

Jennifer Young, Environmental Manager  
SR 520, I-5 to Medina Bridge Replacement and HOV Project  
SR 520 Project Office  
600 Stewart Street, Ste. 520  
Seattle, WA 98101

April 15, 2010

Sent electronically

Dear Ms. Young:

C-029-001

We are writing in response to the SDEIS for the SR 520 project. First we want to endorse and support the comments from Canterbury Shores SR 520 Committee and the Board of Directors of Canterbury Shores and we support the letter from Jim Hagan on the 520 plans. We have adopted those reports as additional reports on behalf of the Madison Park Community Council.

The proposed SR 520 design would inflict permanent long-standing damage to vital Seattle neighborhoods, destroy precious wetlands, wildlife areas and wildlife (beaver and heron, potentially nesting eagles) on the north east end of the arboretum and cause permanent visual and noise damage along the western side of the 520 corridor (Madison Park to I-5). Also, the design does not improve traffic congestion on surface streets in Seattle or I-5 going north and south. In all likelihood, it would add to congestion on surface streets.

C-029-002

In addition, we would like to reply to a number of issues in the SDEIS:

**1) Process: Omission.**

We appreciated the earlier work on 520 with the mediation committee. What is of grave concern to us, however, was the process after the 520 design went to the Legislative Work Group (LWG). The LWG announced the final design recommendations in mid-November 2009, with a public comment period ending December 4<sup>th</sup>—a totally inadequate public comment time for a final design of a project of this magnitude. While there were numerous community meetings on the various alternatives prior to the alternatives going to the Legislative Work Group (LWG), there were virtually none after the final design A+ was proposed. The City Council had a meeting; a Town Hall by our 43<sup>rd</sup> District state legislators was held, but only one WSDOT public meeting was held to address the SDEIS.

‘Due process’ is a fundamental right in the United States. There was no due process to vet the impacted communities on the design once the final decision was made. We urge WSDOT to work with the impacted communities as the final design is drawn to prevent unilateral and adverse impacts.

**C-029-001**

After the SDEIS was published, FHWA and WSDOT developed a Preferred Alternative that is similar to Option A but incorporates design refinements which further minimize or reduce the effects presented in the SDEIS. These improvements are based on recommendations of the legislative workgroup authorized by Engrossed Substitute House Bill (ESHB) 2211 and on comments from the public, community groups and other stakeholder organizations, tribes, and local, state, and federal agencies. The Final EIS describes the effects of the Preferred Alternative, including effects based on information that has been developed since the SDEIS was published. Please see Chapter 1 of the Final EIS for a description of the Preferred Alternative, and please see the following responses to comments C-029-002 through C-09-017 for further details.

**C-029-002**

Upon publication of the SDEIS, WSDOT initiated a 90-day public comment period. In making the decision to move forward with the Preferred Alternative, WSDOT considered comments from agencies, tribes, community organizations, many other stakeholders, and the general public, along with the findings of the ESHB 2211 legislative workgroup. The decision followed years of study, including the Westside mediation process. Please see Section 2.5 of the Final EIS for information on how and why the Preferred Alternative was identified. See also the Agency Coordination and Public Involvement Discipline Report Addendum (Attachment 7 to the Final EIS), which details agency and tribal coordination and public involvement since publication of the SDEIS.

Public outreach process for the SR 520, I-5 to Medina project does not end with the Final EIS. After the Final EIS has been issued, FHWA will prepare a Record of Decision documenting the course of action it has decided upon as the federal lead agency. The Record of Decision will

C-029-003

## 2) Construction Priorities: Omission/error

The SDEIS stated the goal for 520 Replacement:

*The purpose of the project is to improve mobility for people and goods across Lake Washington within the SR 520 corridor from Seattle to Redmond in a manner that is safe, reliable, and cost effective, while avoiding, minimizing, and/or mitigating impacts on affected neighborhoods and the environment. Page 1-4, S/D:IS*

It was repeatedly stated in the SDEIS that the bridge is in danger of structural failure from storms and earthquakes. If there were to be an incremental approach to SR 520, the first priority would be the floating part of the bridge, because it is the most vulnerable to earthquake and storms, the second would be the bridge over Portage Bay, and the third would be the west approach of 520.

*If the project is phased, WSDOT would first complete the project components that are vulnerable to windstorms and earthquakes.*

*Exhibit 2-21 shows how these vulnerable elements are prioritized. The highest-priority components in the project area are:*

- *The floating portion of the Evergreen Point Bridge, which is vulnerable to windstorms. This is the highest priority in the corridor because of the frequency of severe storms and the high associated risk of catastrophic failure.*
- *The Portage Bay Bridge, which is vulnerable to earthquakes. This is a slightly lower priority than the floating bridge because the frequency of strong earthquakes is much less than that of severe storms.*
- *The west approach of the Evergreen Point Bridge, which is also vulnerable to earthquakes. **Replacing these components would allow WSDOT to fulfill the safety and reliability aspect of the project purpose and need, while the remainder of the project would fulfill the mobility aspect.** It is important to note that, while the new bridge(s) might be the only parts of the project in place for a period of time, WSDOT's intent is to build a complete project that fully meets all aspects of the purpose and need. SDEIS, 2-24*

However, the legislature and the Governor have released the funding for the safety work for the floating part of SR 520 to be used for work on the East Side of 520, which is *not* one of the priorities listed in the SDEIS.

C-029-004

The SDEIS also reported that after its public comment period, the number one lesson learned was to "protect and enhance the neighborhoods" (SDEIS 1-39-41).

### *What have we learned from these outreach efforts?*

*WSDOT continues to hear comments from the public similar to those that were heard before and during the comment period for the Draft EIS. Comments provided during ongoing outreach activities have included the following common themes:*

- *Protect and enhance neighborhoods and community connectivity.*
- *Maintain local parks and trails and add a new bicycle path.*
- *Include noise reduction measures throughout the SR 520 corridor.*
- *Minimize air pollution.*

explain how the lead agencies intend to implement mitigation measures and conservation actions in compliance with NEPA and other laws. Although the Record of Decision is the conclusion of the NEPA process, it signals the beginning of project implementation, during which WSDOT will continue to develop the engineering design for the project. The design progression will include additional detail on project phasing, construction staging, and construction techniques. WSDOT will also develop specific plans and designs for mitigation measures, which will be documented in project permit approvals. WSDOT will comply with all applicable regulations during construction and will continue to work with affected communities to develop construction mitigation measures through the permit and approval process.

## C-029-003

WSDOT's highest priority is to replace the Evergreen Point Bridge and its approaches, because they are the corridor elements most vulnerable to structural damage or failure.

As shown in Exhibit 1-5 of the Final EIS, WSDOT has proposed project construction for completion by 2018, based on the assumption that full funding will be allocated by 2012. Currently committed funding is sufficient to construct the Evergreen Point floating bridge and landings; a Request for Proposals has been issued for this portion of the project, with proposals due in June 2011. However, as discussed in Section 2.8 of the 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. 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.

C-029-004

- *Toll the SR 520 Bridge (Evergreen Point Bridge) to raise revenue for the project, but carefully consider toll rates.*
- *Improve and expand the HOV and bus system.*

This plan in fact does the reverse of these public comment priorities.

So what is the priority for 520? Barge ahead? Or address the safety concerns outlined in Chapter 1 of the SDEIS?

C-029-005

**3) Retrofitting: Omission.**

Statements were made in the SDEIS that retrofitting would be as expensive as building a new bridge. But, no evident calculations were included to support this statement. Given that both I-5 and Highway 99 have been retrofitted, why was this not addressed with more detail/evidence in the report or documented in some fashion?

C-029-006

**4) Noise: Omission/error**

Noise is a significant health risk. Many parts along the west corridor of 520 will be adversely impacted by noise from construction and post construction use of 520. The matter is of such concern that the impact of noise was addressed at some length the Seattle-King County Department of Public Health: <http://www.kingcounty.gov/healthservices/health/ehs/hia.aspx>

The only 'solutions' addressed in the SDEIS were quieter pavement and 'noise' walls eight to 14 feet tall.

Not addressed in the SDEIS is the impact of concrete walls on the weight of the bridge or their visual impact on surrounding neighborhoods. What is the impact of noise walls on air quality inside those walls? What is the impact of gale force winds on a higher concrete structure with 8 to 14 foot solid concrete walls?

Has the concrete barrier design been reviewed by the appropriate, independent structural or civil engineers?

C-029-007

The SDEIS indicated that only 16 residences would be impacted by noise. It appears that the condominiums and apartments with many residents may have been counted as one 'residence' rather than the numerous separate residents who live in those buildings. The Canterbury Shores alone has 90 units many with multiple residents, and this does not include the number of people living in Canterbury Shores or the other condominiums and apartments on the NE part of Madison Park.

C-029-008

**5) Environment: Error and Omission.**

Construction would destroy one beaver lodge. There are in fact three beaver lodges in the in the Arboretum area. One active lodge is in the footprint of the construction bridge

The SR 520, Medina to SR 202: Eastside Transit and HOV Project is a separate project with independent utility, a separate NEPA/SEPA environmental review process which was completed in 2010, a separate permit and approval process, and separate funding.

**C-029-004**

The purpose of the SR 520, I-5 to Medina project (see Section 1.2 of the SDEIS) is "to improve mobility for people and goods across Lake Washington within the SR 520 corridor from Seattle to Redmond in a manner that is safe, reliable, and cost-effective, while avoiding, minimizing, and/or mitigating impacts on affected neighborhoods and the environment."

FHWA and WSDOT developed the Preferred Alternative to reduce negative effects relative to the options presented in the SDEIS. Design refinements were based on recommendations of the ESHB 2211 legislative workgroup and on comments from the public, community groups and other stakeholder organizations, tribes, and local, state, and federal agencies. Please see Chapter 2 of the Final EIS for a description of the Preferred Alternative and Section 1.6 for more information on how community and stakeholder comments were considered in developing the Preferred Alternative.

**C-029-005**

Cost was not the only consideration in WSDOT's determination that retrofitting the existing bridge would not be a reasonable alternative for the SR 520, I-5 to Medina project. Please see page 3-7 of the 2006 Draft EIS, which states that the existing bridge "has had a number of safety and maintenance retrofits that have added weight to the structure. Because of the additional weight, the floating bridge sits 1 foot lower in the water than originally designed. Further major retrofits are not structurally feasible because they would add more weight than the bridge could safely support."

C-029-008

at the north east end of the Arboretum, between Broadmoor Golf Course and 520. Where would these beavers go? Given the construction will take up to seven years, there would be no local area where they could build a lodge. The SDEIS clearly states that there is no planned mitigation for the wildlife.

*The proposed project would remove a large beaver lodge in Union Bay adjacent to Foster Island, which would displace the animals, but is not expected to reduce the viability of the beaver population in this area. Operation of any of the options would have minimal effects on bald eagles and peregrine falcons. 5-140*

Not only are beavers present, there are nearby nesting eagles and heron whose feeding grounds are located at the northeast end of the Arboretum. The impact is just as dire in this area as it is for Foster Island and Marsh Island. What are the mitigation plans for destroying or replacing feeding grounds? Has this environmental impact been reviewed with the state Department of Fish and Wildlife? If not, that is an omission.

The SDEIS also states that new bridge will have an adverse impact on the wetlands area because of the shadow effect caused by the height and width of the new bridge. Given the fact that we live in an eco-system, what impact will the loss of the wetlands have on salmon and other fish? If we lose them do we lose other wildlife dependent on these feeding grounds—in the water and on land? The height and width of the bridge needs to be examined to mitigate the impact on remaining salmon runs to and from Puget Sound. What impact will the dredging have on salmon? Given that salmon are a major cultural and historic resource of the Pacific Northwest, we ask that WSDOT work with the state Fish and Wildlife Department to mitigate the impact of the bridge on fish and wildlife in and around Lake Washington.

*Wildlife and Habitat*

*There are no mitigation measures proposed specifically for wildlife. SDEIS, 5-146*

C-029-009

**6) East West vs. North South/impact on local traffic: Error and Omission**

Apparently, WSDOT did not work with SDOT to analyze the impact of the new design on traffic in the greater Seattle area. This needs to be addressed prior to construction. For example, WSDOT traffic analysis did not include a major intersection to and from 520: 23<sup>rd</sup> Ave. and Madison. Without examining and modeling traffic alternatives, traffic in Seattle has the potential of being adversely impacted with greater congestion on city streets.

The impact of the 520 design on traffic flows appears not to have been thoroughly addressed. The SDEIS itself indicates that congestion going north and south would have only marginal improvements. Unless North/South traffic flow is addressed and congestion resolved, that congestion will continue to have a negative impact on 520. Traffic cannot get on or off the new bridge because the north/south capacity is not adequate to 'absorb' an increased influx of cars.

Additionally, WSDOT concluded that a 4-lane alternative evaluated in the DEIS and Nelson/Nygaard report would not meet the project's purpose and need. The transportation analysis performed for the Draft EIS showed that while a 4-lane alternative would improve safety by replacing vulnerable structures and widening lanes and shoulders, it would not satisfy the project purpose of improving mobility in the SR 520 corridor. In 2010, WSDOT used an updated traffic model to evaluate a transit-optimized 4-lane alternative and a 4-lane alternative with tolling for congestion management, based on public comment. The results showed that these 4-lane alternatives would provide substantially lower mobility benefits than the 6-lane alternative for both general-purpose traffic and transit. Therefore, the 4-lane concepts were eliminated from further study. Please Chapter 1 of the Final EIS for a discussion of project alternatives, including why some alternatives were not studied further for the SR 520, I-5 to Medina project.

**C-029-006**

All structural components of the SR 520, I-5 to Medina project have been designed and reviewed by professional engineers with appropriate qualifications. In response to public comments on the SDEIS, the Preferred Alternative presented in the Final EIS includes noise reduction strategies that were not included in Option A, such as 4-foot concrete traffic barriers with noise-absorptive coating (see Chapter 2 of the Final EIS).

In comparison with the No Build Alternative, the Preferred Alternative would expose fewer residences to highway noise levels above the noise abatement criteria. Noise modeling conducted for the Final EIS shows that the Preferred Alternative would reduce noise effects the point that noise walls would not be recommended in the Seattle portion of the project, except potentially along I-5 in the North Capitol Hill area where the reasonableness and feasibility of a noise wall is still be

C-029-009

Local traffic operations along Montlake Boulevard NE and NE Pacific Street would improve with Option A compared to the No Build Alternative. Option A traffic patterns would improve operations at four intersections in the Montlake area and **degrade** operations at one intersection in the NE 45th Street interchange area and two intersections at the Rainier/Warvard interchange. Page 5-14

C-029-010

**7) Limited solution to larger problem: Error and omission**

While the purpose of the 520 design was to focus on the safety and capacity of 520, why were no other solutions examined other than an expanded bridge? A major impact would be to reduce the number of cars using 520. This could be accomplished in part with an expansion of park and ride sites on the East and West Sides. These lots would drive people to transit, not cars. Consider the difference between the East Coast vs. LA. The East Coast realized that it could not rely totally on cars for transportation. While they have a rail system we do not, creating park and rides now would accomplish two things—drive people to buses while we plan for rail and reduce traffic on the bridge more quickly. This has the advantage of adding jobs now as well.

C-029-011

Also, some of the comments from the Seattle King County Public Health Department report on the health impacts of 520 were not addressed. Their recommendations included interim traffic design changes, traffic management for the construction period and creating incentives for transit ridership. Why were these and other alternatives not explored?

C-029-012

**8) Lighting: Omission**

There is virtually no information on what the new lighting will look like, its location and impact. It was noted that lighting would be necessary for the pedestrian and bike lane. If there are higher signs and lights on 520, where will they be placed and what impact will the height of the lights have on neighboring communities?

C-029-013

**9) Health Impact: Omission.**

The Seattle King County Department of Public Health cited a number of health issues related to construction and noise. These were not addressed in the SDEIS:

- a) Particulate matter. This has not been addressed for the construction phase or post construction.
- b) Air quality. While air quality was addressed, there is no air quality, noise or particulate impact study on the impact of 8-14 foot noise barriers on the noise, air quality and particulate matter impact within those noise barriers.
- c) Vibrations from pile driving.

**10) Visual blight and health impact: Omission.**

If the number one finding from community participation was to “protect and enhance the neighborhoods,” then the Seattle King County Public Health Department’s Health Impact recommendations need to be examined in this regard. The 520 design with 8 to 14 feet noise walls would be a significant visual blight along the lake.

evaluated (see Section 5.7 of the Final EIS).

While noise analysts do recommend noise walls for areas in Medina, input from affected property owners and the community will determine whether recommended noise are constructed.

Quieter concrete pavement is included as a design feature for Option A, Option K, and the Preferred Alternative; however, because it is not an FHWA-approved mitigation measure and because future pavement surface conditions cannot be determined with certainty, it is not included in the noise model for the project.

**C-029-007**

The noise analysis performed for the SDEIS did consider individual condominium and apartment units as residences. The 23 receiver locations used in the SDEIS represent approximately 100 residences and residential equivalents in the Madison Park area. However, the analysis would not necessarily include all units in a specific building. For example, many units in the Canterbury Condominium building do not face the bridge and are shielding from traffic noise on SR520 by front line residences; therefore, residents of those units would experience noticeable lower noise effects than front line residents.

Measured noise levels taken at four locations in the Madison Park area agree, within 2 dBA, existing modeled noise levels from the FHWA Traffic Noise Model (TNM). In fact, the modeled noise levels were actually higher than measured noise levels, and therefore, the noise analysis is predicting worst case traffic noise levels. For reference, the average person would not notice a change of 2 dBA in traffic noise. It typically takes a 3 dBA change for most people to notice a change in traffic noise.

The Preferred Alternative includes noise reduction strategies such as 4-foot concrete traffic barriers with noise-absorptive coating (see Chapter 2

C-029-013

The bridge design must support the needs of the neighborhoods, not just the convenience of the WSDOT for bridge maintenance. The height of the proposed bridge at 20 feet above the water with an 8-14 foot concrete noise walls would be an incredible visual blight that impacts the quality of life of the boating community as well as the residential communities all around the lake.

These barriers, while reducing noise, would have an adverse impact on the health of people living near this bridge and an adverse impact on the economic vitality of the western corridor. It would lower property values and render economically viable communities vulnerable to the adverse impact of height, noise and quality of life we now enjoy.

The possibility of driving people out of these communities is real and significant. If the economic health of Seattle communities is not considered as a factor, this is a significant design omission.

C-029-014

**11) Safety: Error/omission**

a) Funding for Safety. The original goal of re-designing 520 was to improve the safety of the bridge. The first section of the SDEIS went to great lengths to talk about the imminent structural dangers facing 520 from storms to earthquakes. It went to great lengths to show its vulnerability to structural damage. More than twice the number of cars cross the bridge now than it was designed for. (SDEIS, 1-4 to 5).

However, the legislature and the Governor released funds the week of March 29 to the east side to begin construction. These were federally designated funds. Do they have the authority to do that? And, if so, where will the funds come from to replace that money for the safety upgrades?

If safety is the highest concern, it is not reflected in the SDEIS itself. Funding for safety upgrades need to be addressed.

C-029-015

b) Height of bridge. There are several safety concerns with the height of the bridge. One was addressed above re: concrete barriers and wind storms. Concrete is not flexible.

Another safety concern with the height of the new bridge is ice. If the proposed bridge is 25' plus feet above the water, compared to its' current 11 foot height, what impact would a winter storm have on the bridge? The height means there is more room for ice on and below the bridge deck. What plans does WSDOT have for snow and ice removal that would be both safe for drivers and environmentally safe as well?

C-029-016

**12) Cost over runs? Who pays the bill?**

Finally, it is not clear who pays the bill. Where will the money come from *specifically*, and who will have to foot the bill if there are cost overruns? If the

of the Final EIS). The noise reducing effects of the barriers and increased distance between the bridge and noise sensitive properties combine to reduce noise levels to below the WSDOT and FHWA noise abatement criteria at all residences in the Madison Park area. Quieter concrete pavement is included as a design feature for Option A, Option K, and the Preferred Alternative; however, because it is not an FHWA-approved mitigation measure and because future pavement surface conditions cannot be determined with certainty, it is not included in the noise model for the project.

Please see Section 5.7 of the Final EIS and the Noise Discipline Report Addendum (Attachment 7 to the Final EIS) for detailed information regarding noise effects of the Preferred Alternative.

**C-029-008**

Natural resource mitigation commitments for the SR 520, I-5 to Medina project have been developed through close coordination with federal, state, municipal, and tribal resource agencies. This coordination was accomplished first through individual, topic-specific technical working groups which were consolidated into the Natural Resource Technical Working Group (TWG) in June 2010. The Natural Resource TWG was a comprehensive forum for regulatory agencies to discuss project effects and mitigation. It evaluated potential project effects on wetlands, aquatic species and habitats, and wildlife and determined appropriate mitigation measures. Please refer to the Conceptual Wetland Mitigation Plan and the Conceptual Aquatic Resources Mitigation Plan (in Attachment 9 to the Final EIS) for details. In addition, WSDOT and the City of Seattle determined suitable mitigation for project effects on upland wildlife habitat during the shoreline permit process.

ESSB 6392 directs WSDOT to develop a mitigation plan for the Washington Park Arboretum. Final recommendations from the ESSB 6392 workgroup include design modifications to minimize project effects

C-029-016

money for safety improvements for 520 has now been given for improvements on the east side, does this mean the east side is off the hook if there are overruns on the west side? By starting on the east side first, rather than last, as indicated in the SDEIS, their work will have been well into completion by the time the floating bridge work and the western interchanges will have been started or completed. Does that leave Seattle holding the bill? And if so, where will that money come from? From property taxes on homes whose values have been negatively impacted by the bridge itself?

C-029-017

In conclusion: There are significant errors and omissions in the SDEIS, changes in the process and priorities, and sequencing of construction from that outlined in the SDEIS itself. These issues need to be addressed before we move forward with any construction—east side or west side.

We recognize the importance of moving ahead. We also recognize significant structural and capacity issues remain and need to be addressed. We look forward to a good faith effort to work with SDOT and WSDOT to create a stable, safe and environmentally 'friendly' bridge and a construction process that has minimal impact on the quality of life in Seattle. We look forward to creating a final design that addresses these important issues so the adjoining communities have a voice in the impact of the bridge on effective transportation and vibrant neighborhoods.

Sincerely,

Ken Myrabo, President, Madison Park Community Council, on behalf of the Madison Park Community

Cc: Governor Christine Gregoire  
County Executive Dow Constantine  
Senator Ed Murray, Representatives Chopp and Pedersen  
Mayor Mike McGinn  
King County and City Council Members  
Senators Murray and Cantwell, Congressman McDermott

on the Arboretum as well as an Arboretum Mitigation Plan (Attachment 9 to the Final EIS). Also see the ESSB 6392: Design Refinements and Transit Connections Workgroup Recommendations Report (Attachment 16 to the Final EIS) for more details.

Regarding the specific concerns raised in this comment, the responsible agencies consider the beaver to be an urban-adapted species; it is not listed as Threatened or Endangered under the Endangered Species Act and is not a state-priority species. While exercising due care to minimize project effects on beaver habitat, WSDOT will not provide mitigation for lost beaver habitat. With regard to salmonid species, WSDOT has developed site-specific in-water work windows in coordination with federal and state agencies and tribal organizations to minimize potential effects on salmon during sensitive periods. Please see Section 5.11 of the Final EIS; the Ecosystems Discipline Report Addendum (Attachment 7 to the Final EIS); and the Conceptual Wetlands and Conceptual Aquatic Mitigation Plans (Attachment 9 to the Final EIS), for detailed descriptions of natural resource mitigation measures.

[REDACTED]

C-029-010

Please see the response to comment C-029-005 for information regarding 4-lane alternatives and Chapter 2 of the Final EIS for a discussion of project alternatives, including why some alternatives were not studied further. Although the expansion of park-and-ride lots are not currently a part of the SR 520, I-5 to Medina project, grant funding and additional federal support under the Urban Partnership Program are anticipated to fund fleet expansion and capital improvements such as park-and-ride lot expansions, improvement of key bus stops, and installation of real-time information signs.

**C-029-011**

The Health Impact Assessment for the SR 520, I-5 to Medina project recommends measures that could be undertaken to improve the region's quality of health, rather than attributing specific health outcomes to the project itself. However, protecting human health is one of the reasons behind many of the studies conducted in the preparation of an EIS.

Please see Attachment 7, Discipline Reports, of the Final EIS for more information. The Recreation Discipline Report Addendum identifies project-specific construction effects on bicycle and pedestrian trails, and the Final Transportation Discipline Report discusses construction effects on nonmotorized transportation facilities. As described in the Health Impact Assessment (please see Attachment 14 to the Final EIS), while some bicycle and pedestrian trails would be closed temporarily during project construction, the completed project would improve long-term opportunities for bicycle and pedestrian recreation by providing a bicycle/pedestrian lane on the floating bridge with connections to regional trails. Please see Chapter 2 of the Final EIS for more information.

**C-029-012**

Please see Section 5.5 of the SDEIS for a discussion of lighting and glare effects on specific areas as a result of the project. Please also see Chapter 5 of the Final EIS for updated information. Depending on the location, some residents may experience more illumination than at present, primarily due to the removal of mature vegetation during construction. These effects would diminish over time as vegetation is reestablished. With the Preferred Alternative, the floating bridge would have recessed, low-wattage, downcast lamps located along the bike/pedestrian path. Design details affecting lighting locations and aesthetics will be determined later in the design process, during project permitting. Lighting for the SR 520, I-5 to Medina project will meet all FHWA safety standards.



**C-029-013**

Please see the response to comment C-029-011 regarding the relationship of the Health Impact Assessment to NEPA and the EIS for the SR 520, I-5 to Medina project. Particulate matter effects of the project would be the same as dust effects, which were discussed throughout the SDEIS. The air quality effects presented in the SDEIS and the Air Quality Discipline Report are worst-case scenarios, and noise walls are not expected to have an increased negative effect than what is presented. Please see the response to comment C-029-006 for information on noise walls with the Preferred Alternative.

For previously published and updated information on vibration effects from pile-driving, please see the Noise Discipline Report Addendum (Attachment 7 to the Final EIS).

**C-029-014**

As described in Chapter 1 of this Final EIS, funding for the floating bridge—the most vulnerable portion of the SR 520, I-5 to Medina corridor—has been secured, and WSDOT has solicited proposals for construction of this portion of the project. Chapter 1 also describes construction sequencing for the project, which allows several years for full funding to be obtained through a variety of state and federal sources. Thus, funding and construction of the SR 520, Medina to SR 202 project does not preclude the Preferred Alternative or any other alternative for the SR 520, I-5 to Medina project. Further, the SR 520, Medina to SR 202 project was identified as a separate NEPA action in 2008 and funding was approved as a separate budget item through legislative action and Governor Gregoire's approval as part of the 2009 supplemental budget.

WSDOT's latest project plans for the SR 520, I-5 to Medina project, including the Preferred Alternative, are within the \$4.65 billion program budget. Governor Gregoire and the Washington State Legislature have secured a variety of state and federal funding sources to help pay for the

SR 520 Program. Additional information about the SR 520 Program Finance Plan can be found on the project website at:  
<http://www.wsdot.wa.gov/Projects/SR520Bridge/financing.htm>.

**C-029-015**

The new bridge will be built in accordance with all FHWA safety regulations. Plans for maintenance of the bridge will be determined following the permitting process.

**C-029-016**

Full construction funding that has been identified for the Floating Bridge and Landings portion of the SR 520, I-5 to Medina project has contingency and risk dollars built into the budgets to cover cost overruns. This contingency is built into the cost estimating and budgeting process (CEVP) through comprehensive risk analysis that was updated for the SR 520: Bridge Replacement and HOV Program in 2010. In short, the project has funding to pay for cost overruns to the extent that potential issues are identified in the comprehensive risk analysis.

WSDOT projects enter into the construction phase with full funding that includes contingency and risk reserve budgets for overruns. The SR 520, I-5 to Medina project is a State project and the City of Seattle is not responsible for the cost or delivery of the project, and would therefore not be responsible for funding any overruns.

For more information regarding project funding, please see the response to comment C-029-014 as well as the SR 520 Program Finance Plan available at:  
<http://www.wsdot.wa.gov/Projects/SR520Bridge/financing.htm>.

**C-029-017**

The Final EIS presents information on mitigation measures for operation and construction effects of the Preferred Alternative. The analysis documented in the Final EIS is consistent with the level of detail required by NEPA and with applicable federal, state, and local laws and regulations. As design of the SR 520, I-5 to Medina project progresses, WSDOT will continue to define mitigation measures in accordance with ESSB 6392 and through coordination with applicable federal, state, and local agencies during the permitting and approval process.