TO: Jenifer Young, WSDOT SDEIS Environmental, Mgr. SR 520 Program Office 4/15/10

RE: SR 520 SDEIS Comments and Concerns

From; Virginia Gunby, E-mail -vgunby@aol.com Phone 206-524-2731

On March 30 2010 the Governor signed into law the 2010 state 520 Legislation ESSB 6293 I-301-001 enabling of \$200 million work for the west-side, 3 Workgroup studies on the major issues listed below, and moved the date forward on-Variable Tolling to start to 2011. 1.)ESSB 6293 is the 2010 state Law help to refine the Preferred west-side SR 520Alternative Design in the SDEIS into the" Preferred Alternative" for the west-side design in the SR520 FEIS. In Section (4)b.i) it sets HOV performance standards with a minimum of 3person carpools in HOV lanes, and an average transit speed of 45 mph 90% of the time. Comment: If the operations of the 520 HOV lanes do not meet this standard there needs to be changes in Tolling fees and/or the number of people in HOVs. 2.) Requires "Mitigation to protect against adverse impacts on neighborhood I-301-002 environmental quality." | Comment: I assume that this is a directive to WSDOT, but no Workgroup was required for this to assure that the statement is followed. 3.) To accommodate effective connections for Transit, including HCT at the U of W Station I-301-003 a WSDOT Workgroup is to recommend "alternative connections for transit", including HCT to the U of W LRT Station, and a report by 7/5/10. Comment: The "A :SR 520 design option plan includes bus on and off ramps to and from the east-side on Montlake Blvd. We requested that city of Seattle connecting arterials have new transit preferential lanes, and transit control of keeping the traffic light green at the Montlake Blvd.NE/NE Pacific St. Intersection. These actions improve transit service movement between SR 520 and the Triangle Bus transfer-point/LRT station. 4.) Provides \$200 million in excess bond proceeds, beyond the funds needed for the I-301-004 bridge segment, to fund SR 520 from I-5 to Medina, and Comment: Is this real money for the west-side project? 5.) Creates a WSDOT Workgroup to recommend options for financing HCT. - Report on I-301-005 520 is due 1/1/11, Comment: 1.) State gas tax and vehicle license fees are dedicated for highway use, and cannot expend funding for providing capital programs for LRT 2. Local and Regional Transit agencies are dependent on the sales tax for revenue, are Projecting deficits, as their rider-ship rises. METRO is filling in temporarily with Capital funds,

And Sound Transit is projecting about a \$3 billion loss in projected funds to pay for their ST-2 Long Range Plan voters approved in 2008. The state makes little contribution to the support of any local or regional transit service.

I-301-001

ESHB 6392 specifies that the HOV lane will be available only for vehicles with 3 or more passengers. This assumption was evaluated in the Draft EIS, SDEIS, and Final EIS, and has been shown to result in free flow operations in the HOV lane with bus service levels near 600 vehicles per day. The State's HOV lane operations policy would be used to identify when the HOV lanes' operational thresholds were met and when an adjustment to the occupancy requirement would be recommended. Because ESSB 6392 specifies the HOV lane vehicle occupancy of 3 or more people, the State would need to request legislative approval to make any modifications.

The toll rates have not yet been determined. Under current state law, the Washington State Transportation Commission sets the toll rates (RCW 47.56). However, toll rates on the 520 corridor will vary by time of day. Toll rates will be lower at off-peak hours and higher at peak-hours.

I-301-002

Mitigation for construction and operation effects from the Preferred Alternative is described in the SDEIS and has been updated in the Final EIS. In compliance with project permitting requirements, WSDOT will continue to define measures to avoid, minimize and mitigate for project effects as design development moves forward.

Although no specific workgroup was created to make recommendations on all mitigation measures included in the SDEIS or Final EIS, several workgroups were created to coordinate with WSDOT and FHWA for specific aspects of the project. For example, the Design Refinements and Transit Connections Workgroup included representatives from the City of Seattle, University of Washington, King County Metro Transit, Sound Transit, and other stakeholders to consider design refinements and transit connections within the Preferred Alternative. The Natural Resources Technical Workgroup was created to better understand and

I-301-005	A supporters know that we need improved transit service for the new SR 520 HOV lanes, to reduce SOV trips. As this group seeks options for financing HCT, they should explore support a new source of funds for increased transit operations from
I-301-006	SR 520 Tolls. (May also need to make a change in our existing state laws.) 6) WSDOT is required" to develop a project mitigation plan to address mitigation for the Washington Park Arboretum", including enhancing wetland mitigation, and reduce impacts and to be consistent with federal and state laws. Submit a Mitigation plan by 12/31/10 to the state for the FEIS. Includes City Council, Mayor, U of W, consult with Arboretum Board Rep. Must include on-site mitigation of the Wetlands.
	Comment: A supporters urge that this Workgroup meetings be open to the Public. No amount of mitigation payments can compensate for keeping the Arboretum Ramps to be used for access to a state highway road, given the projected increase in the use of the ramps .if they are replaced
I-301-007	¹ 7.)A WSDOT Workgroup, including the Mayor and Council, SDOT and others are to study and recommend design refinements on the 520 Preferred Alternative selected by WSDOT in the SDEIS process, for 'timely progression' of the SR 520 bridge replacement, consistent with the SDEIS, and submit the recommendations to the Governor and Legislature by. 7/15/10
	Comment: This new 2010 legislation plus reading the City Council and Mayor' Draft 520 Reports on SR 520 was a "game changer" and changed my approach for to commenting on the 14,000 page SR 520 west-side SDEIS . It is a new ball game, <u>particularly since the proposed K and L designs are not viable SR 520 proposals anymore</u> . The <u>three Workgroups</u> listed above will focus and report on three of the west-side's most controversial and perplexing 520 issues, including <u>west-side 520 design refinements to promote timely progress and budget actions for the 520 replacement, consistent with the SDEIS, <i>Transit connections between SR 520 and Sound Transit's LRT station</i> at the U of W stadium area, and to address <i>mitigation for the Arboretum</i>, with up to a\$200 million fund added to pay for their west-side Workgroup recommendations. All of their meeting should have a Public Notice prior to Meetings, that are open to the Public.</u>
1-301-008	II. IsThere Support for a SR 520 West-Side LRT Design Now?- A supporters are for a policy that retains the SR 520 as a six lane corridor permanently, due to the sensitive environment on the west-side. Environmental agencies like NOAA were very concerned about the construction required for the 520 rebuild impacts, and do not want the area to be impacted ever again because of the cumulative impacts! So what should be done now to prepare for the future possibility of adding LRT to SR 520? The policy of precluding the future SR 520 LRT should also be studied in order to know the long term effects on our regional and local transit systems. Are revisions to SR 520's design needed now to make it easier and less expensive to retrofit for LRT in the future. What are the benefits and the costs?

Because my long term history and knowledge of the <u>cross-lake issues</u> (I-90 too) has focused on with land-use issues, I don't find that the present eastside development patterns, adjacent to SR 520 could support and use a cost-effective public LRT system. It would be In addition to the planned for and funded I-90 East Link, and the Sound Transit's SR 520 BRT

2

document the effects on both wetlands and aquatic resources, as well as appropriate mitigation for these effects.

Chapter 1 of the Final EIS discusses the various coordination that has occurred since publication of the SDEIS.

I-301-003

Earlier this year, the Washington State Legislature passed and Gov. Gregoire signed Engrossed Substitute Senate Bill (ESSB) 6392. ESSB 6392 directs WSDOT to work with regional agencies to refine components of the Preferred Alternative, including design refinements and transit connections, and transit planning and financing. The bill also directs WSDOT to develop a mitigation plan for the Washington Park Arboretum.

In response to this direction from the Legislature, WSDOT led the Design Refinements and Transit Connections Workgroup in collaboration with the City of Seattle, King County, the University of Washington and Sound Transit. The workgroup recommended an HOV/Transit lane on Montlake Boulevard between SR 520 and Pacific Street. Additionally, based on the workgroups recommendations, the Preferred Alternative includes signal controller equipment that is compatible with transit signal priority at the Montlake Boulevard/Pacific Street intersection.

I-301-004

Yes, this is funding committed to advancing the SR 520, I-5 to Medina project. Chapter 1 of the Final EIS provides additional discussion about how ESSB 6392 further shapes the SR 520 program, and the SR 520, I-5 to Medina project.

I-301-005

The ESSB 6392 workgroup explored funding sources for transit

I-301-008 Services. Too much and to early LRT capacity would be costly to build operate and would have negative land-use impacts on our adopted King County Urban Growth Boundary. It would encourage sprawl and encourage the developers to build further out, toward the Cascades, into another regional drainage Basin, and place pressure on moving the agreed upon current King County adopted Urban Growth Boundary further east, creating rural sprawl

1. There is <u>no existing LRT system plan for where another SR 520 LRT route to the U of W</u> would go in Seattle? How would it complement and not duplicate the planned Sound <u>Transit's LRT system</u>, without <u>expensive tunneling under or through Seattle many hills</u>?

I-301-009 (The following are questions for the ESSB 6293 WSDOT established SR 520 Workgroups that need to be answered when studying alternative connections for planning SR 520 Transit and the Financing an additional HCT system route.

2.a.) If LRT is added to a 6-lane highway corridor, can the two center lanes that are initially for

- HOVs be converted to a two-way LRT system in the future? Would a 6-lane (floating) bridge be structurally able to handle the added LRT weight with or without added pontoons?
- b.) Can the 6 lane bridge mainline lanes each-way, be converted for HOV lanes?
- c.) Could the remaining outside lanes would be used for two-way SOV traffic?
- d.) Are more pontoons needed to support the weight of a LRT 4-car train-set?
- e.) Would metering of the cross lake LRT service be necessary and limited only one train "set" on the bridge at a time, if the bridge is less that 6 lanes?
- f.) Is the static electricity from the LRT system on a 6-lane bridge with LRT too close to the pontoons, so there is a danger that it would corrode the steel in the pontoons?
- g.) With a second LRT line from the north, the transit planners have always projected that the

existing Seattle CBD Bus/LRT tunnel would be over its capacity, and another costly downtown tunnel would be required to serve it.

h.) Transit planners have also projected that the North Link line has enough use to balance

the LRT service on both the I-90 LRT line east and the South Link service. This means service would be balanced both ways, and no LRT would be "dead-heading" (making a trip with few of or no passengers

i,) The Eastside SR 520 transition span is 75' off the water to allow larger boats to travel to the south side of the Lake. Would the highway grade be compatible with limits for LRT to a 6% grade?

My initial conclusion is the planned expansion of capacity with the I-90 with East Link, will add increased cross-lake people-moving-capacity, especially with the added new I-90 HOV lanes to the east-side and the Sound Transit's new BRT service on SR 520. High speed I-90 LRT has adequate capacity to serve the projected east-side population and economic growth across-Lake Washington Transit service for at least the next 20 years. And it has been strengthened to handle the added LRT weight.

I-301-010 Study and consideration by city of Seattle and the Region needs to be redirected to what is **the Seattle Transit Plan** for future Transit improvements within the city, and relating it to the long range Sound Transit's System Plan. <u>What is Seattle long range Transit Plan for</u>

operations in the SR 520 corridor. These findings are summarized in the report "Transit Planning and Financing Findings and Recommendations Report" located on the workgroup website:

http://www.wsdot.wa.gov/Projects/SR520Bridge/6392workgroup.htm. The results of the ESSB 6392 workgroup efforts are summarized in the Agency Coordination and Public Involvement Discipline Report Addendum and Errata.

I-301-006

Since the SDEIS was published. FHWA and WSDOT have identified a Preferred Alternative that is most similar to Option A, but includes a number of design refinements that minimize the effects presented in the SDEIS. These refinements respond to comments made on the SDEIS and to WSDOT's work with many project stakeholders under Engrossed Substitute Senate Bill (ESSB) 6392, which was passed by the Washington State Legislature in 2010. See Chapter 2 of the Final EIS for a description of the planning process and the Preferred Alternative. One of WSDOT's key efforts under ESSB 6392 was to work with the Arboretum and Botanical Garden Committee (ABCG), of which the Arboretum Foundation is a member, to identify appropriate mitigation for the impacts of the I-5 to Medina project on the Arboretum. This work involved review of the Arboretum Master Plan and commitments by WSDOT to provide funding toward a number of projects in the plan. This 8-month coordination effort resulted in the Arboretum Mitigation Plan, which is included in Attachment 9 of the Final EIS.

I-301-007

As noted in the comment, 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

I-301-010 Connecting to the Regional System, and what is the Timing, the Priorities and the Financing options.

3. <u>Planning and Building LRT in Seattle</u> to the growing denser urban centers like West Seattle and

Ballard, could be more beneficial and responsive to the city's future economy and its citizens,

than to support LRT to the eastside, which today have few urban centers or dense growth patterns, and are not concentrating their growth enough to support an economical and efficient

LRT service with the SR 520 Commuter-shed.

I-301-011 III. Features of the A west-side Design That Should be Improved Compared with the current Design in the SDEIS

1. Option A includes support of a LID at **the I/5/SR 520 Roanoke Interchange**. But there is a existing center landscaped I-5 Median strip with some large trees. This I-5 planted median <u>that in SR 520 plan would be completely Lidded</u>. If it were completely lidded, the existing large, grey, ugly noise walls on both sides of I-5 would make this part of I-5 be like an ugly Tunnel, at this busy interchange. **Recommendation**: <u>When designed leave part of the LID open</u>.

- 2. The new reversible I-5 Express lane ramp for SR 520 Transit/HOVs to travel south AM and north on the I-5 Express lanes in the PM, is a welcome addition to speed Transit/HOV trips to and from the CBD. The express lanes have been underutilized for many years. I support evaluating them for a change in the express lane operations in favor of encouraging more two-way Transit/HOV use on the I-5 express lanes. (New SR 520 Tolls and new HOV lanes should increase Transit/HOV use, and WSDOT should work on changing the I-5 lanes to encourage transit two way/all day by working to change the operation. This future revision should be kept in when the design of the SR 520/I-5 Express Lane Ramp Connection is prepared. (*Rob Fellows, WSDOT, is your expert onI-5 Express lanes*)
- **I-301-013** 3, The Lids at E. Roanoke St and Delmar Drive, and 10th E. should be landscaped and have a plan for connecting to City Bike and Pedestrian-Trail Plans, to use as neighborhood connectors, and well as noise dampeners. The grand view from the little Bagley viewpoint should not be lost in the rebuild, but incorporated on one of the appropriate adjacent planned Lids.
 While commenting on Lids, I support increasing y Lidded green space in the vicinity of

Montlake Blvd.

- I-301-014 4. Increasing the width of the landscaping in the center of Montlake Blvd. is needed. There used to be Japan donated flowering Japanese Cherry trees, that were beautiful every spring, but when the road was widened they were moved to the U of W "Quad" for the students to enjoy.
- I-301-015
 5. The other Lid is the McCurdy Park Lid, omitted in many parts of the SDEIS discussion. A Seattle Park's staff report said that all of McCurdy Park would be taken by the West-side SR 520 project. I urge that the storm-water pond to be located on the McCurdy Park's former land be made to look as natural as possible. The removal of the Arboretum Ramps, which A

 4

workgroup process in collaboration with the City of Seattle, King County, the University of Washington and Sound Transit. Public notification and opportunities for public comment were provided for these workgroup meetings.

I-301-008

Modeling conducted by WSDOT following the SDEIS showed that opening the East Link light rail route on I-90, coupled with bus rapid transit service on SR 520 beginning in 2016, would absorb much of the demand for east-west transit service until 2030. Thus, if light rail transit were in service on SR 520 before this time, it would have relatively low ridership and would likely fail to satisfy the cost-effectiveness criteria used by FTA in ranking projects for grant funding. The existing economic climate and the resulting challenges in implementing even adopted and funded plans (see Sound Transit's ST2/Sound Move Integration and Implementation White Paper, October 2009) reinforce the decision to prioritize bus rapid transit on SR 520 at present, while continuing to evaluate future implementation of light rail transit as regional demand increases. Please see Chapter 2 of the Final EIS and Chapters 1 and 2 of the Transportation Discipline Report for more information about how light rail transit was evaluated.

However, there is no policy to preclude light rail on SR 520 in the future. 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 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

 I-301-015
 supporters are for, would mean that there wont be a new auto Ramps built over the Lid.

 That issue will be settled by the ESSB 6293 directive for WSDOT's to lead an Arboretum

 Mitigation Workgroup, this Spring and Summer. If the Ramps are not removed, using the Lid

 at McCurdy Park for a new access Ramp to SR 520, it would be a travesty and expensive

 mistake, and the Lid should be removed from the Plan.

I-301-016 The future meetings of the proposed Work-group on Arboretum mitigation should be open to the Public.

- I-301-017
 6. The City Council's SR 520 March 2010 Consultant's Report suggests removing the proposed two-way HOV lanes on the new Portage Bay Bridge, to reduce the footprint. This action would not be an aid for Transit and HOV users. It is inconsistent with opening the new I-5 Express lane reversible ramp into the HOV/TRANSIT two-way express lanes. If narrowed to four lanes Transit/HOVs would be in "mixed traffic on the Portage Bay Bridge. In addition the SDEIS states that at peak hours, the I-5/SR 520 intersection to and from the mainline lanes, will have congested delays and "spill-backs," with Single Occupant Vehicles unable to enter I/5 North or South ramps in the AM, and the reverse in the PM. Not having that two-way HOV lanes space for transit could lead to increased transfers at the Sound Transit U of W station. The LR service at this station isn't able to be used more as transfer Station from bus to LRT, because the LRT cars are projected to be crush load full, when they come from the either north or south to the Sound Transit's U of W LRT Station.
- **I-301-018** Finally A and A+ supporters are for **design competition** on the Portage Bay Bridge, to select the best design possible, at the least cost.
- I-301-019 10. There needs to be new, improved changing Message signage to assist in the channelization of Montlake Blvd. to reduce the barging of cars into lanes at the last minute to get to the correct West/East SR 520 ramps, with new entry ramp metering. The city's Consultant also recommended using the shoulder instead of adding an auxiliary lane on the westbound to the I/5 ramp at Montlake Blvd.

WSDOT staff should locate where in the world, urban areas have used an entry lane to a limited access freeway successfully, and the related traffic accident statistics. I tend to support the new auxiliary lane to help safely move the traffic off of Montlake Blvd. to SR 520. But the neighborhood opposes it and I do not want the historic NOAA Science Building, to be replaced for \$200 million, that is not in the 520 project budget, for the Montlake Blvd. SR 520 entrance west to I-5 ramp. Iane. **Recommendation**-WSDOT Staff work is needed to resolve this important question- an auxiliary lane versus a using wider shoulder

- **I-301-020** 11. The A 520 design's Interchange at Montlake Blvd. must be improved compared to the existing and confusing "U" turn pattern for SR 520 users traveling to SR 520 from the south on Montlake Blvd E. to travel east or west. Traffic calming and TDM is need on Montlake Blvd. E to assist transit and local pedestrians/bikers, and even potential transit users.
- **I-301-021** 12. Even though A has two Bus ramps onto Montlake Blvd E. in the design, I think that a change in their location is needed. Could we return to transit using the existing Loop, for transit to use to go East, where there are bus lanes/stops on Pacific St and closer to more users? This would allow passengers to either board at the Triangle transfer area, or at west-side Bus Stops. Having the ramp on the east side of Montlake E requires the buses from the

5

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.

Without a specific light rail transit alignment and service plan for the SR 520 corridor, the design options accommodate a number of potential configurations. However, full build out of light rail transit in the corridor would require modifications provided as a future project. Since rail transit in the SR 520 corridor is not programmed in current regional transit plans, any future project to add rail in the corridor would need to undergo an extensive planning and environmental review process by the responsible transit agency prior to implementation. It is clear that there would be a need for construction and additional costs to add light rail to the SR 520 corridor, but the costs and risks associated with such an addition have been minimized by the design elements included in the Preferred Alternative.

I-301-009

See the response to Comment I-301-008 regarding demand for high capacity transit in the SR 520 corridor and how the SR 520, I-5 to Medina project can accommodate potential future light rail.

As part of the ESSB 6392 workgroup process, WSDOT worked with Sound Transit, King County Metro, the City of Seattle, and the University of Washington to address a number of concerns. The process included a design refinements and transit connections workgroup, and a high capacity transit planning and financing workgroup. See the reports of these workgroups at

http://www.wsdot.wa.gov/Projects/SR520Bridge/6392workgroup.htm.

 I-301-021
 north LRT station going east to need a traffic light to turn left on the interchange overpass, to move to the bus ramp to SR 520, on a very heavily use street.

 I don't support a Bus stop at the East Entry ramp because a bypass would be needed for HOVs to enter while the bus is stopped, would back-up traffic, and would increase the SR 520 footprint significantly.

Now that we will have HOV lanes, WSDOT should investigate a new option that could also be used for **HOV cars to add/ pick-up HOV certified riders** at one of the designated westside Bus Stops. This program is used successfully on the entries to some San Francisco Bridges

I-301-022 13. Another suggested change the exit for west-bound buses from the east, exiting at Montlake to connect to the U of W or LRT station ,or to travel north. Could if be designed to use the inside of the existing off-ramp the north side of the SR 520. The ramp could move toward the exit starting near to the existing 24thE.overpass, by MOHAI. Would may take some of the load off of Montlake Blvd., and help to decrease the 520 Interchange's footprint?

Since there is so much Transit service on Montlake Blvd., second to the Seattle CBD, WSDOT must work with SDOT and the Transit agencies to improve the SR 520 transit access and exit ramps into and out of the <u>preferential arterial transit lanes</u>, at least at the <u>peaks and give Transit the ability to extend the arterial green lights</u>, <u>particularly at the Montlake Blvd NE/NE Pacific St. Intersection</u>.

I-301-023 14.. SR 520 needs new enhanced planned "Complete Streets" improvements for connecting <u>Transit-users</u>, <u>Bicyclists and Pedestrians</u> to the surrounding Trail systems and Bike routes. Adding the Montlake parallel Bascule Bridge provides a new capacity for moving Transit through this busy corridor, but it also provides an <u>opportunity to provide more space for the Pedestrians</u> and Bikers to safely cross the Montlake Cut. The operations on the bridge should be planned to have safe non-auto lanes to reach the SR 520 Regional Bike/Ped Trail to the east side, or to cross the McCurdy Park lid to move to the Arboretum safely, or travel further south to the I-90 corridor bike lane, or on the Lake Washington Blvd and south to waterfront parks.

The area around the Montlake Bridge has heavy pedestrian and bike use and WSDOT needs to do some design work to improve the SR 520 connectivity with new plans and signage that explain the potential of the new connections to and from SR 520 for these users.

- **I-301-024** 15. The removal of the existing <u>SR 520 Freeway Level Flyer Stops</u> is an improvement and narrows the 520 interchange footprint. They are to be replaced with every type of transit service they provided, only better than ever, and it results in an interchange which is narrowed by 60'-70'.
- **16.** I agree with the Consultant's statement is his report to the City Council that the SR 520

 West-side "portion from the High-rise to I-5 is the most difficult and sensitive area and needs to be planned with the best current thinking available now to 'get it right' in terms of the next 100 years".

Responses regarding specific question in the comment are below:

Both approaches to adding light rail outlined in the response to Comment I-301-008 (converting the HOV lanes or adding new light-rail-only lanes) would require additional supplemental stability pontoons (see Section 2.4 in the Final EIS).

WSDOT undertook additional analysis after the SDEIS was published to help answer public questions about how rail in the SR 520 corridor might operate and the ridership it might generate (see Section 2.4 in the Final EIS). With the addition of light rail, general-purpose lanes would not be converted to HOV use. Eliminating the benefit of HOV lanes and adding light rail service would reduce the number of carpools, but it would not eliminate the demand for carpooling. (The analysis assumed no tolls for carpools with 3 or more occupants.) Further, a single general-purpose lane in each direction would substantially restrict cross-lake mobility. With light rail service on SR 520 and I-90, the demand for generalpurpose travel would still require two lanes in each direction on SR 520.

The comment request information related to light rail on a bridge with fewer than 6 lanes. A bridge with fewer than 6 lanes is not proposed, because it would not meet the mobility portion of the SR 520, I-5 to Medina project's purpose and need; this was confirmed with updated transportation analysis in 2010 (see Table 2-1and also Sections 2.3 and 2.4 in the Final EIS).

The floating bridge is being designed with an elevated bridge deck to address corrosion concerns associated with light rail.

Proposed grades on the bridge approaches would be compatible with potential future light rail transit.

While WSDOT is not the agency responsible for implementing light rail in

I-301-026

16.Achieving Future Improved Performance and long term Sustainability for SR 520/I-90 Operations and Modal Goals and Objectives- Achieving Positive Planning for Performance

A new step forward has been taken to enable the actual Monitoring of the overall multi-modal Performance of SR 520/I-90 as one of the major regional corridors, and it's the adjacent arterials. The regional PSRC's new Vision 2040 (land use plan, and the adopted Transportation 2040 Plan have included a SMART Corridor's Program. PSRC will start soon to collect data from state, regional and local transportation modes, operating on the two corridors to obtain an overview of the two corridor's Performance. With this information they will be able to make recommended changes

If needed jointly on both SR 520 and I-90, to meet their adopted Corridor Goals, Objectives and adopted policies and cross-lake and Reporting it regularly to the users, and adjacent jurisdictions.

(Note: Background: The PSRC's Corridor Management Program is the new Transportation Demand Management Tool that is the result of the WSDOT "TEEM" Consultant study about 2000-2002 to study the benefits of Managing the Performance of major multi-modal urban Corridors. It was funded with an \$850,000 grant from the FHWA. After the study was completed it was passed on the PSRC's Staff to implement, as part of their PSRC Regional Plan update and their Transportation Management Program.

I was involved in the Translake study at the time and suggested WSDOT seek the Grant to improve our knowledge about managing multi-modal Corridors, to help prevent the need for expanding SOV capacity, through alternative modes and transportation management polices. I think of it as being similar to a Transportation Performance Audit, except it continues from year to year will report its findings to the users and the public and recommends adjustments in the various modes to improve the Corridor performance to keep it sustainable over time.

A New GMA Local and County SMART Corridor Monitoring Program Too.

Recently I learned of changes in the new state GMA Administrative Rules 365-196-430, in the Transportation Element-Guiding the Implementation of the state's Growth Management Act for local cities and counties "transportation element" which are complementary to the PSRC's new Smart Corridor program

It includes a requirement that cities and counties they have transportation and land use elements that contains the "estimated impacts to state owned transportation facilities' and changing results from land use assumptions, to assist in monitoring the performance of state facilities and to plan improvements for the facilities, and to assess the impact of local land use decisions on state owned transportation facilities

It also states the purpose is to reflect the level of service standards for state highways in the local comprehensive plans and to monitor the performance of the system and to evaluate improvement strategies to facilitate improved coordination between local, county and state transportation programs,

Comment: We need to become more aware that we live in transformative, "game-changing times for transportation when we are coping with how to reduce trips with gas-driven vehicles to reduce four state's 50% contribution's GHG emissions and using vehicles that are fueled using scarce and expensive foreign energy, to move around. Right now it is difficult to make predictions about the future direction and use and potential funding to support of our

7

the Puget Sound region, WSDOT will continue to work with Sound Transit as ST studies the potential for long-term implementation of rail in the SR 520 corridor.

I-301-010

See the responses to comment I-301-008 and I-301-009 regarding demand for high capacity transit in the SR 520 corridor, how the SR 520, I-5 to Medina project can accommodate potential future light rail, and how WSDOT will continue to work with transit agencies. Also see Section 2.4 of the Final EIS, the Final Transportation Discipline Report, and the SR 520 High Capacity Transit Plan which is located at: http://www.wsdot.wa.gov/Projects/SR520Bridge/Library/technical.htm#tr ans.

I-301-011

Instead of a lid over I-5 in the Roanoke area, the Preferred Alternative includes an enhanced bicycle and pedestrian crossing of I-5 at East Roanoke Street.

I-301-012

Comment noted. The Preferred Alternative includes a reversible HOV ramp to the express lanes south of SR 520, and would not preclude future additional changes to the I-5/SR 520 interchange.

I-301-013

The new 10th Avenue East/Delmar Drive East lid would function as a vehicle and pedestrian crossing, a landscaped area, and open space. A curvilinear walkway across the lid would connect the two streets. The lid would range from 500 to 650 feet long (because of the angled lid edge) and would reconnect neighborhoods on both sides of the SR 520 corridor by providing walkways and open spaces above the SR 520 roadway. The top of the lid would meet 10th Avenue East and Delmar

 Image: Image: Transportation systems, and how in fact people will adjust to the to any new limits to our movement, or new opportunities for moving around differently. Changes in our transportation mode will change how we live, and these new changes for new regional SMART Corridor like SR520/I-90 with and local transportation and land use planning is a new hopeful direction to reduce our fragmented planning processes.

I-301-027 | III. We Reject the Proposed SR 520 SDEIS K, L and M Designs

1.K-Design Issues-The <u>K design must be rejected</u> because it does not meet the SR 520 project <u>purpose and need</u>, does not meet previous and existing state Legislature's existing laws, and has significantly impacts the sensitive, surrounding environment where it was planned to be built, and was estimated to be at least \$2.billion over the \$4.65 billion total Project Budget Limit, set by the Legislature.

2. K at Union Bay–The K East Montlake Interchange design has 4 lanes, 2 each way to move through a Tunnel. Because of its location the tunnel would have to be 150' wide, due to a 50' middle support section. Transit would be with mixed traffic, not HOV lanes. The under water level Interchange called "the Boat" entrance has no preferential merge lane or ramp for Transit. It would be located within McCurdy Park, and it would also impact East Montlake Park, which would be a major federal "4f" and 6"Fissue, and limit receiving federal grant funding for SR 520.

The proposed complex K design Interchange is located for the south-east side of the Cut. K is designed with an underwater 'single- point urban interchange' called "the Boat," by Tunnel experts. If built, it would have removed a large grove of Willow trees that buffered adjacent homes from viewing SR 520, or hearing the 520 traffic noises. The entry to K was through the entrance from Washington Park Boulevard by the "Ramps to Nowhere." K impacts the Arboretum area, McCurdy and East Montlake parks, with a planned Tunnel across and under the Montlake Cut. On the north side the Tunneling for K continues under the U of W south Stadium Parking lot.

It was not to be used as a new north/south crossing for local trips. But only for entering and leaving SR 520, with ramps to travel east or west. K's north exit and entrance, due to the 8% grade needed to Tunnel under the Cut, and was designed to be 20 feet below the arterial surface street level at the Montlake Blvd.NE /NE Pacific St. intersection. With the exit and entrance 20' below street grade, those using it would take a left, right of straight choice, on a sloped grade to get to the surface street level,... Over this inter-section K planned a circular Lid/cover, to aid Pedestrians and Bicyclist to find passage over a heavy trafficked area.

3. Locating the interchange in a new East Montlake Location. A Tunnel this size would meter the entering and exiting traffic and its capacity, so it would likely have back-ups for vehicles entering from the SR 520 mainline at peak hours. The construction would be started by freezing the ground under the cut for 5 months, before the Tunnel is hand-mined and then lined. One of the risks is that if the freezing process if not sufficient, it could cause what the expert's call an unplanned "blow-out" that could lengthen the construction time and costs.

<u>4.</u> Another limitation is that the endangered species salmon run in the Cut prevents any work in the water or with anchored barges for 5 $\frac{1}{2}$ months of the year. So the construction 8

Drive at the level of the roadway. The surface of the lid would slope from the high point in the southwest corner at 10th Avenue East to the northeast corner at Bagley Viewpoint. During design planning, the community identified pedestrian connections and improved traffic flow as the two most important purposes for this lid. The lid would incorporate additional pedestrian connections between 10th Avenue East and Delmar Drive, redevelopment of the path from Bagley Viewpoint to Boyer Way, redevelopment of the Bagley Viewpoint Park, and vista points to overlook Lake Union, Portage Bay, and the panoramas east- and westward.

The Preferred Alternative includes a full lid from Montlake Boulevard to beyond 24th Avenue E near the Lake Washington shoreline. The intent is to provide greater pedestrian amenity in the central part of the Montlake neighborhood while simultaneously providing a better location and environment for the regional bus stops incorporated in the transit/HOV direct access ramps. The lid would function as a vehicle and pedestrian crossing, a landscaped area, and open space.

I-301-014

The medians along Montlake Boulevard referred to in the comment are part of the original Olmsted design for Lake Washington Boulevard and are considered historic. Any alterations to these medians would require context sensitive design and consultation with Section 106 consulting parties. Improvement of the medians is not expected to be part of this project, although one median between East Hamlin and SR 520 would be affected and WSDOT is working with the consulting parties to ensure that the one median would be restored in context sensitive manner.

I-301-015

The Preferred Alternative would physically remove the existing Lake Washington Boulevard eastbound on-ramp and westbound off-ramp and the R.H. Thomson Expressway ramps. **I-301-027** time window is longer and much of the Construction soil hauling and, storage of equipment for the project would be on adjacent land, that is existing Park lands. If built, the Tunnel would have an 8% Grade and a sharp curve that would slow Trucks and Bus movement. With limited lane capacity in a 4-lane Tunnel all of the exit and entrances ramps would be congested most of the time.

The 20' below the street level exit and entrance would be located at the busy (LOS F today), Montlake Blvd NE/NE Pacific Place Intersection. Tunnel traffic entering and exiting are predicted to "spill back" into the Tunnel, and onto the 520 mainline lanes at the peak hours. The below the ground entrances and exits at the Intersection would be sloped in order that exiting Tunnel traffic would emerge on a sloped roadway, to the surface street level. In addition, K planned_to build a pedestrian Lid_over the Intersection. A major Seattle water main helped to discourage this K design. Relocating it would have closed the busy intersection for an estimated 6 months, not counting the tunnel construction contract impacts. Over <u>57,000 truck loads</u> of tunnel dirt would have to be removed for the K options, which would have had great impacts on the U of W facilities, the neighboring communities and the local arterials.

During K's construction City Parks, Wetlands, and sensitive habitats would have been impacted due to the process for the removal of dirt at the surface to haul it away. The underwater interchange is another reason why the costs for this design ballooned above the budget by \$2.Billion. Seattle's Park's <u>Initiative 42</u> (1996) that limits any change in use of any Seattle park would have also limited the use of city park lands for non-park purposes, for this proposed K design.

K's Foot-print in the SR 520 SDEIS on Page 19 of the Executive Summary, is 250' wide, with the Arboretum ramps located under a Lid at Foster Island, with a large Land bridge to Foster Island. In comparison, the L diagonal bridge design was projected to be 270' over Foster Island.

- I-301-028
 The L design was a large, diagonal Bascule Bridge over the Cut, east of the current interchange in McCurdy and East Montlake Parks, and a large above ground Interchange fir the bridge to cross into the U of W south parking lot. Technically is was larger than any bascule bridge that had ever been built and the Bridge designer experts said that it was not feasible.
- **I-301-029** The M "Tube" Tunnel Design, west-side interchange, which is not in the SDEIS, but was proposed after the K supporters found that K's design is was too expensive, over the project budget, and would not be approved by the state and federal DEIS reviewers. The proposed M's west-side Route, Interchange and Tunnel are similar to the K options, except the Tunneling sections are more environmentally damaging. This is because M needed to excavate in the Cut, below the 30' navigation level, in order to install the large highway lane width Tunnel Tubes, that would be constructed off-site. It also required coffer-dams on the sides of the "historic" Cut, for the below the cut tube tunnel installation. The construction window for the M option was limited, due to the need to protect the endangered annual salmon runs in the Ship Channel.
- **I-301-030** Fortunately, our state SEPA and federal NEPA environmental reviews saved all of us and the adjacent sensitive environment; endangered species, wetlands, parks and open spaces from further consideration of the K, L, and proposed M SR 520 west-side design options.

9

The errata sheet for the Recreation Discipline Report (Attachment 1 to the Recreation Discipline Report Addendum, which is located in Attachment 7 to the Final EIS) adds further discussion of McCurdy Park to the discipline report. See the Final Section 4(f) Evaluation (Chapter 9 of the Final EIS) for further discussion including proposed mitigation.

Drawing upon stakeholder input from both the Design Advisory Group (DAG) and mediation processes (2008), the SR 520 Urban Design team developed a series of design priorities for the SR 520 corridor, including proposed roadway and lid improvements in preparation of the preferred alternative. Conceptual design for the preferred alternative included providing Americans with Disability Act (ADA) access, reconnecting separated neighborhoods through the use of lids, urban and historic aesthetics, preservation and enhancement of green and open spaces, access management, and mobility improvements through a variety of transportation mode choices and routes. Updated information on urban design for the project can be found in the ESSB 6392 Workgroup Design Refinements and Transit Connections Final Report and Appendix A: White Papers dated October 1, 2010.

WSDOT will work to create a landscape in keeping with surrounding neighborhood values while providing function and maintainability. There are processes coming up with design commissions and collaboration with the City of Seattle to directly address the design of specific facilities including stormwater facilities.

I-301-016

Please see the response to Comment I-301-007.

I-301-017

Since publication of the SDEIS, WSDOT has identified a Preferred Alternative with 6 lanes and a managed shoulder across Portage Bay. I-301-030 About the same time the A and L supporters held a meeting together and decided to join together in support of the A design. L Proponents agreed with all parts of the A design, except the removal of the Arboretum Ramps. To differentiate between the two the L supporters decided to call their option A+

One of the major objectives of the A SR 520 design supporters is to improve local and BRT cross-lake Transit services on SR 520, and on the adjacent arterials. To be competitive with using the private car, transit must be efficient in the new HOV lanes. Paying a Toll for SOV vehicles to use the existing SR 520 lanes in 2011, and more when it is completed will be compared to the costs and speed of transit service to the same location. I look forward to continuing to be an involved citizen as WSDOT's SR 520 Workgroups

established in the 2010 ESSB 6293 520 legislation as they deal with--the issue of Transit connectivity, -Mitigation of SR 520's impacts of the Arboretum, *hopefully by removing the Arboretum Ramps*

Permanently and the Study of the need to develop LRT on the SR 520 Corridor in the future.

I. MY Background History and Involvement with SR 520: My support for the west-side SR 520 A design without the Arboretum Ramps was founded after 13 years of my involvement in working with others for the best design package for solving how to rebuild SR 520. I was a member of the 1997/200 Trans-lake Study group that reviewed alternative designs for Transit and Highway options, and information on the environmental impacts. This study was the "Big View" look at the SR 520/I-90 corridors jointly and we were immersed with the cross-lake, long-term view for transportation modal options. From its information, decisions were made as to the recommended number of lanes, and which corridor would be the best, most cost effective and efficient for an LRT crossing of Lake Washington.

After a 520 project budget reduction and delays, the SR 520 Executive Committee comprised of local elected officials and chaired by a former WSDOT Commissioner, submitted a 2006 SR 520 Pacific Interchange design and the DEIS was available for Public Comment on the 4, 6 and 8 lane 520 designs. The Pacific Interchange was opposed by many and failed to meet the "purpose and need" for the project. It was decided to try again for a rebuild design option, with another Public Process through a Mediator.

 I-301-031
 Two Year West-side Mediation Process- After the 2006 DEIS process the Governor declared that the SR 520 would to be <u>6 lanes</u>, eliminating the 8 and 4 lane options. Two of the lanes would be two-way center HOV lanes. New legislation required a two-year <u>SR 520</u>

 Mediation process.
 I was asked to represent the <u>Ravenna/Bryant Community Association</u>. The Legislation also required that two studies: a <u>2008 Health Impact Plan</u> and a 2008 High Capacity Study, which are barely mentioned in the 2010 SDEIS Documents.

I-301-032 The Mediation process focused the group on developing a range of SR 520 west-side designs. A list of designs from A to L were developed and reviewed, for their "feasibility and reasonableness," with many participating community representatives and other relevant stakeholders represented. We were asked to decide on three west-side 520 designs to be reviewed for the forthcoming 520 SDEIS. Finding that there was **no agreement** on one **Preferred Design**, the three final 520 designs were presented in a **Project Impact Plan** that was completed and sent to the Governor and the Legislature at the end of 2008.

10

Section 5.1 of the Final EIS explains the freeway operation and travel time benefits for transit and HOVs.

I-301-018

Comment noted. The design competition for the Portage Bay Bridge is a possibility.

I-301-019

As an outcome of the ESSB 6392 workgroup process, WSDOT will coordinate traffic management in the project area with existing and planned SDOT efforts and private development efforts. The Workgroup recommended that traffic management approaches should be accompanied by an intelligent transportation system (ITS) plan for Montlake Boulevard and 23rd Avenue. The Workgroup also recommended establishing a schedule for ownership and implementation of traffic management opportunities in the first quarter of 2012. A full description of recommendations from the workgroup process can be found in the complete ESSB 6392: Design Refinements and Transit Connections Workgroup Recommendations Report (Attachment 16 to the Final EIS).

Since publication of the SDEIS, WSDOT has identified a Preferred Alternative with six lanes (4 general-purpose and 2 HOV/transit) and a westbound managed shoulder across Portage Bay. Section 5.1 of the Final EIS and Chapter 5 of the Final Transportation Discipline Report explain the freeway operation and travel time benefits for transit and HOVs.

I-301-020

With the Preferred Alternative, the Montlake Boulevard/westbound SR 520 ramp intersection would be signalized and a northbound left turn from Montlake Boulevard onto westbound SR 520 would be allowed.

I-301-032 2009 Adoption of ESHB 2211, May 2009-This state legislation authorized pre-construction Tolling on 520 to begin in 2010. It set a limit on the total cost the SR 520 project Budget at \$4.65 Billion, which became our A design supporters' maximum cost target. It also set up a 2009 SR 520 Legislative Workgroup to study the west-side and recommend a preferred Design, which after 5 months of study was A+, along with 520 Funding and Tolling Strategies.

> They consulted with the affected state and federal agencies, relevant interest groups and neighborhoods and communities. During the Workgroup meetings, DEIS reviewers from the state and federal agencies testified to the Workgroup on the feasibility of the three designated 520 designs to be reviewed in the SDEIS process. Only the A options did not have the major environmental problems found in the K and L designs. On November 17, 2009, the 520 Legislative Workgroup voted to support the A+ 520 Design to the Legislature and the Governor, And their work is now history.

File: SR 520 SDEIS Gunby Comments 41510.doc

Access from westbound SR 520 to areas south of the interchange area would be provided via 24th Avenue East. These changes would eliminate the existing northbound bottleneck at the Montlake Boulevard/East Hamlin Street intersection, reduce northbound congestion, and improve safety in the area. As shown in Exhibit 6-3 in Chapter 6 of the Final Transportation Discipline Report, with the Preferred Alternative, intersections in this area would operate at acceptable conditions and/or better than the No Build Alternative.

As part of the 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.

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.

I-301-021

Please see the response to Comment C-301-003.

I-301-022

The Montlake Freeway Transit Station stops were removed in all of the design options considered in the SDEIS, based on a decision making process that was part of Westside mediation. The mediation process was mandated by Engrossed Substitute Senate Bill 6099 and is described on pages 1-17 through 1-19 of the SDEIS. The mediation workgroup consisted of members from adjacent neighborhoods, transit agencies, jurisdictions, and State agencies. Removing the Montlake Freeway Transit Station would minimize the width of the freeway through

the Montlake area, reducing the width by up to 40 feet compared to keeping the station. The mediation workgroup did not recommend any design options that included the Montlake Freeway Transit Station stops. See Attachment 8 to the SDEIS, Range of Alternatives and Options Evaluated, for further discussion of how and why removal of the stops was considered.

The Preferred Alternative includes removal of the Montlake Freeway Transit Station stops; however, it also includes a modified Montlake Boulevard interchange and lid. 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 (see Chapter 2 of the Final EIS for a description of the Preferred Alternative). The intent is to provide greater pedestrian amenity in the central part of the Montlake neighborhood while simultaneously providing a better location and environment for the regional bus stops incorporated in the transit/HOV direct access ramps (see Chapter 2 of the Final EIS). At the option of the transit agencies, SR 520 buses will be able to exit at the Montlake interchange during the off-peak periods to service passengers to/from the Montlake lid transit stop. University Link light-rail service, expected to be operational in 2016, will accommodate some of the trips that now use the bus stops. Chapter 8 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) provides further discussion of expected transit operations with the Preferred Alternative, including expected transit travel times, rider connections, and how future transit would incorporate service currently provided at the stops.

I-301-023

In accordance with the requirements of ESSB 6392, WSDOT has worked collaboratively with SDOT, the City of Seattle Pedestrian Advisory Board, and Seattle Bicycle Advisory Board to develop design refinements for pedestrian and bicycle facilities. These design refinements would improve safety and enhance the pedestrian and

bicycle experience in the Montlake interchange area and include improved connections between the new regional bicycle path on SR 520, the Burke Gilman Trail, and the nearby designated City of Seattle bicycle routes. The resulting design refinements are included in the 6392: Design Refinements and Transit Connections Workgroup Recommendations Report (Attachment 16 of the Final EIS) and described in Chapter 7 of the Final Transportation Discipline Report.

I-301-024

Please see the response to Comment C-301-022.

I-301-025 Comment noted.

I-301-026 Comment noted.

I-301-027 Comment noted.

I-301-028 Comment noted.

I-301-029 Comment noted.

I-301-030

Comment noted. WSDOT received a number of comments in support of and in opposition to Options A, K, and L and the associated suboptions. These opinions are summarized in the Supplemental Draft Environmental Impact Statement Summary of Comments (WSDOT, April

2010), available at http://www.wsdot.wa.gov/Projects/SR520Bridge/SDEIS.htm.

Since publication of the SDEIS, WSDOT has identified a Preferred Alternative, which is similar to Option A but with a number of design refinements that would improve mobility and safety while reducing negative effects. Chapter 2 of the Final EIS describes the Preferred Alternative and Chapters 5 and 6 describe its environmental effects.

I-301-031

The SR 520 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. It noted that many measures already included in the SR 520 project (e.g. bicycle/pedestrian paths, lids, urban design elements) would improve walkability, bicycling, and transit access in the project area, thereby providing general health benefits.

Human health issues were one of the stated purposes in the National Environmental Policy Act of 1969. Scientific knowledge of the interactions between people and the environment has increased since the Act was first passed, and these advancements have been reflected in the evolution of the scope and analyses of impacts that are included in EISs. While there is rarely a section entitled "Human Health Impacts" in an EIS, evaluating and protecting human health is one of the reasons

behind many of the studies conducted in the preparation of an EIS.

While construction of the project would involve temporary closures to some bicycle and pedestrian trails, once completed it would improve opportunities for bicycle and pedestrian recreation by providing a bicycle/pedestrian lane across the floating bridge with connections to regional trails. See Sections 5.4 and 6.4, Recreation, of the Final EIS for further information on the recreation effects of the Preferred Alternative. See the responses to comments F-003-006 and L-004-018 for further discussion of how the EIS includes recommendations from the HIA.

I-301-032 Comment noted.