion of the floating bridges and significantly larger interchanges and connecting infrastructure, as compared to the existing design. Under the Seattle City Council's direction, the SR 520 project should seek to minimize the impact especially in sensitive areas such as the arboretum. By reintroducing the Lake Washington ramps into the configuration and potentially adding a second bascule bridge over the Montlake Cut, the project footprint is much larger than it is today. We recommend the State adopt a

C-026-001

WSDOT recognizes cyclists as users of the Evergreen Point Bridge and as important participants in the public process for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. WSDOT will continue to engage cyclists in the public process of the project.

WSDOT received a number of comments in support of and in opposition to Options A, K, and L, as well as the related suboptions. These remarks are summarized in the Supplemental Draft Environmental Impact Statement Summary of Comments, available at

<http://www.wsdot.wa.gov/Projects/SR520Bridge/SDEIS.htm>. Since the SDEIS was published, FHWA and WSDOT have developed a Preferred Alternative that is similar to Option A, but incorporates design refinements that respond to both community and stakeholder reaction to the SDEIS. The modifications included in the Preferred Alternative are intended to reduce the environmental effects presented in the SDEIS while meeting the purpose and need for the project.

In early 2010, the Washington State Legislature passed and Governor Gregoire signed Engrossed Substitute Senate Bill (ESSB) 6392, which directs WSDOT to work collaboratively with the City of Seattle and other regional agencies to refine components of the Preferred Alternative, including design refinements and transit connections. The ESSB 6392 process involved the City of Seattle Pedestrian Advisory Board and Seattle Bicycle Advisory Board to develop design refinements for bicycle and pedestrian facilities. The resulting design refinements are described in the ESSB 6392: Design Refinements and Transit Connections Workgroup Recommendations Report (Attachment 16 to the Final EIS). The ESSB 6392 workgroup process has assisted with refinement of the Preferred Alternative design evaluated in the Final EIS, and the workgroup recommendations will continue to shape the project as further project development occurs.

- C-026-003** preferred alternative that scales back the built footprint of the project in order to reduce the impact on surrounding neighborhoods the environment.
- C-026-004** Environmental Impact: The proposed alternatives as designed present significant environmental impacts – both in habitat loss and degradation to air and water quality. In addition to this, the projected traffic volumes through the project corridor fail to support the State’s climate obligations. We encourage the State to adopt an alternative that not only seeks to mitigate these environmental impacts, but also significantly reduces them through a context sensitive design.
- C-026-005** Transit Access/Integration: A critical oversight in all the proposed SR 520 alternatives is the lack of direct connections between light rail and bus service. With an additional 70,000 daily riders projected on the U-link by 2030, there is a need for better integration between these high-demand transit services (as echoed in HB 3096). In addition to this, the removal of the Montlake Flyer stop further reduces transit accessibility in the proposed alternatives. The adopted alternative should optimize transit connections and opportunities, by providing direct connections and transfers between light rail, bus, and nonmotorized infrastructure and service, while supporting transit priority through key corridors.
- C-026-006** We also encourage the State to evaluate additional transit priority opportunities beyond the scope of the project that may reduce the need for current features of the proposed design, such as a second bascule bridge over the Montlake Cut. One project that should be included in this evaluation is the provision of BAT lanes on 23rd Ave.
- C-026-007** The adopted SR 520 Bridge design should be configured to allow for a feasible conversion to provide light rail service when appropriate. Given the massive construction effort required to replace the SR 520 Bridge, provisions should be made now to ensure that this does not become impracticable at a later date. We recommend the State consider current research regarding light rail feasibility through the corridor and ultimately adopt a preferred alternative that is configured to support high occupancy transit.
- C-026-008** Finally, we strongly encourage the State to review and consider the additional SR 520 alternatives that have been analyzed by the City of Seattle (Nelson Nygaard) prior to selecting a preferred alternative.
We appreciate your attention to our concerns and recommendations. The replacement of the SR 520 Bridge and connecting infrastructure is one of the most significant transportation projects of our time, and we strongly encourage your consideration of the key issues raised by the various stakeholders.

Sincerely,

Tessa Greegor
Principal Planner
Cascade Bicycle Club

C-026-002

The Preferred Alternative includes a revised and expanded Montlake lid, nearly 1,400 feet in length. Design refinements would also improve bicycle and pedestrian connectivity and safety in the SR 520 corridor. With the Preferred Alternative, bicycle connections would be improved by addition of a regional trail across the floating bridge; a proposed undercrossing beneath SR 520 between the Washington Park Arboretum and East Montlake Park; and an undercrossing beneath Montlake Boulevard connecting the new regional trail to the Bill Dawson Trail. Please see Chapter 2 of the Final EIS for descriptions of the bicycle and pedestrian paths and connections that are part of the SR 520, I-5 to Medina project. Recommended improvements that would be under the jurisdiction of the City of Seattle include a connection between the regional trail on SR 520 and the new bascule bridge, which would include bicycle and pedestrian improvements along Montlake Boulevard. Please see Chapter 2 of the Final EIS for a description of the Preferred Alternative and Chapter 7 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for discussion of effects on nonmotorized travel. Please also see the ESSB 6392: Design Refinements and Transit Connections Workgroup Recommendations Report in Attachment 16 to the Final EIS.

C-026-003

WSDOT has reduced the footprint of the SR 520, I-5 to Medina project wherever possible while complying with safety and operational standards (please see Chapter 2 of the Final EIS). The width of the corridor enables the bridge to meet Federal Highway Administration safety standards and accommodates the addition of HOV lanes and improved transit infrastructure. Because of this, it is not possible for the project and its associated interchanges to remain within the existing SR 520 footprint.

The Preferred Alternative would reduce effects on the Washington Park

Arboretum by removing the existing Lake Washington Boulevard eastbound on-ramp and westbound off-ramp and the R.H. Thomson Expressway ramps. Access to Lake Washington Boulevard by westbound SR 520 traffic would be moved to a new intersection located on the Montlake Boulevard lid at 24th Avenue East.

C-026-004

WSDOT strives to deliver effective transportation solutions while minimizing effects on the community and natural environs as required by law. Once completed, the SR 520, I-5 to Medina project would improve mobility, access, neighborhood connectivity, air quality, and water quality in the project area. The environmental review process as guided by the National and State Environmental Policy Acts is a disclosure process intended to ensure that the consequences and benefits of a proposed project are fully considered and weighed with needs and purpose of transportation.

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

C-026-005

As part of the ESSB 6392 process, WSDOT coordinated with Sound Transit, King County Metro Transit, the City of Seattle, and the University of Washington during the refinement of the Preferred Alternative. This coordination ensures that the SR 520, I-5 to Medina project will not adversely affect transit, pedestrian, and nonmotorized facilities and

operations at the future Montlake Multimodal Center (currently known as the Montlake Triangle), nor will it preclude future transit facility and service improvements. The Preferred Alternative would improve transit reliability in this area by providing HOV lanes on Montlake Boulevard between SR 520 and the Montlake Triangle and direct access HOV ramps to and from the east.

The ESSB 6392 workgroup considered priority treatments for transit in the project area and the Montlake corridor. The workgroup process resulted in a number of recommendations for improving transit speed and reliability between East Roanoke Street and the Montlake Multimodal Center. Furthermore, since the SDEIS was published, WSDOT has evaluated transit signal priority within the Montlake interchange area, in collaboration with the City of Seattle, King County Metro Transit, and Sound Transit. New traffic signal controller equipment would be compatible with transit signal priority equipment where it is currently provided:

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

Existing transit queue jump lanes on NE 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 NE southbound at East Shelby Street
- Montlake Boulevard NE/HOV Direct Access road
- NE 24th/HOV Direct Access road

Modifications for the Preferred Alternative also include changes to the Montlake Boulevard interchange and lid to better accommodate transit.

Bus stops on the lid would accommodate both eastbound and westbound buses, replacing the current Montlake Freeway Transit Station stops for buses traveling between the University District and the Eastside. University Link light-rail service is expected to be operational in 2016 and would accommodate some of the trips that now use these stops. Please see Chapter 8 of the Final Transportation Discipline Report for a discussion of which transit facilities are included in the Preferred Alternative as a result of the coordination efforts, and an updated evaluation of the effect of removing the Montlake Freeway Transit Station. The evaluation includes a discussion of changes to transit facilities and rider connections/transfers within the Montlake area. For additional information about the changes to nonmotorized facilities and connectivity, please see Chapter 7 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS). WSDOT is also coordinating with transit agencies to evaluate the potential for allowing all SR 520 buses to exit to the Montlake lid during the off-peak hours to provide a higher level of transit service in the vicinity.

C-026-006

The ESSB 6392 workgroup considered priority treatments for transit between East Roanoke Street and the future Montlake Multimodal Center, including along the 23rd Avenue corridor. Additional transit priority treatments beyond those included with the SR 520, I-5 to Medina project could be implemented by the City of Seattle and King County Metro Transit. Please see the ESSB 6392: Design Refinements and Transit Connections Workgroup Recommendations Report (Attachment 16 to the Final EIS) for more information.

C-026-007

WSDOT has coordinated with Sound Transit on compatibility with

potential future light-rail infrastructure. In comparison to the design options presented in the SDEIS, the Preferred Alternative would have enhanced compatibility with potential future light rail, which could be accommodated either by converting the HOV lanes for rail use or by adding light-rail only lanes. Because rail transit in the SR 520 corridor is not programmed in current regional transit plans, the responsible agency would need to undergo an extensive planning and environmental review process prior to implementation of any future project to add rail in the corridor.

C-026-008

Please see the response to comment C-026-001 for information on WSDOT's coordination with City of Seattle and other stakeholders to refine the Preferred Alternative. Design refinements in the Preferred Alternative to allow for future light-rail infrastructure include a wider gap between the eastbound and westbound structures in the west approach area. The Preferred Alternative would also include a managed shoulder on the Portage Bay Bridge, rather than an auxiliary lane to reduce the width in this area in comparison to Option A.