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April 15, 2010

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

Dear Ms. Young:

L-005-001

The King County Department of Transportation (KCDOT) is pleased to submit comments on the State Route 520, I-5 to Medina Bridge Replacement and High Occupancy Vehicle (HOV) Project Supplemental Draft Environmental Impact Statement (SDEIS). As a cooperating agency, we have provided comments on the internal SDEIS draft as well as each of the discipline reports, and appreciate that the majority of our previous comments have been adequately addressed in this document.

Currently, King County Metro Transit and Sound Transit carry over 14,000 people a day traveling on SR 520 and an additional 7,000 riders on Montlake Boulevard daily. In addition, bus service will be added to this corridor as part of the SR 520 Urban Partnership. Funding generated by the one-cent per one-thousand dollars assessed value property tax increase, approved by the King County Council, will implement 28,000 new service hours and the Sound Transit 2 (ST2) plan will fund an additional 20,000 new service hours; a total 20 percent increase in transit service in this corridor.

Regardless of mode, improving mobility for people and goods across Lake Washington remains a major purpose of this project, along with improving safety and reliability in the corridor. The preferred alternative should include elements that support transit operations in the SR 520 corridor and on Montlake Boulevard by minimizing travel times and maximizing reliability for both local and cross-lake transit service. Our highest priority interests are summarized below.

Light Rail and Bus Rapid Transit:
In the near term, bus service will be the primary mode of transit across SR 520, with the potential for light rail across the bridge in the future. The Washington State Legislature passed legislation for a design of the SR 520 Bridge that includes four general purpose lanes and two HOV lanes that accommodate high capacity transit, supporting a bus rapid transit system with the potential for future light rail. The current design of the SR 520 Bridge Replacement and HOV Project

L-005-001

In early 2010, the Washington State Legislature passed and Governor Gregoire signed Engrossed Substitute Senate Bill (ESSB) 6392. Through the ESSB 6392 process, WSDOT has worked collaboratively with the City of Seattle, King County Metro Transit, and Sound Transit as part of the design refinements and transit connection workgroup during the remainder of 2010. Through this process, WSDOT also reviewed the Preferred Alternative design for compatibility with future light rail and made adjustments to allow for connectivity between SR 520 and potential station locations near Montlake Boulevard.

WSDOT evaluated HOV lane operations in the transportation analysis and found that the corridor improvements, including continuous HOV lanes, would substantially reduce the amount of congestion experienced by buses and carpools that travel across Lake Washington on SR 520. The HOV lanes will reduce average travel times for buses and minimize congestion related travel time variability that would persist in the no-build alternative. Operations results for the HOV lanes are based on assumed minimum HOV occupancy of 3 persons. This requirement was established as policy by the Legislature through ESSB 6392, in addition to a requirement that the Legislature must be informed when HOV speeds drop below 45 miles per hour more than 10 percent of the time.

L-005-001 includes elements that support bus services, including completing the HOV lane system through the corridor and providing direct access ramps. The regional transportation plan, Transportation 2040, developed by the Puget Sound Regional Council, identifies SR 520 as a busway for regional express service. Voter approval of the ST2 plan in 2008 supports additional express bus service investments in the corridor and the study of light rail on SR 520, in addition to the construction of light rail on the Interstate 90 Bridge.

Additionally, the SR 520 High Capacity Transit (HCT) plan, developed by the Washington State Department of Transportation (WSDOT), the University of Washington, Sound Transit, and King County Metro Transit, calls for bus rapid transit on the SR 520 corridor beginning in 2016. The HCT plan includes five bus rapid transit lines with fast, frequent, reliable transit service including transit priority treatments and high quality passenger facilities. This increase in the corridor's transit service and capital investments exceeds current available transit funding. The service improvements on SR 520 from King County's property tax, ST2, and the WSDOT capital improvements in transit facilities, are an initial investment toward bus rapid transit in the corridor.

For the near term, buses will be the primary mode of transit on SR 520. The bridge design needs to include bus transit supportive features to assure effective transit operations. That said, design elements that facilitate future conversion to light rail across SR 520 should be considered. Improvements to accommodate light rail will need to be weighed against their effect on current transit operations and cost. The evaluation should include possible light rail impacts on bus operations in the corridor and identifying the potential facilities necessary to provide reliable connections between light rail and buses.

Montlake Corridor:

L-005-002 Montlake Boulevard is a crucial transit corridor with over 590 local and regional transit trips daily, connecting riders between the University District and other Seattle neighborhoods and Eastside communities. All SR 520 alternatives should maintain operating efficiency of regional and local transit operations on Montlake Boulevard by including measures that prevent increased travel times for over 12,000 regional and local transit riders in this corridor daily. Maintaining transit reliability in this corridor can best be achieved with a plan that considers the following elements:

- *A westbound auxiliary lane on the Portage Bay Bridge*: This would prevent delay on Montlake Boulevard as a result of SR 520 westbound on-ramp congestion.
- *HOV and transit priority treatments on 23rd Avenue and Montlake Boulevard*: Inclusion of transit lanes, transit signal priority, and queue jumps all could help keep local and cross-lake transit moving through the Montlake corridor.
- *Multiple access points for SR 520*: In order to manage the traffic on Montlake Boulevard, a major local and regional transit corridor, WSDOT should include multiple access points to and from SR 520 and a traffic management plan for the westside of Lake Washington as explained in our attached comments.

L-005-002

The Preferred Alternative has replaced the auxiliary lane with a managed shoulder, which would operate during the peak periods. The managed shoulder is needed to address congestion associated with the volume of vehicles entering from the Montlake interchange as well as those vehicles exiting to I-5, but reduces the footprint of the Portage Bay Bridge compared to Option A. It would also improve operations on both the SR 520 westbound mainline and on Montlake Boulevard compared to the No Build Alternative. New traffic signal controller equipment will be compatible with transit signal priority equipment and is planned for the NE Pacific Street/Montlake Boulevard NE intersection (including the HOV queue jump lane) and Montlake Boulevard NE northbound at East Shelby Street. Traffic signal controller equipment will also be compatible with transit signal priority equipment at Montlake Boulevard NE southbound at East Shelby Street; Montlake Boulevard NE/HOV Direct Access road; and the NE 24th/HOV Direct Access road. Although Montlake Boulevard is expected to be the primary access to and from SR 520 in the Montlake area, features included with the new Montlake Interchange, such as HOV lanes, would improve circulation and congestion. The Preferred Alternative would remove the existing Lake Washington Boulevard eastbound on-ramp and westbound off-ramp and the R.H. Thomson Expressway ramps. Westbound SR 520 traffic would be able to access Lake Washington Boulevard via a new intersection located on the Montlake Boulevard lid at 24th Avenue East.

Please see Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for more information on transit facilities provided with the Preferred Alternative.

L-005-002 If any of these elements are not included, increased emphasis on other transit supportive measures is critical to maintain transit speed and reliability in this corridor.

Direct Access HOV Ramps at Montlake Boulevard:

L-005-003 Direct Access HOV ramps connecting Montlake Boulevard and SR 520 are a critical component of the design. These ramps would improve the speed and reliability of transit connections between Eastside communities and the University District for bus riders on SR 520 cross-lake services. Without the ramps, buses would need to weave through general purpose traffic from the SR 520 HOV lanes to exit and enter Montlake Boulevard. These movements would not only negatively impact transit, but also obstruct general purpose traffic.

Montlake Triangle:

L-005-004 Under each of the SR 520 alternatives, the Montlake Triangle is a crucial multimodal connection point. Traffic operations around the Montlake Triangle are critical because all modes of travel, including bicyclists, pedestrians, vehicles, and buses, converge at this point when traveling on Montlake Boulevard. With the loss of the Montlake Freeway Station, more buses, pedestrians, and cyclists will move through the Montlake Triangle to make connections to buses, light rail, and the University of Washington. The SR 520 project should include investments in the triangle to facilitate enhanced connections between transit and other modes of travel, improve the waiting environment for passengers, and provide safe and direct pedestrian connections between transit and the University of Washington health facilities and the main campus.

Loss of the Montlake Freeway Station:

L-005-005 The removal of the Montlake Freeway Station will result in the loss of access to 355 daily bus trips for walkers, cyclists, and local bus riders. To preserve this critical transit connection, additional direct service between Eastside communities and the University District is needed, especially in the non-peak period. The cost of service to mitigate the loss of the Montlake Freeway Station is $3 to $5 million annually, which remains unfunded. This funding is needed in addition to revenues that will be generated by the one-cent per one-thousand dollars assessed value property tax increase the King County Council approved to implement SR 520 Urban Partnership service in 2010.

Part of the function of the Montlake Freeway Station can be replaced by enhancing the Eastside's Evergreen Point Freeway Station on SR 520, which is part of the SR 520 Eastside Transit and HOV Project. The KCDOT and the WSDOT continue to work together to ensure this station is designed to accommodate the expected increase in transfer activity due to the closure of the Montlake Freeway Station.

Mitigation:

L-005-006 The Final Supplemental Environmental Impact Statement (FSEIS) should clearly state WSDOT's commitment to mitigate the effect of construction on transit operations, trolley infrastructure, and the impacts of increased transit demand and operating costs resulting from construction activities and system reconfiguration. The KCDOT is interested in working with WSDOT to determine the

L-005-003

The Preferred Alternative includes new transit/HOV direct access ramps that connect to 24th Avenue East providing access to Lake Washington Boulevard; northbound Montlake Boulevard; and HOV lanes on Montlake Boulevard between the Montlake Bridge and the SR 520 westbound ramps/Montlake Boulevard NE intersection.

Please see Chapters 6 and 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for a detailed description of lane configuration changes in the Montlake area with the Preferred Alternative.

L-005-004

WSDOT has collaborated with the University of Washington, City of Seattle, King County Metro Transit, and Sound Transit, as part of the design refinements and transit connections workgroup required by ESSB 6392, to determine how to improve transit speed and reliability between the SR 520, I-5 to Medina project and the Montlake Multimodal Center. The workgroup evaluated the transit connections at the Montlake interchange, identified preferred bus stop locations, and made specific design recommendations to ensure an adequate base level of midday service between the University of Washington, Montlake, and the Eastside, following closure of the Montlake Freeway Transit Station. The Preferred Alternative includes the recommendations accepted by FHWA, the Governor, and Legislature. Please see Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for more information.

L-005-005

The Preferred Alternative would remove the Montlake Freeway Transit Station and add new bus stops on the Montlake lid. WSDOT will continue to coordinate with King County Metro Transit and Sound Transit to address their needs for transit operations.

L-005-006

impacts and appropriate service additions needed to maintain the movement of people and goods in the corridor for inclusion in the preferred alternative.

The KCDOT will continue to be an active partner in the SR 520 Project as it moves forward, participating in work groups as identified in the approved Senate Bill 6392 to assess SR 520 design modifications, transit connections, and to identify a plan for financing high capacity transit in the corridor.

We hope these comments prove helpful as the FSEIS is finalized. We have attached additional technical comments regarding specific sections of the SDEIS for your consideration. We look forward to continuing to work with WSDOT to refine the project's design and improve its utility for optimizing regional mobility, especially the speed and reliability of public transportation.

Sincerely,

Harold S. Taniguchi, Director
King County Department of Transportation

Attachments

cc: Chris Arkills, Transportation Policy Advisor, Office of Executive Dow Constantine
Laurie Brown, Deputy Director, King County Department of Transportation (KCDOT)
Ron Posthuma, Assistant Director, KCDOT
Kevin Desmond, General Manager, Metro Transit Division, KCDOT

Access to SR 520 bus service in the Montlake interchange area would be reduced during the off-peak period, since transit riders would be required to use bus service that operates directly between the Eastside and the University District, and light rail between the Montlake Triangle and downtown Seattle, or use local buses. Updated information regarding the effects of removing the Montlake Freeway Transit Station is provided in Chapter 8 of the Final Transportation Discipline Report.

L-005-006

WSDOT has coordinated with local transit agencies throughout the SR 520, I-5 to Medina project planning process. During construction, WSDOT will continue to coordinate closely with these agencies to manage the project's effects on transit and maintain the best possible service for riders. The Final Transportation Discipline Report (Attachment 7 to the Final EIS) provides additional details and updates to anticipated construction and operation effects on transit with the Preferred Alternative. Please see Chapter 10 of the report and Section 6.1 of the Final EIS for a discussion of how WSDOT will minimize negative effects on transit during construction.

SR 520, I-5 to Medina Bridge Replacement and HOV Project
King County Department of Transportation's Comments on Supplemental Draft EIS

The following comments address suggested corrections and other remaining unresolved issues intended to make the document easier to understand and more useful as a decision-making tool.

L-005-007 | 1. p. 2-17: On Exhibit 2-9, Option L cross-section 3 does not but should show the bike path.

L-005-008 | 2. p. 2-19: A graphic comparable to Exhibit 2-10 needs to show the Option A suboptions.

L-005-009 | 3. p. 2-27: The description of the Option A suboptions needs to mention that the eastbound direct-access ramp would eliminate the weave for eastbound buses, as this is important for function and safety.

L-005-010 | 4. p. 2-19: Exhibit 2-16 appears to illustrate that the added eastbound direct-access ramp (in Option A) would pass under Montlake Boulevard.

L-005-011 | 5. p. 2-34: *2.4 Could the project be built in phases?* Given that only floating bridge construction has been funded to date and the project suffers from a $2.36 billion funding gap, the phased implementation scenario appears to be as or more likely than construction of the complete project for the foreseeable future. As a result, the FSEIS should provide a more detailed analysis of phased construction and associated impacts following selection of the preferred alternative.

L-005-012 | 6. p. 2-39: Exhibit 2-22 provides important information (see comment regarding page 5-153) but the map scale needs to be larger than 1"= 400' with appropriate labels in order to be legible.

L-005-013 | 7. p. 4-5: Text correctly references 2009 transit ridership data but there is a typo on the source citation listing "2007".

L-005-014 | 8. p. 4-6: Exhibit 4.1-4 should show trolley wire. (King County can provide this data layer.)

L-005-015 | 9. p. 4-6: Exhibit 4.1-5 shows that eastbound boarding's at the Montlake Freeway Station are high in both peaks. This demonstrates the importance of riders wanting to board buses in the University District to go to the eastside. It also explains why the eastbound direct access ramp as part of Sub-option A and the transit pathway from the Montlake Triangle to SR 520 are important.

L-005-016 | 10. p. 4-8: Is the Evergreen Point Station within the study area of this project? If it indeed is included in the study area, then it should also be mentioned as a second freeway station on page 4-5.

L-005-007

The bicycle/pedestrian lane is included in this cross-section, but was not labeled as such. This has been corrected in Exhibit 2-15 of the Final EIS.

L-005-008

The Preferred Alternative combines elements of Option A and its suboptions, and includes additional design refinements in the Montlake and west approach areas. Chapter 2 of the Final EIS depicts the Preferred Alternative from a similar vantage point as SDEIS Exhibit 2-10.

L-005-009

Please see Section 5.1 of the SDEIS for the information requested in this comment.

L-005-010

The eastbound direct access HOV ramp would connect the center (HOV) lanes of Montlake Boulevard with SR 520 east of the Montlake interchange. The ramp would pass under the northbound lanes of Montlake Boulevard and descend to the elevation of the SR 520 roadway. Please see Chapter 2 of the Final EIS for a depiction of this direct access HOV ramp.

L-005-011

The SDEIS discussed the possibility of constructing the project in separate phases over time, with the vulnerable structures (the Evergreen Point floating bridge, west approach bridge, and Portage Bay bridge) built first. This "Phased Implementation scenario" was analyzed for each environmental resource. As discussed in Section 2.8 of this Final EIS, due to the funding shortfall, FHWA and WSDOT still believe it is prudent to evaluate the possibility of phased construction of the corridor should full project funding not be available by 2012. Currently committed funding is sufficient to construct the Evergreen Point floating bridge and landings;

L-005-017 | 11. p. 4-9: Exhibit 4.1-7 needs to show the bus stop on the west side of Montlake Boulevard by the east-bound onramp as shown in Exhibit 4.1-4.

L-005-018 | 12. p. 4-25: King County Wastewater Treatment Division's sewers run parallel with Montlake Boulevard, on the west side, and are of brick construction. No construction activity will be allowed over or immediately adjacent to these facilities. These pipelines must remain in service at all times and cannot be re-routed or relocated.

L-005-019 | 13. Chapter 5: Option A with the sub-options needs to be fully represented and analyzed throughout the FSEIS, especially in the *Project Operation and Permanent Effects* chapter where the relative impacts and benefits of the sub-options should be better quantified. For example, inclusion of the replacement Lake Washington Boulevard ramps in Option A would significantly reduce traffic congestion on Montlake Boulevard and thus improve transit reliability, decreasing travel times for transit and general purpose traffic by almost 50%. Replacement of the Lake Washington Boulevard ramps would result in similar levels of traffic through the Arboretum as in the No Build Option, which assumes existing Lake Washington Boulevard ramp configurations.

L-005-020 | 14. p. 5-1: The first sentence of the transportation analysis reads "The first step in analyzing traffic is to determine how much traffic is predicted to grow in the region." Is the transportation analysis about measuring traffic, i.e. cars or about travel, i.e. people throughput?

L-005-021 | 15. p. 5-3 The description of RapidRide (under *King County Metro's Transit Now*) should be broadened. The Bellevue-Redmond RapidRide B-Line provides connections between Downtown Bellevue and Downtown Redmond, via NE 8th Street, 156th Avenue NE, and 148th Avenue NE, including intermediate destinations of Crossroads and Overlake.

L-005-022 | 16. p. 5-4: The information on pedestrian connections at the Montlake Triangle should be updated according to the University of Washington's Rainier Vista plan, which is anticipated to start construction in 2011. The Rainier Vista project and its final design should be considered as the baseline condition for the Montlake Triangle since construction is expected to be completed in 2012.

L-005-023 | 17. p. 5-6: Under all options, traffic volumes will still exceed capacity, even after full build out. The Final SEIS should indicate the need for more aggressive TDM activities and additional transit services to be implemented to further help manage the excess demand over the long term.

L-005-024 | 18. p. 5-10: The preferred alternative needs to include a westbound auxiliary lane at Portage Bay, on and off ramps to and from Lake Washington Boulevard and transit priority or other elements that will reduce traffic congestion impacting key intersections.

L-005-025 | 19. p. 5-19: *How would the project affect transit facilities and service?* This section should also discuss the transit facilities included with the A sub-options (Option A+),

a Request for Proposals has been issued for this portion of the project, with proposals due in June 2011. Accordingly, this Final EIS discusses the potential for the floating bridge and landings to be built as the first phase of the SR 520, I-5 to Medina project. This differs from the SDEIS Phased Implementation scenario, which included the west approach and the Portage Bay bridge in the first construction phase.
Sections 5.15 and 6.16 of the Final EIS describe effects associated with this revised potential phasing. The project phasing evaluated in the Final EIS would result in a delay in many of the effects and benefits of the project on Seattle parks, neighborhoods, and wetlands. Mitigation measures would be undertaken concurrently with the portion of the project causing the impact.

L-005-012

This exhibit described the transition areas for the Phased Implementation Scenario that was considered in the SDEIS. Please see the response to comment L-005-011 regarding the Phased Implementation scenario. Exhibit 2-29 of the Final EIS provides updated information on the Final EIS construction phase 1 transition area. With revised potential phasing, the only transition area would be the in the west approach, east of Foster Island. The Montlake interchange area and I-5 area would not include interim structures. The scale of this exhibit is consistent with similar exhibits in the EIS. Details of the interim connection in the west approach area would be provided during final design.

L-005-013

The Final EIS correctly reflects the source citation listing for the 2009 transit ridership data (King County Metro 2009).

L-005-014

L-005-025 which includes an HOV/transit direct access ramp in the eastbound direction, in addition to the westbound transit-only off ramp at Montlake Boulevard included in Option A.

L-005-026 20. p. 5-21: *Option A Suboptions*: This discussion should quantify the significant savings in transit travel times that would result from the Lake Washington Boulevard ramps and the transit direct access ramp.

L-005-027 21. p. 5-23: The analysis of transit performance should quantify impacts to address the number of impacted routes, riders, trips and amount of additional service hours to mitigate these impacts. At a minimum, the parameters addressed in Exhibit 4.1-5 should serve as the basis of this analysis.

L-005-028 22. p. 5-24: *University District Service*: This section notes that King County Metro routes 261 and 271 will not longer be accessible from Evergreen Point Freeway Station. This section should include language that Metro will be evaluating routing options related to these routes serving Evergreen Point Freeway Station. Metro will be considering routing options to allow both these routes to serve the Evergreen Point Freeway Station.

L-005-029 23. p. 5-26: How would westbound bus riders cross Montlake Boulevard to transfer to southbound local bus service? A map or diagram is needed to clarify the description of these circulation patterns.

L-005-030 24. p. 5-27: *Bikes and Transit* section – The document does not mention the permanent removal of existing bicycle parking facilities (bike racks and lockers) at the Montlake/SR 520 intersection.

25. p. 5-28: Discussion of the Montlake Multimodal Station should include a specific reference to bicycle parking. We suggest that accommodations to replace the 54 bike locker spaces and 53 bike rack spaces that will be lost at the Montlake Freeway stop be made at the Montlake Triangle. King County also urges WSDOT to work with University of Washington and Sound Transit to coordinate a full-service bike station facility at or near the Montlake Triangle (although this could also be located at or in the vicinity of University of Washington Link Light Rail Station). This has been proposed by UW staff and by members of Sound Transit's Bicycle Advisory Group. The existing Montlake Freeway Stop bike parking area was initially expected to be a bike station, but lack of resources and WSDOT regulations on that property eliminated that concept from consideration.

L-005-031 26. p. 5-28: An appropriately-scaled map or diagram is needed to illustrate bike connections between the SR 520 trail and the Montlake Triangle.

L-005-032 27. p. 5-30: *Effects of Suboptions*: The first bullet should clarify that the traffic volumes applies to the Arboretum and provide more explanation of this issue. This is a significant issue considering the controversy surrounding the Lake Washington Boulevard ramps. (At the February 23 SDEIS hearing, citizens who voiced opposition to

Please see Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the EIS) for an updated version of SDEIS Exhibit 4.1-4.

L-005-015

All SDEIS options maintain connections from the Montlake area to the Eastside, as does the Preferred Alternative. The Preferred Alternative includes a new bus stop on the Montlake lid to accommodate bus connections in the Montlake interchange area, as well as a transit/HOV direct-access ramp from the lid to eastbound SR 520. Please see Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for a full description of effects on transit facilities and services with the Preferred Alternative.

L-005-016

The Evergreen Point Freeway Station is a part of a different project, the SR 520, Medina to SR 202: Eastside Transit and HOV Project. The station is discussed in the environmental documents for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project, because it plays an integral role in allowing transit riders to transfer between SR 520 bus routes.

L-005-017

Please see Chapter 7 of the Final Transportation Discipline Report (Attachment 7 to the EIS) for an updated version of SDEIS Exhibit 4.1-7.

L-005-018

WSDOT will continue to coordinate with King County throughout final design and construction of the SR 520, I-5 to Medina project and other projects in the SR 520 corridor. For updated information on public services and utilities in the project vicinity, please see the Social Elements Discipline Report Addendum (Attachment 7 to the Final EIS).

L-005-032 these ramps had also voiced support for transit. If citizens understood the benefit that these ramps would have on transit, there might be more acceptances of these ramps.

L-005-033 28. p. 5-31: The FSEIS should evaluate a comprehensive traffic management plan comprised of potential strategies intended to reduce arboretum traffic without significantly affecting transit performance, especially during peak ridership times. Examples of such strategies that have been suggested include closure of the Lake Washington Boulevard ramps during certain time periods, limiting their use to peak commute hours, or limiting their use to High Occupancy Vehicles; traffic calming; police emphasis patrols; and transportation demand management strategies including tolling, minimum vehicle occupancy requirements at certain times of day, and street closures for special events. The FSEIS, should also evaluate the relative impacts and benefits of alternatives to the Lake Washington Boulevard ramps that enhance transit such as additional transit priority treatments on Montlake Boulevard. The FSEIS needs to clarify the performance of such approaches relative to community concerns and project goals.

L-005-034 29. p. 5-32: *Transit*: King County Metro will continue to work with WSDOT to identify appropriate measures to mitigate impacts to transit facilities and service.

L-005-035 30. p. 5-153: A map or diagram similar to Exhibit 2-22 but in a legible scale is needed to illustrate how and where the 6-lane section tapers into the 4-lane section of the SR 520 mainline as well as show how the regional bicycle/pedestrian path on the new pontoons would connect to comparable facilities on the west side of the lake.

31. p 5-154: The analysis of the Phased Implementation Scenario needs to address impacts to cross-lake pedestrian and bicycle travel.

32. p. 5-155 Traffic performance under the Phased Implementation Scenario should be illustrated by diagrams like Exhibits 5.1-7 and 5.1-9.

L-005-036 33. p. 5-155 Does the "Persons per Hour" in Table 5.15-3 include transit passengers?

L-005-037 34. p. 5-158: Discussion of Phased Implementation states that traffic operations would be similar to the No Build Alternative. Under this scenario, the need for aggressive and effective TDM to manage demand may be more severe, as travel times for both transit and general purpose travel would be negatively affected. The Final SEIS should address additional TDM mitigation for long term operations if Phased Implementation is pursued.

L-005-038 35. p. 5-167: Table 5.16-1 *Summary Comparison of Operation Effects of the 6-Lane Alternative Options / Montlake Freeway Station*: This description of the impact of the loss of the station should address that the function of the station will be replaced by an eastside transit station at Evergreen Point, designed to accommodate increased passenger transfer activity. Additionally, the description should note that replacement of the function of the station also requires additional transit service, estimated at $3-5 million annually, to provide more direct service between UW and Eastside communities.

L-005-019

Effects on transportation from Option A with suboptions were discussed in detail in the SDEIS Transportation Discipline Report. 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 community and stakeholder reaction to the SDEIS. The Preferred Alternative does not include replacing the Lake Washington Boulevard ramps. Please see the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for a discussion of the effects of the Preferred Alternative on traffic volumes, traffic congestion, and general-purpose travel times on Montlake Boulevard and Lake Washington Boulevard. Chapter 8 of the Final Transportation Discipline Report also discusses the effects of the Preferred Alternative on transit facilities, services, and travel times in the Montlake interchange area.

L-005-020

The transportation analysis evaluates vehicle and person throughput, travel times, speeds, and congestion, and includes a number of measures of effectiveness. Please see Chapter 4 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for a description of these measures.

L-005-021

Comment acknowledged. A revised RapidRide description has been included in Section 5.1 of the Final EIS.

L-005-022

As part of the ESSB 6392 workgroup process, WSDOT developed design refinements for the Preferred Alternative in coordination with the University of Washington, King County Metro Transit, Sound Transit, and the City of Seattle. The University of Washington's Rainier Vista plan, Sound Transit's pedestrian bridge, and improvements to the transfer

L-005-039 36. p. 6-10: *Montlake Freeway Station*: Further clarity on rider connections once the Montlake Freeway Station is removed. Sound Transit UW Link is not scheduled for operation until 2016. In the interim, riders who currently use the Montlake Freeway Transit Station to access buses to downtown Seattle will either be using local buses on Montlake Blvd. to reach downtown via Capitol Hill or they will need to access downtown-bound buses at Campus Parkway by either walking or transferring from local service on Montlake Boulevard.

L-005-040 37. p. 6-11: As Metro has shared in previous comments on the SDEIS and several discipline reports; Metro is not considering operation of a shuttle service between Evergreen Point Freeway station and the transit stop at 92nd Ave NE. Metro is open to further discussion with WSDOT and Sound Transit of possible measures to mitigate the impacts to riders when only one eastside transit station is necessary.

L-005-041 38. p. 6-11: Mitigations for the impacts summarized under each subheading need to be addressed under *How can the project minimize negative effects on transportation during construction?* Beginning on page 6-15.

L-005-042 39. p. 6-15 (see page 5-32/ transit subsection also): Discussion of potential methods to minimize negative effects on transportation should also include further discussion on mitigation funding by WSDOT to offset the impacts anticipated to transit operations and facilities. Metro and Sound Transit will continue to work diligently with WSDOT to identify construction impacts and provide cost estimates related to the impacts on transit operations and facilities and WSDOT needs to commit the necessary funds.

L-005-043 40. p. 6-15: Impacts to transit facilities, including temporary and permanent bus stop closures, temporary loss of transit priority lanes, and impacts to existing transit layover and electric trolley bus overhead wire, are adequately described earlier in this chapter. However, more specificity is desirable in the discussion of TMP measures dealing with the approach to working with affected agencies in mitigating these impacts, i.e. *"Measures to minimize effects on transit operations and access to/from transit facilities (in coordination with transit service providers)"* seems insufficient.

L-005-044 41. p. 6-15: The description of the Traffic Management Plan (TMP) references a "Public outreach communication plan". This should include not only information regarding construction status and daily impacts, but should include information on transit service options and other TDM programs that are available. This campaign should be coordinated with affected jurisdictions, major employers, and employer networks.

L-005-045 42. p. 6-17: *Special Events*: Further clarification is needed regarding shuttle services and discounts for the transit shuttle. Are transit agencies expected to provide these services?

L-005-046 43. p. 6-17: We are pleased that the SDEIS includes a discussion of TDM activities, and agree that it can be effective to support existing TDM programs implemented by affected jurisdictions. However, local jurisdiction funding for these activities is largely

between the Montlake Triangle and Sound Transit's rail station were included as part of the project's background assumptions. WSDOT continues to work collaboratively with the University and Sound Transit in their planning for Rainier Vista land bridge and the University Link station. Please see Chapters 7 and 9 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for a description of pedestrian and transit connection improvements in the Montlake Triangle area. Also see the ESSB 6392: Design Refinements and Transit Connections Workgroup Recommendations Report (Attachment 16 to the Final EIS), which details the results of the ESSB 6392 workgroup process.

L-005-023

Transportation Demand Management (TDM) consists of ongoing programs, rather than constructed project elements. WSDOT supports planning and implementation of transportation demand management through its Public Transportation Division, which coordinates extensively with other transportation corridor projects and provides a variety of assistance to other organizations that implement transportation demand management programs throughout the region.

The new infrastructure provided by the SR 520, I-5 to Medina project will increase the effectiveness of SR 520 corridor operations programs such as transportation demand management. For example, the addition of HOV lanes will substantially improve travel times for transit and carpools; and a new regional bicycle/pedestrian path crossing Lake Washington on SR 520 will promote cycling as a transportation option. Please see the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for detailed information about how the Preferred Alternative would affect the movement of people along the SR 520 corridor.

L-005-024

WSDOT has designed the intersections and ramps in the SR

L-005-046 grant-funded and there is no assurance regarding the level these programs will be funded at the time of SR 520 construction activities. The Final SEIS should address funding support for ensuring the continuation/expansion of TDM information and incentive programs to effectively manage travel demand in the SR 520 corridor. In addition, the document should reference the existing commute management programs at major institutions, such as University of Washington, Children's Hospital, and Microsoft, in addition to those of local jurisdictions, as other programs that the project should coordinate with to maximum TDM effectiveness during construction. The Final SEIS should also assess the need for additional transit services as mitigation, and address cost and funding to support these services.

L-005-047 44. p. 6-18: The Final SEIS should discuss need for coordination with King County Metro, Sound Transit, the City of Seattle and the University of Washington to locate temporary bicycle parking when the Montlake freeway stop is closed. Until the cross-lake bike lane is open, the demand for bike parking is likely to remain at current levels. Plans for outreach need to include bicycle commuters that will be affected by construction activities. Specific route planning, bike parking or other assistance may also be required.

L-005-048 45. p. 6-113: Table 6.16-1 *Summary Comparison of Construction Effects of 6-Lane Alternative Options/ Transit Element*: This section should include additional information on the impacts of transit operations that are described in pages 6-10 to 6-11. In particular, a brief discussion of the impacts to the Montlake Triangle and electric trolley bus impacts should be included in this table.

L-005-049 p. 7-17: The Indirect and Cumulative Effects chapter should also include discussion on the impacts of construction on transit operations. The section touches on temporary changes to transit facilities, but does not discuss these expected effects further and does not discuss potential need for transit reroutes due to lane closures, road detours, etc.

520/Montlake Boulevard interchange area to accommodate and provide adequate levels of service for expected traffic volumes. While the Preferred Alternative does not include an auxiliary lane on the Portage Bay Bridge, it does include a managed shoulder, which would operate as a travel lane during peak periods. For more information on these design refinements, please see Chapter 2 of the Final EIS.

L-005-025

The Preferred Alternative includes HOV direct access ramps to and from the east that connect to the Montlake interchange area. The ramps would connect to the inside HOV lanes on the SR 520 corridor and could be used by both eastbound and westbound buses and carpools of three or more people traveling between the Montlake interchange and the Eastside. Please see Chapter 2 of the Final EIS for more information on HOV lane configuration with the Preferred Alternative.

L-005-026

The Preferred Alternative in the Final EIS does not include the Lake Washington Boulevard ramps, but would continue to provide connectivity in the vicinity of 24th Avenue East for westbound traffic exiting SR 520 toward neighborhoods to the south of SR 520. The Preferred Alternative would also include direct access ramps. Please see Chapter 6 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for a discussion of the effects of the Preferred Alternative on transit travel times in the Montlake interchange area.

L-005-027

Please see Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for descriptions and exhibits of transit service, rider connections, and travel times in the Montlake interchange area with the Preferred Alternative. This discussion includes an

assessment of transit vehicle operations and rider experience at the Montlake Triangle (the future Montlake Multimodal Center).

L-005-028
Please see Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for revised descriptions of Metro Routes 261 and 271.

L-005-029
Please see Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for descriptions and exhibits of transit rider connections in the Montlake interchange area with the Preferred Alternative.

L-005-030
WSDOT continues to coordinate with King County Metro and Sound Transit to determine the best way to replace the bicycle parking facilities at Montlake Freeway Transit Station. The possibility of relocating bicycle parking to the Montlake Triangle area and the potential for a full service bike station facility near the Montlake Triangle were among the options considered during the ESSB 6392 coordination process described in Chapter 1 of the Final EIS. Please see Chapter 7 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for additional information about the ongoing coordination process and Section 5.1 of the Final EIS and Chapter 7 of the SDEIS Transportation Discipline Report for a discussion on removal of bicycle lockers at the Montlake Freeway Transit Station.

L-005-031
Please see Chapter 7 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for a larger-scaled diagram of bicycle connections between SR 520 and the Montlake Triangle.

L-005-032

Please see Chapter 6 of the Final Transportation Discipline Report for descriptions and exhibits of the effects of the Preferred Alternative on traffic patterns in the Montlake interchange area. This discussion includes the effects of removing the Lake Washington Boulevard ramps and the resulting changes in traffic volumes through the Arboretum area.

L-005-033

As mandated by the ESSB 6392 process, WSDOT has collaborated with the Arboretum and Botanical Garden Committee, regulatory agencies, the University of Washington, and the City of Seattle to address several Arboretum concerns, including traffic management on Lake Washington Boulevard. This collaborative effort helped inform the project's design refinements and transit connection workgroup planning efforts. The recommendations resulting from this effort are summarized in the Design Refinements and Transit Connections Workgroup Recommendations Report (Attachment 16 to the Final EIS).

L-005-034

Comment noted.

L-005-035

Please see the responses to comments L-005-011 regarding the phased implementation scenario and L-005-012 regarding SDEIS Exhibit 2-22 and Final EIS Exhibit 2-29. Sections 5.15 and 6.16 of the Final EIS describe the effects associated with revised potential phasing. The new bicycle/pedestrian path along the floating bridge would be constructed at the same time as the bridge, and WSDOT will continue to work with City of Seattle and other jurisdictions to create interim bicycle connections if phased construction occurs. Details of the interim bicycle connection in the west approach area would be provided during final design.

L-005-036

The “Persons per Hour” category in SDEIS Exhibit 5.15-3 included transit passengers (person trips).

L-005-037

Please see the response to comment L-005-011 regarding the Phased Implementation Scenario. Section 5.15 and 6.16 of the Final EIS describe the transportation effects associated with revised potential phasing. The Final EIS Transportation analysis found that the operational effects of Construction Phase 1 would be similar to No Build. Transportation demand management is discussed in Section 6.1 of the Final EIS and the Final Transportation Discipline Report. WSDOT is developing a trip reduction plan for construction that will identify a range of transportation demand management strategies that could be expanded or implemented during construction to support the traffic management plan. The trip reduction plan will be broken-down according to major project elements to provide flexibility in the selection of strategies and timing of implementation. WSDOT will coordinate with the King County Department of Transportation and other stakeholders to receive input on the plan before it is finalized.

L-005-038

The referenced text is a summary of effects that were described in detail within Section 5.1 of the SDEIS, including information about the transfer function that would be served by the Evergreen Point Station. The same information is included in Chapter 5 of the Final EIS. The SR 520, Medina to SR 202 project will construct the improved Eastside transit stations. The Medina to SR 202 project included in the No Build assumptions for the I-5 to Medina project; therefore, the transit effects described are based on the presence of the improved Eastside transit stations. Chapter 8 of the Final Transportation Discipline Report contains an updated description of transit under the No build Alternative and the Preferred Alternative. It also contains a more detailed evaluation of how

riders would be affected based on estimated seat capacity, arrival frequencies, and total travel times.

L-005-039

Please see Chapter 8 of the SDEIS Transportation Discipline Report for details regarding the closure of the Montlake Freeway Transit Station. Please also see Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for an updated assessment of the effect of removing the Montlake Freeway Transit Station on transit service and rider travel times and connections.

L-005-040

The SDEIS indicated that shuttle service was a potential measure to accommodate riders during the construction closure of the Evergreen Point Transit Station, but did not indicate how the service would be operated. The SDEIS listed several potential strategies that could be used to mitigate for the effects on transit as a result of construction. Refinement of the construction plans and additional coordination was required to determine how the strategies would be implemented. WSDOT will continue to coordinate with the transit agencies, including King County Metro Transit, to manage the effects on transit during construction.

L-005-041

In addition to the discussion in Chapter 6 of the SDEIS, Chapter 10 of the SDEIS Transportation Discipline Report detailed several methods for avoiding and minimizing effects of the SR 520, I-5 to Medina project on transportation. Please see Chapter 10 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for updated information.

L-005-042

The Final EIS reports the anticipated beneficial and negative effects of the project and describes actions that will minimize adverse effects. Details of the agreements and funding plans needed to carry out these described actions will be developed and documented in direct coordination with the appropriate agencies.

L-005-043

The Final EIS contains mitigation measures for operational and construction effects expected with the Preferred Alternative. The level of detail is in accordance with the level of project design development analyzed, per NEPA and SEPA regulations, and is consistent with applicable federal, state, and local laws and regulations. In accordance with the requirements of ESSB 6392, WSDOT has worked collaboratively with the City of Seattle and its pedestrian and bicycle advisory boards, King County Metro Transit, and Sound Transit to develop design refinements and mitigation measures. Please see the ESSB 6392: Design Refinements and Transit Connections Workgroup Recommendations Report (Attachment 16 to the Final EIS) for more information.

WSDOT will continue to refine mitigation measures for the SR 520, I-5 to Medina project as design development progresses, as mandated by ESSB 6392 and all applicable federal, state, and local permitting requirements.

L-005-044

The public outreach communication plan will include information about construction conditions and transportation options, including transit. WSDOT, in coordination with affected entities, is also evaluating trip reduction strategies that could be implemented to manage traffic during construction. This plan will identify areas where trip reduction could be beneficial and will outline transportation demand management strategies

to be expanded or implemented during construction. WSDOT will develop a range of options for trip reduction and coordinate with affected agencies to develop plans for implementation.

L-005-045

Please see the response to comment L-005-040 for information regarding potential mitigation discussed in the SDEIS.

L-005-046

The project cost estimate includes funding for trip reduction strategies. In addition, WSDOT is developing a trip reduction plan that will identify transportation demand management strategies to be expanded or implemented during construction. WSDOT is coordinating with managers of various state and local jurisdiction transportation demand management programs, such as the Commute Trip Reduction program for large employers and the Growth and Transportation Efficiency Center, as well as other programs that support trip reduction for commuters.

L-005-047

Please see the responses to comment L-005-030 regarding bicycle parking in the Montlake area and comment L-005-043 regarding additional coordination.

L-005-048

Because SDEIS Exhibit 6.16-1 was intended to provide a broad summary of key points, the revision suggested by this comment was not made. Please see Section 6.1 of the SDEIS for a more detailed discussion of construction effects and Chapter 6 of the Final EIS for updated information.

L-005-049

Direct construction effects of transit were addressed in Section 6.1 of the SDEIS and are updated in Section 6.1 of the Final EIS. The findings regarding concurrent effects are also discussed in Chapter 10 of the Final Transportation Discipline Report. They indicate that timing of major construction activities on the nearby Sound Transit University Station and the SR 520, I-5 to Medina projects would not be concurrent. Therefore, substantial concurrent effects are not anticipated and were not reported in Final EIS Section 6.18. During project construction, WSDOT, King County Metro Transit, and Sound Transit will coordinate to manage effects to public transit service on regularly scheduled routes.