From: Bill LaBorde [mailto:bill@TransportationChoices.org]
Sent: Thursday, April 15, 2010 11:52 PM
To: SR 520 Bridge SDEIS
Subject: Transportation Choices Coalition 520 comments

Please find attached a .pdf with the Transportation Choices Coalition comments on the SR 520 SDEIS.

Thank you,
Bill

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Attention: SR520 Bridge SDEIS Comments
Jennifer Young
Environmental Manager
SR 520 Program Office
600 Stewart St., Suite 520
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VIA E-MAIL

April 15, 2010

Dear Ms. Young:

C-039-001

Thank you for the opportunity to comment on the Supplemental Environmental Impact Statement for the SR 520, I-5 to Medina Bridge Replacement project. Transportation Choices Coalition has a long history with this project, serving on the Trans-Lake Corridor Study Committee in the late 90s on through to the Mediation process in 2008. Throughout the development of SR 520 plans, we have consistently focused on the need for variable tolling to manage congestion on the corridor as well as fund much of the project itself; a robust transit mitigation plan for the construction phase followed by a *funded* transit plan for the corridor once the bridge becomes operational; and safe and sufficient bicycle and pedestrian access across the bridge and North/South through the Montlake interchange area. We also have consistently advocated for flexible use of tolling revenue to fund transit and other alternatives to driving across the bridge. These are the issues on which we will focus our comments on the SDEIS.

Design Alternatives

At this point, Transportation Choices Coalition does not feel it is constructive to weigh in favorably toward one alternative over another. We believe stakeholders are much closer to a consensus position on 520 than is commonly appreciated. While alternative options are presented in the SDEIS, most stakeholders are essentially working from the same template – variations of the A+ plan. We are really only left with a few, but important, details to work out.

C-039-002

Adaptability to Light Rail

The biggest design question that remains is how we will accommodate the region's inevitable desire to extend light rail across the 520 corridor at some point in the future. While we strongly support the regional consensus we are now proceeding on to build light rail across I-90 first, we know that metropolitan areas with mature, fully developed rail transit systems don't just have one line or two lines. Portland MAX, which started operations 24 years ago, now operates four lines. The 16 year

C-039-001

Since the SDEIS was published, FHWA and WSDOT have developed a Preferred Alternative that is similar to Option A, but incorporates design refinements that respond to public and agency comments on the SDEIS. In addition, as part of the Engrossed Substitute Senate Bill (ESSB) 6392 process, WSDOT and the City of Seattle co-led a joint design refinements and transit connection workgroup effort that included King County Metro Transit and Sound Transit. The responses to comments C-039-002 through C-039-012 provide more information on how the Preferred Alternative and the ESSB 6392 workgroup have addressed the topics raised in the Transportation Choices Coalition's comments.

C-039-002

WSDOT has worked with Sound Transit since 2003 to design for future rail compatibility in the corridor. As noted in the comment, the April 2010 Nelson/Nygaard report identified several changes to the SDEIS options that were believed to be necessary to "meet the mayor's goal of an SR 520 bridge that is readily convertible to rail." Although WSDOT believed that the design had already achieved this goal, it continued to work with the City of Seattle and Sound Transit to identify changes that would enhance the corridor's future rail compatibility. The Preferred Alternative reflects these design changes and is compatible with 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 Montlake Boulevard to exit, or they could use 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. WSDOT narrowed the gap across Foster Island to reduce the project's footprint in this sensitive area, but trains could use the gap west of the island to turn north to the University Link station.

C-039-002

old Denver system has four lines and is growing. DC, Boston, San Francisco, Los Angeles have 5,6,7 lines criss-crossing each other throughout their respective regions.

These light rail development patterns should make it obvious that at some point we will want to take advantage of the SR 520 crossing to provide additional rail transit options for this region. Therefore, we believe it should be a very high priority of the state to not preclude forever the possibility of light rail on this bridge without alterations that would be unrealistic in terms of cost or disruption of operations. Adding significant extra width to the bridge to accommodate light rail in addition to a 6-lane bridge will be no easier in the future than it is today. People who live in Montlake or enjoy sanctuary in the Arboretum in the future will still care about the footprint of the bridge and will not easily accept additional width to accommodate light rail. Now is the time to get the design right and ensure we can operate light rail on that bridge within the 6-lane configuration.

Looking at the Nelson/Nygaard report commissioned by the Seattle Mayor's Office, it appears that there are three key issues for adapting the bridge for light rail within the existing 6-lane configuration – number of pontoons, width of the bridge and a gap between the north and south lanes around Foster Island to accommodate trackway diverging away from roadway as it enters the city. According to the city consultants, additional pontoons can be added later and the bridge has a width that could eventually accommodate light rail according to the same standards by which light rail will travel on I-90 (This may also require some reconstruction of the bike lane in the future to accommodate the heavier bicycle traffic likely to be seen on the 520 crossing). It appears that the only critical issue that must be addressed now for the bridge to eventually serve light rail is a redesign of the Foster Island approach. While this redesign may require some additional environmental and engineering work, we believe that WSDOT can make up for this time through adjustments to the phasing and that other Westside design changes desired by the city will allow WSDOT to still deliver the project within roughly the same timeline and project budget. A bridge that can eventually serve light rail in the city's and region's interests and should not be foreclosed by a state rushing the final stages of planning and engineering.

C-039-003

HOV Capacity and Transit Operations
With the corridor expected to carry 27-28,000 people per day by bus by 2030, that means 500-600 buses will be running across the bridge each weekday by 2030. This is BRT level service and demands the kind of dedicated roadway associated with BRT. For sake of the very functionality of SR 520 as a transit corridor, and given that tolling is likely to drive a significant increase in transit service to the bridge over time, we urge WSDOT to open the bridge with lanes 5 and 6 dedicated solely for transit service. At the very least, the bridge should be operated according to a corridor management plan that automatically triggers increasing HOV standards as speeds in the HOV lanes fall below 45 mph more than 5 percent of the time during peak hours as measured on at least a quarterly basis.

- Option 2: Add light-rail-only lanes. This approach could provide several connections—via a high bridge, a drawbridge, or a tunnel, as suggested in the Nelson/Nygaard report—to the University Link station. It would make similar use of the 40-foot gap between eastbound and westbound lanes to allow trains to turn north to the University Link station.

As the comment states, the additional weight of rail infrastructure and vehicles would require supplemental floating bridge pontoons if the regional decision to implement light rail were made and funded. Such a decision would need to be planned and programmed by regional land use and transit agencies, funded by a public vote, and evaluated in its own environmental analysis.

C-039-003

HOV lanes give priority to both transit and carpools, providing efficient non-SOV choices to travelers while maintaining effective utilization of the public roadway. The HOV lanes will help buses operate at consistent speeds and maintain schedule reliability, which are two characteristics of several associated with BRT and transit quality of service in general. As with any transportation investment, analysis of the unique characteristics of the SR 520 corridor was required to evaluate how the transportation system will operate.

The transportation analysis was performed using the assumption that use of the HOV lane would require 3 or more people in a vehicle. ESHB 6392 also specifies that the HOV lane will be available only for vehicles with 3 or more passengers and stipulates that the legislature be informed when HOV lane speeds drop below 45 miles per hour more than 10 percent of the time. The 3 person occupancy assumption was included in the Draft EIS, SDEIS, and Final EIS, resulting in free-flow operations in the HOV lane with bus service levels near 600 vehicles per day. Although a specific corridor management plan for SR 520 does not exist,

C-039-004 WSDOT has come a long way in integrating transit into their megaproject plans. Yet, whether it is with this project, the SR 99 tunnel project or I-405, the state has failed to adequately address the funding of that transit service. 520 already sees high transit use and, as the SDEIS notes, with tolls and more predictable travel times on the corridor, transit usage will increase dramatically. We believe the final EIS needs to adequately address the funding of that service. Tolling revenue is an obvious source to fund adequate transit service. A toll surcharge may be another option. Additionally, revenue from early tolling of the existing bridge can fund transit mitigation.

C-039-005 Beyond basic functionality of the corridor, reliable and affordable transit options are the only way we can address the economic justice concerns that come with high bridge tolls. Too many service workers, grocery store employees and single-earner families will simply not be able to afford a $6 or more daily bridge toll. The SDEIS acknowledges that "low-income populations would experience disproportionately high and adverse effects as a result of the tolling." SDEIS 5-49. Reliable and frequent transit service would mitigate these impacts for most. The Final EIS should address funding for transit service to address social justice concerns for both the early tolling phase and once the bridge enters operations.

C-039-006 Finally, transit mitigation for the construction period is not well defined in the SDEIS. A specific mitigation plan, with phasing and a budget to pay for transit service should be spelled out in the Final EIS.

C-039-007 **Montlake Area Transit Access**
We support the Seattle City Council's request for a series of transit access improvements throughout the Montlake Blvd. corridor, extending from Pacific Ave to the north and Madison Ave at the southern end. Montlake will continue to be a key transit link for bus commuters coming from the Eastside and heavy transit using Seattle neighborhoods like the Central District, East Capitol Hill and Montlake itself as they access the light rail system at UW and other parts of NE Seattle. Transit prioritization also reduces the need for harmful Arboretum ramps. Montlake transit improvements should include signal prioritization, including queue jumps between the 520 interchange and Pacific Ave. This area should also include transit only lanes to facilitate quick passage of buses through auto gridlock created by the dumping of cars from the bridge during peak hours and when the Montlake Bridge is frequently drawn for boat passage.

C-039-008 **Bicycle and Pedestrian Safety**
Bicycling and walking are a common means of transportation, as well as exercise, in the Montlake/UW area. The Montlake East-West corridor is already a critical pathway for bicycles and pedestrians traveling between neighborhoods south of the ship canal and the University of Washington, and between the Burke-Gilman Trail and Lake Washington Blvd. Non-motorized traffic will likely increase significantly with the new SR 520 bikeway connection and the presence of the Husky Stadium

the state's HOV lane operations policy described in the WSDOT Design Manual Chapter 1410 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.

C-039-004

By law, tolls collected from SR 520 users, including both tolling of the existing bridge under ESSB 2211 and tolling following completion of the new bridge, can be used only for SR 520 improvements, operations, and maintenance. Redirecting tolling revenue to support transit service would require legislative changes that are unlikely in the foreseeable future. However, the inclusion of HOV lanes and the project's forward compatibility with light-rail infrastructure will support transit optimization in the SR 520 corridor.

For more information on tolling, please see Section 1.11 of the Final EIS and the SR 520 program costs, funding, and tolling information available at http://www.wadot.wa.gov/Projects/SR520Bridge/financing.htm.

C-039-005

Since publication of the SDEIS, WSDOT and its federal, state, and local transit agency partners have committed to implementing measures to address the effects of tolling in general, as well as tolling of the SR 520 bridge, on low-income populations. As discussed in the Environmental Justice Discipline Report Addendum (in Attachment 7 to the Final EIS), these include measures such as investing in targeted transit improvements and conducting additional public outreach regarding tolling. The Addendum also notes that, with these measures in place, the project would not generate adverse effects to LEP populations from tolling, and therefore no mitigation is proposed.

C-039-008 Light Rail station. With all this non-motorized traffic having to cross a major freeway interchange, the opportunities for accidents are enormous. The safety of bicyclists and pedestrians must be paramount in designing the new bridge and interchange. On the entirety of the 520 corridor, all bicycle and pedestrian facilities should be designed to meet City of Seattle standards to assure safe entrance and exit from the bridge trail, provide room for passing, allowing cyclists to avoid road debris from being kicked up in their faces while also allowing enough room so that cyclists do not get blown into each other when strong winds gust across the bridge.

C-039-009 Ramp intersections should be narrowed, eliminating slip ramps to allow for safer crossings of the 520/Montlake intersection by bicyclists and pedestrians. A lid should be added between Montlake Blvd and 24th Ave. East that would make it safer to bicyclists and pedestrians traveling from Lake Washington Blvd and the Arboretum and neighborhoods east of 23rd to easily avoid the most dangerous part of the Montlake interchange. Along Montlake Blvd itself, the 520 project should include landscaping, pedestrian design features, bike lanes, appropriate lighting and signage to slow down auto traffic leaving and entering the 520 interchange while also making the boulevard inviting for pedestrians and bicyclists.

C-039-010 **Health Impact Assessment**
Beyond bicycling and pedestrian infrastructure, we want to reiterate our support for the conclusions of the SR 520 Health Impact Assessment jointly authored by the Puget Sound Clean Air Agency and Seattle-King County Health Department. These recommendations include measures to reduce construction-related noise and air pollution; connected non-motorized corridors; wayfinding systems; well-designed landscaping throughout the corridor and especially on lids and in areas used by pedestrians and bicyclists; public art and esthetic design measures where roadway intersects with walkways and neighborhoods; and innovative stormwater management practices to minimize run-off of vehicle related pollution into Lake Washington.

C-039-011 **Mitigation for Neighborhoods**
With expansion of the 520 highway from four lanes to six, most Montlake and Roanoke residents are getting more than they bargained for when first arriving in the neighborhood. WSDOT should actively work with neighbors to mitigate noise, visual impacts and air pollution. WSDOT should especially defer to neighbors, as well as the City and bicycle and pedestrian groups, in designing lids to ensure they will serve as assets to neighbors long into the future.

C-039-012 **Impacts on the Arboretum**
We believe that the Arboretum ramps should either be removed, or if they are found to be necessary for transit access, then traffic restrictions, pricing or traffic management systems should be in place to ensure the Arboretum is no more, and hopefully less, impacted by traffic from 520 than it is today.

Additional transit service has been planned, funded and/or implemented that would enhance travel choices for low-income users of SR 520. Key examples in the SR 520 travelshed area are King County Metro's Transit Now! program, new transit services and facilities funded through the Urban Partnership Agreement, and future Sound Transit East Link service. Based on the additional availability of transit in the corridor and intensive outreach efforts by WSDOT to help low-income people better understand their tolling and transportation choices under the Lake Washington Congestion Management Project, the Environmental Justice Discipline Report Addendum (Attachment 7 to the Final EIS) concludes that the project would not have a disproportionately high and adverse effect on low-income populations.

C-039-006

In the SDEIS, WSDOT described the anticipated effects of SR 520, I-5 to Medina project construction on transportation at a level of detail appropriate for comparison of the design options. WSDOT is engaged in ongoing coordination with transit agencies, including King County Metro Transit, and will continue this coordination to develop a plan for managing the project's effects on transit during construction. This will be part of the overall construction traffic management plan that will be developed in conjunction with more detailed construction plans. Please refer to Chapter 10 of the Final Transportation Discipline Report (Attachment 7 to the Final EIS) for more information about transportation operations during construction. WSDOT will continue to coordinate closely with transit agencies during construction to maintain the best possible service for riders.

C-039-007

The Preferred Alternative includes many features to optimize transit in the Montlake Boulevard corridor near the SR 520 interchange. These include HOV direct access ramps to and from the east; HOV lanes on Montlake Boulevard NE between the Montlake interchange area and NE

C-039-012

Again, we thank you for the opportunity to weigh in on this well thought out and detailed SDEIS document. We look forward to continuing our involvement with the project and someday in the not too distant future seeing these efforts come to fruition.

Sincerely,

Bill LaBorde
Policy Director
Transportation Choices Coalition

Pacific Street, where the future Montlake Multimodal Center is planned; and transit stops on the Montlake Boulevard lid. These facilities, along with the travel time and reliability improvements provided by completing the SR 520 HOV lane system, would support transit agencies in their delivery of future bus rapid transit service in the SR 520 corridor.

The ESSB 6392 workgroup also considered priority treatments for transit in the SR 520, I-5 to Medina 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 future Montlake Multimodal Center. Additional transit priority treatments beyond those included in the SR 520, I-5 to Medina project could be implemented by the City of Seattle and King County Metro Transit. Please see the ESSB 6392: Design Refinements and Transit Connections Workgroup Recommendations Report in Attachment 16 to the Final EIS for more information.

C-039-008

In accordance with the requirements of ESSB 6392, WSDOT has worked collaboratively with the City of Seattle Department of Transportation, the City of Seattle Pedestrian Advisory Board, and Seattle Bicycle Advisory Board to develop design refinements for bicycle and pedestrian facilities. The Preferred Alternative in the Final EIS includes a revised and expanded Montlake lid that would improve bicycle and pedestrian connectivity across SR 520, reduce crossing distance for many pedestrians, and improve pedestrian safety. Bicycle connections would be improved by addition of a regional trail across the floating bridge; an undercrossing beneath SR 520 between the Washington Park Arboretum and East Montlake Park; and an undercrossing beneath Montlake Boulevard connecting the new regional trail to the Bill Dawson Trail. Please see Chapter 2 of the Final EIS for descriptions of the bicycle and pedestrian paths and connections that are part of the SR 520, I-5 to Medina project. An additional improvement recommended by

the ESSB 6392 workgroup that would be under the jurisdiction of the City of Seattle is a connection between the regional trail on SR 520 and the new bascule bridge, which would include bicycle and pedestrian improvements along Montlake Boulevard.

The regional bicycle/pedestrian pathway across the floating bridge has been designed to appropriate guidelines for such facilities, as defined in Chapter 1515 of the WSDOT Design Manual. WSDOT will continue to work with the City of Seattle through final design and construction to ensure that new bicycle and pedestrian facilities within the City of Seattle are designed to City standards.

C-039-009

Please see the response to comment C-039-008. The Preferred Alternative includes an approximately 1,400-foot lid from the Montlake interchange to the Lake Washington shoreline, as well as design refinements to improve pedestrian and bicycle safety in the Montlake interchange area. Chapter 2 of the Final EIS describes these features in more detail.

C-039-010

Comment acknowledged. WSDOT remains committed to measures recommended in the Health Impact Assessment that have been incorporated into the project to improve walkability, bicycling opportunities, and transit access. WSDOT also continues to implement context-sensitive design, noise reduction features, and advanced stormwater treatment to the fullest extent possible in the corridor. The improved mobility afforded by the new HOV lanes will also reduce air pollutant emissions, including air toxics, compared to No Build, providing benefits to human health.

C-039-011

Over the long term, the Preferred Alternative would improve air quality and noise in the Montlake area compared to the No Build Alternative. The Preferred Alternative includes a nearly 1,400-foot lid over the Montlake interchange and additional design refinements to improve pedestrian and bicycle safety in the Montlake interchange area. This lid, as well as the proposed 10th and Delmar lid, would also provide benefits to the area's visual quality. Please see the response to comment C-039-008 for information on how WSDOT worked with the City of Seattle and bicycle and pedestrian groups through the ESSB 6392 process and Chapter 2 of the Final EIS for a description of the Preferred Alternative. WSDOT will coordinate closely with members of the affected communities and other interested stakeholders to develop urban design concepts for the lids that maximize their benefit to the neighborhoods.

Regarding construction effects, WSDOT is developing a Community Construction Management Plan (outlined in Attachment 9 to the Final EIS) for the SR 520, I-5 to Medina project that will include appropriate best management practices, mitigation commitments, and ongoing consultation and coordination commitments to local communities. WSDOT will continue to work with the communities affected by the project as it progresses. Please see the addenda to the Construction Techniques and Activities, Noise, Social Elements, Visual Quality, and Aesthetics Discipline Reports (Attachment 7 to the Final EIS) for information on best management practices and mitigation measures to minimize effects on neighborhoods.

C-039-012

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

would result in a reduction of in traffic volume on Lake Washington Boulevard in the Arboretum compared to No Build. Under the Preferred Alternative in 2030, a.m. peak hour volumes on Lake Washington Boulevard through the Arboretum would be 1,330 vehicles per hour, compared to 1,950 vehicles per hour with the No Build Alternative. P.m. peak hour volumes would be 1,410 vehicles per hour compared to 1,730 with the No Build Alternative. WSDOT is also funding traffic calming measures in the Arboretum, as well as coordinating with the Seattle Department of Transportation on traffic management strategies for the Arboretum area. Please see Chapter 2 of the Final EIS for additional information.