Jonathan Dubman 2014 E Calhoun St. Seattle, WA 98112

April 15, 2010

#### Jennifer Young:

**c-036-001** The Montlake Community Council has actively participated in every planning process related to SR 520. Our constructive engagement with WSDOT led to the development of the Pacific Street Interchange plan, which our neighborhood endorsed. We participated in the Local Impact Committee co-sponsored by WSDOT and the City of Seattle, then the Stakeholder Advisory Committee, the ESSB 6099 mediation process and now this SDEIS process.

Our community has sponsored numerous public meetings and forums to assess community views on the alternatives. We have attended dozens of executive, advisory and technical committee meetings sponsored by WSDOT. Volunteers have worked tirelessly to keep informed on project developments and to share their views with all of the members of our neighborhood through regular monthly meetings and through special meetings. Our active membership has contributed articles in both the paper and online version of our Montlake Flyer. We have worked in good faith with WSDOT to develop alternatives that support regional mobility goals for the 520 corridor and that respect the natural and human environment of the Montlake Neighborhood.

We have also actively supported and participated in the work of the Coalition for a Sustainable 520. Their comments to you have been thoroughly reviewed by our transportation committee. We support them all. The Coalition supported Plan K and more recently the modification to it called Plan M. Their recommendation to study a lower impact four-lane design with tolling is critical. We agree with their thoughtful recommendations.

C-036-002 We have been very concerned that the EIS process has been subverted by announcements of a quasi-official selection of Plan A+. The SR 520 Legislative Workgroup announced its preferred alternative recommendation before this SDEIS was issued, and the common assumption in the Washington State Legislature appeared to be that their decision was a meaningful one. The study of Plan M, an much less costly alternative to Plan K with lower construction impacts and potentially lower overall environmental impacts, was abruptly concluded before a thorough, objective analysis of its feasibility could be done. There appears to have been haste to terminate this process despite clear messages that have been delivered along that way that none of the Plan A variants was acceptable to our community.

**c-036-003** There are deep and widespread concerns about the divisive effect the "A suboption" (or "A+" or any of the A plans) will have on this historic residential neighborhood, because of the size of the interchange and a dehumanized lid environment that contains ramps, roads and vehicle trenches. The traffic volume on Lake Washington Blvd. is of great concern not just to the Arboretum, and not just to the many Montlake neighbors along that street, but to all in our community and in the city who desire to access the Washington Park Arboretum via any means other than driving there. The only bicycle route heading south from Burke-Gilman trail, the UW rail station, and the proposed SR 520 regional trail goes through alleys in Montlake. We have an opportunity with the portion of Lake Washington Blvd. near SR 520 to realign the highway and reconfigure its right of way, perhaps to provide bicycle lanes along LWB, or a separated bicycle facility; perhaps using a pair of one-way couplets that might be more

Since the SDEIS was published, FHWA and WSDOT have identified a Preferred Alternative that is similar to Option A but incorporates design refinements that are responsive to community and stakeholder comments on the SDEIS. The modifications included in the Preferred Alternative are intended to minimize or reduce the effects presented in the SDEIS. Please see Chapter 2 of the Final EIS for a description of the planning process and the Preferred Alternative.

# C-036-002

WSDOT did not develop the Preferred Alternative until after the SDEIS comment period closed and until the governor, legislators, WSDOT, and FHWA had reviewed a report on the comments received from the public. The distinguishing features of the Preferred Alternative are based on, and responsive to, public comment on the SDEIS.

To identify the Preferred Alternative, WSDOT considered comments from agencies, tribes, and the public, as well as the findings of the legislative workgroup authorized by ESHB 2211. The decision followed many years of study, including the Westside mediation process described on pages 1-17 through 1-19 of the SDEIS and pages 36 through 43 of the SDEIS Agency Coordination and Public Involvement Discipline Report. Please see Chapter 1 of the Final EIS for a discussion of what has happened since the SDEIS was published and more information about how and why the Preferred Alternative was identified.

# C-036-003

The lids included with the Preferred Alternative would create open space, restore or create views and enhance bicycle and pedestrian movement in the area. They would also reduce the visual and noise effects from the SR 520 corridor, and would reconnect neighborhoods and parkways that were severed by construction of the original SR 520. Although the Montlake lid will include bus stops as mentioned in the

- **c-036-003** pedestrian friendly. There are many possibilities, but what is shown in this DSEIS is a plan that does not work for our community; we do not believe that Plan A (without LWB ramps) will be built because of its traffic flaws; Meanwhile, the alternative has highway ramps running through the middle of it. Neither is an acceptable plan for our community.
- C-036-004 Montlake is surrounded by parks from Foster Island to North Capitol Hill. This string of parks was once linked together to form a continuous green space enjoyed by all; the construction of SR 520 took jewels out of this emerald necklace. Yet the A plans theaten to further degrade this open space network and to miss this historic opportunity to restore connections between them.
- **C-036-005** Meanwhile, the very essence of our community, the historic Montlake Bridge, the symbol of our neighborhood the views of it, and from it and of the historic ship canal, the very special elements that make our community what it is, are all threatened in the A plans. The bike and pedestrian corridor so critical to accessing the University and its future rail station from the south are jeopardized by the giant interchange

The existing bridge is both a gateway to our community and to the University of Washington and the experience of viewing it or crossing it must not be disturbed. The importance of protecting the view corridor for the Montlake Bridge equates with the University of Washington's protection of the Rainier Vista view corridor.

**C-036-006** We would like to see options evaluated that do not affect the vicinity of the Montlake Bridge and do not construct any new drawbridges in the corridor. We would like to see options evaluated that do not contain any slip ramps, that minimize the walk distance from bus to rail at the UW for both local and regional buses, that limit the traffic in front of residences on Lake Washington Blvd., that use tolling creatively to manage traffic, that incorporate a southbound HOV lane on Montlake Blvd. from approximately 45<sup>th</sup> St. to approximately Pacific St. for transit reliability and emergency vehicle access, that have less than 7 and preferably 5 or 4 lanes across Portage Bay, and that restore the access to buses traveling between downtown and the Eastside, and that allow for the addition of light rail without reconstructing the bridge or its approaches.

Finally, we want to see the full and fair evaluation of both a four-lane alternative and a fourlane plus dedicated transit alternative that use congestion pricing and other tools to manage travel demand on all of the lanes that vehicles are allowed to use, thus potentially avoiding the need for separate HOV lanes, with all the attendant costs and impacts, which are, as many are pointing out, very significant.

Thank you for the opportunity to comment. We look forward to participating in the next phase of this process.

Respectfully yours,

Jonathan Dubman board member, Montlake Community Council chair of SR 520 Committee

in consultation with Rob Wilkinson, SR 520 Committee, and Anita Bowers, President of the Montlake Community Council

comment, WSDOT has collaborated with the City of Seattle and its pedestrian and bicycle advisory boards, King County Metro Transit, and Sound Transit to refine components. This coordination, part of the requirements of ESSB 6392, resulted in a set of recommendations for design refinements to improve the pedestrian, bicycle and transit environment. The suggested design refinements are included in the ESSB 6392: Design Refinements and Transit Connections Workgroup Recommendations Report (please see Attachment 16 to the Final EIS).

Under the Preferred Alternative, the removal of the Lake Washington Boulevard ramps would reduce traffic volume and congestion on the portion of Lake Washington Boulevard within the Arboretum, compared to the No Build Alternative. Additionally, WSDOT has committed to fund traffic calming measures along Lake Washington Boulevard and to work with the Seattle Department of Transportation on further measures to manage traffic in the Arboretum.

The Recreation Discipline Report Addendum (Attachment 7 to the Final EIS) discusses the bicycle and pedestrian paths included in the Preferred Alternative. Although there is no bicycle lane proposed connecting the Burke-Gilman Trail and SR 520, there are connections via arterial streets and non-arterial streets commonly used by bicyclists. Please see Chapter 6 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for information on local street volumes and Chapter 7 for information regarding project effects on nonmotorized transportation.

### C-036-004

It is outside the scope of the project for WSDOT to create or enhance open space or parkland except in cases where such resources are affected by the project. However, with input from communities in the project area, the project design has been further refined in the Preferred Alternative to address the recreational and connectivity needs of

surrounding neighborhoods. For instance, the Montlake lid would be expanded to connect to the Washington Park Arboretum and would provide open space and new neighborhood connections. Using Section 4(f) and Section 6(f) guidelines, WSDOT will continue working with the City of Seattle and other agencies to identify project effects on recreation and to determine the appropriate mitigation for those effects. Mitigation measures for the unavoidable use of Section 4(f) properties and conversion of Section 6(f) properties are listed in the Final Section 4(f) Evaluation (Chapter 9 of the Final EIS) and the Section 6(f) Summary (Chapter 10 of the Final EIS).

# C-036-005

The Preferred Alternative includes a new bascule bridge across the Montlake Cut that would provide additional capacity for transit and highoccupancy vehicles, bicycles, and pedestrians. Each bridge would have three travel lanes: the existing bridge would serve southbound traffic, and the new bridge would serve northbound traffic. In addition to the three travel lanes (two general purpose and one HOV), the new bridge would provide additional capacity for bicycles and pedestrians across the Montlake Cut. Connection between the University District and Montlake would be improved by the new bridge and the new pedestrian and bicycle amenities on the Montlake lid.

As stated in the Cultural Resources Discipline Report (Attachment 7 to the SDEIS), the design of the new bascule bridge will be context sensitive to minimize its effects on the setting and feeling of the historic Carl F. Gould Montlake Bridge. Detailed stipulations in the Section 106 Programmatic Agreement will ensure that any effects resulting from the new bascule bridge and its proximity to the existing bridge are mitigated. For more information, please see the Final Cultural Resources Assessment and Discipline Report in Attachment 7 to the Final EIS. Also see the Visual Quality and Aesthetics Discipline Report Addendum

(Attachment 7 to the Final EIS) for visualizations of the new bridge from key viewpoints.

# C-036-006

If new reasonable alternatives are proposed in comments on a draft environmental document, NEPA requires that they must be fully analyzed. Chapter 2 of the Final EIS contains further analysis and discussion of the project alternatives, including the Preferred Alternative developed after the SDEIS was released for public review and comment. The Preferred Alternative does allow for future light rail without needing to reconstruct the floating bridge or its approaches; however, stability pontoons would be required to support the added weight of light rail. Section 2.4 of the Final EIS explains why initial implementation of light rail transit on SR 520 is not a reasonable alternative.

The transportation analysis in the DEIS showed that while a 4-lane alternative would improve safety by replacing vulnerable structures and widening lanes and shoulders, it would not improve mobility in the SR 520 corridor. In 2010, responding to public comments regarding a transit-optimized 4-lane alternative or a 4-lane alternative with tolling for congestion management, WSDOT reevaluated these potential alternatives using an updated traffic model. The results showed that the 4-lane alternatives would provide substantially fewer mobility benefits than the 6-Lane Alternative for both general-purpose traffic and transit. Therefore, the 4-lane concepts were eliminated from further study. Section 2.4 of the Final EIS contains a discussion about why these alternatives are not being studied further for the SR 520, I-5 to Medina project.