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Comments on Chapter 7: Indirect and Cumulative Effects

C-042-001 | "Chapter 7: Indirect and Cumulative Effects," ranges far and wide to put effects of the SR 520 project in a regional, and statewide context and thus ignores indirect and cumulative effects on communities and resources in the local SR 520 bridge area.

Its suggested indirect and cumulative effects mitigation strategies involve other agencies and regional governments down to the community level, but not WSDOT.

Ch 7, p 7-2 "A cumulative effect is the project's direct and indirect effects on a particular resource combined with the past, present, and future effects of other human activities on that same resource. The result is the expected future condition of the resource when all of the external factors known or likely to affect it are taken into account." This does not suggest that the resource must be assessed on a region-wide basis, on p 7-5 said to be "the central Puget Sound Region, which includes portions of King, Kitsap, Pierce, and Snohomish counties."

C-042-002 | Similarly, the time frame for most resources is said on p. 7-8 to be the mid-nineteenth century to the present or, elsewhere, some time in the future as distant as 2040. Acceleration of effects in recent years is noted so that additional effects of the project can be portrayed as just part of a trend.

C-042-003 | Ch 7, p 7-2 Considering unintended indirect and cumulative consequences of the proposed action "in context with other development and transportation improvement projects planned throughout a region" does not mean that the context must be a geographically large region. All effects in the immediate region of a project would be dwarfed if they were placed in the context of a large region, and there would be no findings of adverse effects from the project. I would be very surprised to find that this deceptive refusal to address local and shorter-term, although otherwise long-term, effects was intended in the definitions of indirect and cumulative effects, and this interpretation of the definitions needs to be either adjusted or challenged.

C-042-004 | p 14 "Because of these funding limitations, there is a strong possibility that WSDOT would construct the project in phases over time . . . lids would be deferred until a subsequent phase."

C-042-001

Indirect and Cumulative Effects, by definition, look at a broader study area than the project area. They were developed to address those effects that were not addressed through direct effects analysis, which are more focused on the neighborhoods and communities near a project. The representative exhibits of the geographic extent of the cumulative effects analysis have been revised to clarify resource specific study areas in the Final Indirect and Cumulative Effects Analysis Discipline Report.

As with direct effects, WSDOT develops mitigation for the indirect effects of its projects. However, cumulative effects include contributions from many sources, which make it difficult for any one agency to mitigate them effectively. By mitigating the direct and indirect effects of its actions, WSDOT can minimize its own contribution to cumulative effects.

C-042-002

This comment regarding the time frame for most effects and acceleration of effects in recent years is an inaccurate characterization of the time frame used to assess each resource. Page 7-8 of the SDEIS stated, "For most resources, the cumulative effects time frame starts in the mid-nineteenth century, when the central Puget Sound region began to be altered by non-Native American settlers. The time frame for all resources ends in 2030, the project design year." When determining the time frame for a cumulative effects assessment, it is important to identify a starting point, usually when the status of a resource began to change due to external causes. For some resources, that point of change was within a more recent timeframe so the resource specific timeframe was adjusted as appropriate.

C-042-003

Please see the response to comment C-042-001, which states indirect and cumulative effects, by definition, look at a broader study area than

C-042-004

No other projection of timing for lid construction is offered, and effects findings throughout the report depend on lidded circumstances. The indirect and cumulative effects on these resources with lids indefinitely deferred need to be addressed.

p. 77, second para Refers to effects of a seven-and-a-half to eight-year construction projects as “short-term effects.” Surely such a long-term construction project would result in direct, indirect, and cumulative effects on the communities adjacent to the construction project. Such a long-term, “temporary” construction period would result in effects tantamount to permanent.

p 77, third para Landscaped lids at Roanoke Street, 10th Avenue East, and Montlake Boulevard are said to have a positive effect. Deferred construction of the lids, projected in the Phased Implementation Scenario said in this and other discipline reports as the most likely scenario and surely a source of direct, indirect, and cumulative effects, is not considered in the examination of effects.

Please include the indirect and cumulative local and shorter-term effects on the various kinds of resources in the project area. Do not hide such effects in large geographic areas and century-long timeframes so that claims of “no net loss” can falsely deny the very real likelihood of effects on resources in the communities adjacent to the project. This kind of sleight of hand destroys good faith relations between representatives of the affected local areas and WSDOT. Acknowledge the likelihood of adverse effects, direct, indirect, and cumulative, and address them in Memoranda of Agreement with the representatives of the affected resources.

C-042-005

What about local effects?

Indirect effects of the project are rarely acknowledged in this chapter, and most cumulative effects are measured on a region-wide, no-net-loss basis and in that huge context thus found to be either minor or beneficial. Indirect and cumulative effects on the local context are not considered except where an effect (if it were acknowledged) would be undeniably local (effects on visual quality, for instance, or on cultural resources).

Where local effects are considered, denigrating, minimizing, and distorting descriptions of present circumstances (most drawbacks a result of earlier WSDOT projects) or diminutions of the effects of the project itself serve as the bases from which to draw the conclusion that there would be no adverse effects—the infamous “there is already a bridge there, so a replacement bridge would not have an adverse effect” distorts the effects of the earlier bridge (nowhere near so adverse as that of the new bridge) and ignores the mitigating work of communities and the City in the years since the 1960s while minimizing the direct, indirect, and cumulative effects of the new, more than twice as wide, higher bridge moved north in front of more homes.

Despite the few findings of either kind of adverse effect—indirect or cumulative—each resource section contains a mitigation discussion in which WSDOT predicts that future trends in transportation alternatives, community and regional planning, and lids (which will be indefinitely deferred in the most likely Phased Implementation Scenario) will mitigate effects. WSDOT also suggests ways in which other agencies and organizations—not WSDOT—can mitigate the unacknowledged effects after WSDOT has had its way.

C-042-006

What about indirect and cumulative effects of construction?

Indirect or cumulative effects of construction are rarely considered—with respect to only the Transportation discipline and, briefly, the Air Quality discipline. Note that a construction period of 7-and-a-half to 8 years is tantamount in its effects to permanent for many flora and fauna including humans. At the very least, prolonged construction conditions will lead to indirect and cumulative local

the project area. The definition of indirect and cumulative effects were developed by CEQ to address those effects that direct effects analysis misses, which are unintended indirect effects and effects that add to the cumulative effects on a resource from past, present and reasonably foreseeable future actions.

C-042-004

The SDEIS discussed the possibility of constructing the project in separate phases over time, with the vulnerable structures (the Evergreen Point floating bridge, west approach bridge, and Portage Bay bridge) built first. This “Phased Implementation scenario” was analyzed for each environmental resource. Due to the funding shortfall, FHWA and WSDOT still believe it is prudent to evaluate the possibility of phased construction of the corridor should full project funding not be available by 2012. Currently committed funding is sufficient to construct the Evergreen Point floating bridge and landings; a Request for Proposals has been issued for this portion of the project, with proposals due in June 2011. Accordingly, this Final EIS discusses the potential for the floating bridge and landings to be built as the first phase of the SR 520, I-5 to Medina project. This differs from the SDEIS Phased Implementation scenario, which included the west approach and the Portage Bay bridge in the first construction phase. See Section 2.8 of this Final EIS for further information on potential project phasing.

However, whether or not the west approach and Portage Bay Bridge portions of the project are delayed, the full-corridor delivery strategy includes area-by-area implementation of the project, including lids. Lids would be built at the same time as the corresponding portion of the corridor. The enhanced pedestrian and bicycle crossing and two lids are major project elements that will be delivered as part of the SR 520, I-5 to Medina project.

The Final EIS presents findings related to construction effects based on

C-042-006

effects in all of these disciplines and to the perception that the local area bounded by the construction footprint, limits of construction, area of potential effects, etc., in a widening circle—300 meters out, according to the *Health Impact Assessment*—is blighted in many ways that affect health and therefore the desirability of single-family residential communities adjacent to the construction and operation of this project. This accurate perception would result in indirect effects of demographic, physical, and economic changes to the prosperous residential communities adjacent to the new bridge and the widened roadway on the west side.

p. 7-5 “WSDOT considered construction-related effects to be **short-term** and temporary in relation to the **long-term trends** affecting the resources. Second, WSDOT considered operational effects of the project to be long-term and permanent **through the project design year, 2030**. On the basis of these two assumptions, WSDOT considered only direct or indirect effects of **operating** the completed facility as potential project contributions to cumulative effects. This was because in most cases, only these permanent effects would have the potential to influence **long-term trends** in the condition of the resources.” [Emphases added.]

C-042-007

When and where did influencing long-term trends, as opposed, say, to pushing conditions to a tipping point, become the sole criterion by which cumulative effects are judged? Consider, for instance, the case in which project demolition and construction vibration produces a landslide on a property already experiencing tremors and intermittent landslides, and this time the landslide carries the house down a precipitous hill. The cumulative effect has been to bring about a catastrophic event, not a long-term trend, but the effect has been cumulative, from the “incremental impact” of the action.

“WSDOT did recognize, however, that in the case of a resource already under severe environmental stress, **short-term** construction effects added to the effects of other past, present, and reasonably foreseeable future actions **could tip the balance** and adversely affect the resource. **No such case** was found in the cumulative effects assessments conducted for this SDEIS.” [Emphases added]

Other such cases are possible. Reconsider the “No such case” finding. It taxes credulity.

C-042-008

The following notes permit a quick survey of conclusions reached in Chapter 7: Indirect and Cumulative Effects. The study area (local or regional), time span, and conclusion with respect to the indirect and cumulative effects of the project on each resource are noted.

Transportation

Indirect Effects, Operation

Study area Regional Travel Patterns Seattle and Eastside including I-5, I-405, and SR 520.

Time? Default 2030.

Outcome of operation similar to No Build, especially for north-south trips. Slight increase in east-west trips from use of HOV.

Cumulative Effects, Construction

Study area University of Washington Medical Center, Sound Transit University Link, Bellevue, Mercer Island, Redmond, Kirkland.

Construction period 7 and a half to 8 years

Outcomes truck traffic, lane closures and detours, slowdowns and cut-throughs, short-term **(7-and-a-half to 8 years!)** and **permanent (?)** access limits, temporary transit changes.

the construction required for a full project delivery, as well as effects related to revised potential phasing (see Sections 5.15 and 6.16 of the Final EIS).

Direct effects, including construction effects, and indirect effects are considered in the cumulative effects analysis. As described in the response to C-042-001, the cumulative effects study area and timeframe differ from the direct effects analysis to capture long-term trends but does not revisit the direct effects analysis.

For a more detailed discussion of permanent effects and effects during construction, please see Chapters 5 and 6 of the Final EIS.

C-042-005

The direct and indirect effects of project construction and operation are captured in the resource specific discipline reports then considered in the cumulative effects analysis. As indirect effects are either distant from the project or later in time, they typically would not be specific to a neighborhood. The cumulative effects study area is based on the extent of the resource in relation to the project so varies based on the resource and not an arbitrary boundary. Where appropriate, the cumulative effects study area is close to the project area, such as with cultural resources, or broad, such as with aquatic resources. The analysts followed the resource specific guidance to determine direct effects then followed the guidance on indirect and cumulative effects analysis to identify effects to the resource without the project (essentially the No Build Alternative) and with the preferred alternative.

FHWA and EPA guidance require WSDOT to disclose cumulative effects and to suggest practical mitigation options that could be taken by the contributing public agencies and private developers. Consequently, Chapter 7 of the Final EIS lists ways that the responsible parties could mitigate cumulative effects that are beyond WSDOT’s jurisdictional

C-042-008	<p>Cumulative Effects, Operation Study area University of Washington Medical Center, Sound Transit University Link, Bellevue, Mercer Island, Redmond, Kirkland. Time through 2030 Outcomes with completion of SR 520 Redmond to Seattle, increase in carpool and transit (14 %, 51 % w/No Build) reduced demand, reduced travel times and reduced congestion choke points. Light rail demand on I-90 to increase, tolling to reduce demand for SOV.</p>
C-042-009	<p>Land Use</p> <p>Indirect Effects Construction effects not mentioned Study area is City Of Seattle, no substantial change to overall land use pattern and no indirect effects. Cumulative Effects Study area central Puget Sound region Time Vision 2040 and WA Growth Management Act [date?] Outcome some conversion of existing land uses to transportation right-of-way, “only a small portion of the total land in the central Puget Sound region.”</p>
C-042-010	<p>Economic Activity</p> <p>Indirect Effects Construction effects not mentioned. Cumulative Effects Study area the regional economy, no direct or indirect effect, except beneficial effects of improved transportation efficiency. No contribution to lasting trends in economic activity.</p>
C-042-011	<p>Social Elements</p> <p>Indirect Effects No construction change of demographics or land use patterns as project would not induce growth. [What about reducing growth or changing demographics as single-family owners with children accurately perceive the effects on themselves and their children of a prolonged, 7-and-a-half to 8-year construction period and the eventual permanent operational effects, especially on their health? See the Health Impact Assessment.] No indirect effects on social elements including public service and utilities. Cumulative Effects, Operation Only temporary negative effects, typical disruption from construction. Benefits to community cohesion (lids?), no long-term effects on public service providers, no cumulative effects.</p>
C-042-012	<p>Environmental Justice</p> <p>Indirect Effects “Disproportionately high and adverse effect on low-income populations” because of tolling only. No adverse effect minority populations. Other effects on the two groups positive. None of the effects indirect. Cumulative Effects Tolling could increase traffic on other roadways through low-income neighborhoods [the study area?]. Cumulative effects of heavy traffic including noise, air emissions, and lowered transportation efficiency from idling or slow-moving vehicles could worsen as drivers avoid tolling on SR 520. Also increased transportation costs for low-income households and social service agencies that serve them. But safer, more reliable transit and other projects would help to promote affordable mobility by increasing efficiency of regional transportation levels.</p>

responsibilities.

As discussed in the response to Comment C-042-004, lids are considered a major project element; therefore, the lids will not be deferred and will be completed together with the portion of the project in which they are located.

C-042-006

Construction of the SR 520, I-5 to Medina: Bridge Replacement and HOV Project is expected to last between 5 to 6 years, not 7.5 to 8 years as suggested in this comment. Potential effects from construction are considered in the cumulative effects analysis as a direct effect though not separately. The paragraph cited in this comment has been revised to reflect how construction effects are considered in the cumulative effects analysis. Concurrent construction effects are discussed in Chapter 6 of the Final EIS.

WSDOT has determined that construction of the Preferred Alternative could temporarily or permanent alter or diminish the integrity of adjacent resources, including historic resources such as the Roanoke Park Historic District. To minimize construction-related effects, WSDOT will implement a cooperatively developed Programmatic Agreement (Attachment 9 to the Final EIS) and Community Construction Management Plan (outlined in Attachment 9 to the Final EIS). Both the Programmatic Agreement and Community Construction Management Plan will be developed in coordination with the Section 106 consulting parties and would resolve the adverse effect from the project.

Research indicates that the effects of a transportation project on property values cannot be calculated with certainty. Property values fluctuate constantly based on a variety of factors, including the general condition of the economy at national, state, and local levels. Proximity to a newly constructed roadway is another factor that may have an effect on the

C-042-012 | Slight benefit to water quality and fisheries, long-term trends not measurable. Area watersheds overall, only an extremely small fraction and only a small portion of that fraction used by salmon and related species, so no effects on Native Americans fishing, and “the project is not likely to add to the cumulative effect on Native American traditional cultural properties, or the presumed Foster Island TCP.”
Mitigation
Let them eat, er, take transit, improve mobility in their (not-tolled) corridors, and let them live where they work, in urban centers.

C-042-013 | **Recreation**
Indirect Effects
Construction effects not discussed.
Changes in access, surrounding land use, noise levels or visual intrusion would be indirect effects, but most indirect effects **[of construction?]** on park and recreational resources would be positive by encouraging greater use, improving connectivity and linkages, and improving noise levels and visual quality “in certain locations.”
Bike and pedestrian path and **lids** would encourage pedestrian and bike use over the long term. Noise walls would produce long-term benefits for park users. **[Noise walls will also impede views in many recreation areas.]**
Moving MOHAI would directly and indirectly benefit MOHAI over time.
Cumulative Effects
No permanent loss in total park area. **[That’s all that counts?]**
Mitigation
In the form of replacement parkland “in the vicinity,” according to City of Seattle Ordinance 118477.

C-042-014 | **Visual Quality and Aesthetics**
Indirect Effects
Construction effects not discussed. No indirect effects, only direct effects on structures, landforms, and vegetation changes.
Cumulative Effects, Operation
Long-term presence of new Evergreen Point Bridge “would not make much difference” because it would “replace a similar bridge that exists in approximately the same location today. On the other hand, the wider roadway, retaining walls, noise walls, and other features . . . would create a more urban visual character . . . would add to the cumulative effect of other present and planned development projects contributing to the increasingly urban visual quality of the study area.” **[What is the study area?]** Direct effects would be a mixture of beneficial and detrimental changes—**increase in paved surfaces and concrete structures but introduction of vegetated roadway lids for visual continuity and softening.** “On balance, the cumulative effect on visual quality and aesthetics **within the SR 520 study area and surrounding central Puget Sound region** would be an increasingly urban visual character, to which the proposed project would make a small contribution with both beneficial and detrimental visual elements.” **[No discussion of local viewsheds.]**
Mitigation
“Community planning efforts that establish context-sensitive architectural and design standards, preserve visually significant stands of vegetation, and preserve important views and community gathering places.” **[This will come too late for a good bridge design, and the bridge will be the dominant feature of the area. Let’s begin with a beautiful, sensitive bridge design.]** “Comprehensive planning by the Puget Sound Regional Council . . . contributing to the quality of life throughout the region.” “Regional and community planning in the design of individual development projects.” **[How about viewshed-based mitigation? See watershed-based mitigation in Ecosystems, wetlands discussion.]**

C-042-015 | **Cultural Resources**
Indirect Effects
None identified because all project-related effects on cultural resources would be within or close to the project construction footprint and occur at the time of **construction.** **[Odd and certainly questionable reasoning. What about**

value of property, but it is not possible to quantify this effect with any certainty. Some properties could be negatively affected by a new roadway, while others could benefit from reduced congestion. Therefore, it would be speculative to draw conclusions about changes in property value, and consequent changes in population, as a result of the project.

C-042-007
The section referenced in this comment and in the response to C-042-006 has been revised to clarify how construction-related effects are considered in the cumulative effects analysis. The intent of the language in the SDEIS was to demonstrate that there were sufficient modifications to construction and operation along with mitigation measures for this project to not create a situation where the project could have a cumulative effect and “tip the balance” on a resource. The analysis was updated for the Final EIS and the Final Indirect and Cumulative Effects Discipline Report notes that in two cases – aquatic resources and greenhouse gas emissions – WSDOT found that construction effects would persist over the long term and make minor contributions to cumulative effects.

In response to the scenario presented in the comment, landslide risk as a result of vibration associated with the project is not expected in the historic district. The risk of vibration-induced landslides in the glacially overconsolidated silt and clay is relatively low, because the magnitude of soil deformation is quite small—too small to shear the soil and cause loss of strength. Because of the relatively low permeability, construction vibrations are also unlikely to result in loss of strength in the landslide deposits. Throughout construction, WSDOT will monitor vibration at sensitive locations and will take measures to minimize potential effects.

Additionally, WSDOT has developed a Programmatic Agreement (Attachment 9 to the Final EIS), in coordination with the Section 106 consulting parties, that records the stipulations agreed upon to resolve

C-042-015

effects within the “limits of construction” (larger than the construction footprint) and within the Area of Potential Effects (even larger than the limits of construction)?

Both construction and operation would have indirect effects, in which air quality, noise, visual blight, and traffic vibration from more and larger vehicles would contribute to a perception that the neighborhood was unhealthy and less desirable. The single-family owner with children demographic would change, the now undesirable properties would be likely to become rentals and rooming houses, maintenance of resources already compromised by more air pollution contributing to building soiling and erosion would decline further as absentee owners cut corners and ignored preserving historic integrity. One need look only at the predominance of historic non-contributing resources along Harvard Avenue East, adjacent to I-5, to see the indirect and cumulative effects of a major construction period and the operation of a large highway on cultural resources in an adjacent community. Subsequent community efforts over the last twelve years to change the ambience of Harvard Avenue East via tree and other vegetative plantings plus traffic calming efforts came too late for the architectural integrity of these largely now-rental historic properties. Happily, the neo-classical revival Edward J. Duhamel William H. Parsons House (1903, the Harvard Mansion as a City Landmark) has after a great deal of expense after it had been carved up as a rooming house, has been restored to its former single-family splendor. Most of the other historic resources along the I-5 corridor have suffered much worse fates after the construction of I-5 and are not contributing resources.

Cumulative Effects

Minor contribution to the cumulative effect on cultural resources of the central Puget Sound region. Time range the past 150 years. “The project is not likely to add to the cumulative effect on built environment properties, archaeological resources, traditional cultural properties, or the presumed Foster Island TCP.” Project would not affect historic built environment to extent that it would no longer be eligible for listing in the NRHP. [No mention of changes to setting and feeling and characteristic use, local economic impacts, perceived health effects on local demographics. See above.]

Mitigation

Section 106 speaks to only direct and indirect effects, according to this section. [According to Dr. Allyson Brooks, Director/State Historic Preservation Officer, Department of Archaeology and Historic Preservation, in response to a query generated by this statement March 16, 2010, Section 106 does speak to cumulative effects as well. And “demolition by neglect” is recognized as an adverse effect.]

C-042-016

Noise

Indirect Effects

None. All noise effects would be direct because detected by people close to the project. [What about perceived health effects from noise and the indirect economic effects of a noisy residential district? Demographic effects?]

Cumulative Effects

Time 2030. Project to produce equal to or slightly less than current noise levels and future noise levels without the project. No new projects close to SR 520. But project would contribute to noise effects of other projects continuing to operate. Project compared with No Build would substantially decrease number of residences exceeding NAC noise levels.

Mitigation

Lids, noise walls, electric motor vehicles, quieter vehicles, transit, HOV, bike and walking, and by Vision 2040, increasing urban density within central Puget Sound region with transit-oriented multi-modal transportation system. [It's long past time to consult with the Arizona Department of Transportation and learn how to install quieter pavement properly. These long-term evaluations, clear out to Vision 2040, mask the very real noise effects of both construction and operation. WSDOT should agree to mitigate effects of noise from the highway in multiple ways and to mitigate noise on the arterials from both construction and the increases in local traffic from approaches to and exits from the new six- or seven-lane Portage Bay Bridge.

the adverse effect from the project.

For an updated indirect and cumulative effects assessment, please see the Final Indirect and Cumulative Effects Analysis Discipline Report (Attachment 7 to the Final EIS).

C-042-008

The central Puget Sound region is the geographic study area for the assessment of indirect and cumulative effects on transportation. Please see Exhibit 7-2 of the SDEIS for a graphic depiction of the study area. This study area is consistent throughout the discussions of indirect operation effects, concurrent construction effects, and cumulative operation effects on transportation.

The time frame used to assess indirect and cumulative effects on transportation from project operation stretches from present day to 2030. The time frame used to assess cumulative effects on transportation from project construction is the estimated construction period of 5 to 6 years, rather than 7.5 to 8 years as suggested in this comment.

Permanent modifications to access would occur where the developed design proposes lane and intersection realignments. Access to homes and businesses will be maintained during construction. The effects on transportation during construction described in the SDEIS are refined and reported in more detail for the Preferred Alternative in the Final Transportation Discipline Report (Attachment 7 to the Final EIS).

WSDOT's traffic models and analyses demonstrate that after construction, the cumulative effect on transportation from project operation would be an overall benefit to regional transportation.

C-042-009

The central Puget Sound Region is the geographic study area for the

C-042-017

Air Quality

Indirect Effects

Construction trucks hauling, excavation at borrow sites distant. Tolling potentially will create higher volumes on alternative routes, creating an indirect effect on air quality there from exhaust emissions and increased idling from congestion. **[No mention of local effects from construction activity over 7-and-a-half to 8 years and of the indirect effects of the correct perceived increase in air pollution and consequent changes in owner-occupied, single-family communities, especially the migration out of the communities of families with children.]**

Cumulative Effects

Project "not expected to create any new violations." **[No mention of correctly perceived cumulative effects on air quality of the addition of two lanes for buses and HOVs, both gas-powered.]**

Mitigation

Advances in auto technology, fuel content regulations, increased availability of alternative fuels. Reduction in vehicle miles traveled, overall improvements in transportation system efficiency. Employee parking management, incentives for commuting. **[All of these mitigation projections, into the future, are good reason to reconsider the mammoth project in the first place. The projections into the future of these ameliorating circumstances suggest that they will come far too late to protect the adjacent areas from the consequences of more gas-powered traffic on SR 520 and adjacent arterials.]**

C-042-018

Energy Consumption and Greenhouse Gas Emissions

Indirect Effects

Study area **the whole state**. Indirect effects only "if **construction or operation** of the project were to cause measurable effects on other sectors of the economy, such as utilities, or affect the ability of Washington State to meet the energy demands for this project, requiring the expansion of existing resources." But wouldn't happen because we rely heavily on hydropower for electricity. **[Does this seem like an over-simplification? Don't we sell some of our power to other states, too?]** Project's **operational** contribution to energy consumption too small (1 percent of state's total annual energy consumption) to have a consequential indirect effect.

No undue demands from **construction and operation** of the project on petroleum sources, and no effect on other sectors of the economy.

"In general," **operation** of the project would improve energy consumption and GHG emissions with addition of HOV lanes and regional bike path. **[Only in the very long term and too late to salvage communities after the damage done.]** With or without the project, cumulative vehicle emissions from vehicles using SR 520 would increase, but slightly less with the 6-Lane Alternative than with the No Build alternative. **[Again, only in the very long term. Immediate effects of a protracted construction period and the increase in gas-powered traffic from two more lanes would have a great effect on GHG emissions and energy consumption in the immediate region.]**

Cumulative Effects

Construction and operation would make a very small contribution to statewide GHG emissions.

Long-term operation would reduce Vehicle Miles Traveled below present and future conditions more than No Build. **Long-term operation in the whole corridor**, I-5 to SR 202 plus East Link and North Link light rail and other foreseeable projects would consume energy and emit GHGs, but projects together would generate a smaller contribution to the cumulative effect on energy consumption and GHG emissions than their No Build alternatives because projects would reduce VMT and improve **regional** transportation efficiency. **[Under the current plan, only a long time after operation has begun.]**

Mitigation

Addressing global climate change at **regional, national, and international** levels. **State** policies to address GHG between now and **2050**. Car pooling, vanpooling, transit, HOV, bike, and pedestrian. Land use planning—concentrating growth in urban growth areas. Variable speeds and **tolling**. Better autos, fuel content regulation, lower-carbon fuels, public transit, bike trail networks, to reduce SOV trips. **[How wonderful! Then why are we devoting \$4.65 billion and two new lanes to more gas-powered traffic on the highway and on local arterials?]**

assessment of indirect and cumulative effects on land use. Please see the Final Indirect and Cumulative Effects Analysis Discipline Report (Attachment 7 to the Final EIS) for an updated map of the study area. This study area is consistent in the indirect and cumulative effects discussions.

The Growth Management Act, which was passed by the Washington Legislature in 1990 and subsequently amended a number of times, ultimately guides land use patterns in the Puget Sound region and throughout the state. Regional and local jurisdictions develop comprehensive plans that direct land use patterns. WSDOT must work in coordination with these plans, and even aid their implementation. This project will result in no substantial change to overall urbanized land use patterns in Seattle.

C-042-010

The central Puget Sound region is the geographic study area for the assessment of indirect and cumulative effects on economic activity. Please see the Final Indirect and Cumulative Effects Analysis Discipline Report (Attachment 7 to the Final EIS) for an updated map of the study area.

C-042-011

Page 62 of the Indirect and Cumulative Effects Discipline Report (Attachment 7 to the SDEIS) discusses the potential for an indirect effect on community cohesion as a result of project construction. In response to the scenario presented in this comment regarding changing demographics due to personal perceptions of the effects of a 5- to 6-year construction period, the National Environmental Policy Act process avoids speculative conclusions regarding the future actions of specific individuals or groups when supporting evidence is lacking. Additionally, WSDOT is developing a Community Construction Management Plan (outlined in Attachment 9 to the Final EIS) to avoid, minimize, and

C-042-019

Water Resources

Indirect Effects

Stormwater treatment facilities mean **long-term trend of gradual improvement** in surface water quality. Project along with rest of corridor projects and Eastside transit and East and North light rail to contribute to positive trend of improved surface water quality.

Construction runoff to be mitigated in accordance with NPDES requirements and WSDOT BMPs.

Long-term operation improvement relative to present and No Build in study area **[which is?]** between now and 2030.

Mitigation

Add stormwater treatment facilities as projects are built and operated. Retrofit local streets and parking lots. **[Address these suggestions in a Memorandum of Agreement.]**

C-042-020

Ecosystems

Wetlands, Fish and Aquatic Habitat, Wildlife.

Direct effects would be mitigated as part of project. **[Which see in Ch 5 Ecosystems section and Attachment 7: Ecosystems Discipline Report.]**

Indirect Effects

None in **wetlands**, just **direct** effects **[which see]**.

On **aquatic resources**, effects limited to lake and estuarine environments in study area not farther removed in distance **[local]**, consistent with present. WSDOT says no effect later in time than project activity **[7 ½ to 8 years of construction!]**. So no measurable effect. **[Seems doubtful with a protracted construction period.]**

On **wildlife and wildlife habitat** (see Chapter 4 and Ecosystems Discipline Report) **permanent** removal or shading of vegetation, but improving stormwater treatment and decreasing noise disturbance **[all from noise walls?]** **Direct** effect would arise from animals moving to other areas because of habitat loss and displacing or competing with animals in their new habitats. **[Would this not result in indirect and cumulative effects as well?]**

Cumulative Effects

Wetlands Cumulative effect would be neutral because all projects would follow federal, state, and local wetland regulations, including mitigation. **Aquatic resources**, minor effects because **the study area is so large**, individual fish range as far as the Pacific Ocean up to 2,000 miles from study area. **[What about local direct, indirect, and cumulative effects on fish population in Lake Washington, where much money has been spent to increase salmon activity?]** Increase in overwater structures related to west approach and Montlake area could change juvenile salmon movements and provide more habitat for predator species.

Could affect later generations but **expected to be minor**. **[Why? Explain—don't just assert.]** Larger replacement bridge but could be offset by greater height near the west highrise, a primary migration corridor for juvenile salmonids passing through the study area **[which is?]**. **Temporary construction effects [7 and a half to 8 years!]**. Stormwater treatment, reduction of in-water columns, aforementioned increased height. So negligible effect on **long-term** fishery trends and stressors. Will affect only a portion of all the fish occurring in the area watersheds. Habitat in the study area is only a small fraction of the total fish habitat used by these fish during their life cycles. Summary: Project would not measurably affect the overall cumulative effect on these resources. **[Cumulative effects may be local as well as on the absurdly widespread areas considered here in order to claim no adverse effects.]**

Wildlife and Wildlife Habitat Suitable habitat continuing to decline. Crows, sparrows, and raccoons flourishing. **[Don't forget the Gray Squirrel, which has replaced the native squirrel. Also beaver in restored wetlands in southwest Portage Bay, Great Blue Heron, Double-crowned Cormorant, Bald Eagle, and Hawk habitat, as well as Flicker, Black-capped Chickadee, and Wood Duck.]** "A permanent loss of habitat used by urban-adapted wildlife." But "the project's long-term contribution to urban-adapted wildlife populations and habitats in the study area **[which is?]** would be negligible." **[What about local indirect and cumulative effects?]**

Mitigation

Wetlands Use federal regulatory goal of No Net Loss and state and local regulation to decrease and slow the cumulative decline of wetlands. More stringent regulation, regulation consistency **[yes!]**, and coordinating among jurisdictions **[should include WSDOT]**. Improved planning both regional and local, increased participation of "non-governmental

mitigate construction impacts.

After construction, project operation will result in several long-term benefits to community cohesion. The Preferred Alternative and all design options evaluated in the SDEIS include landscaped lids with pedestrian and bicycle pathways in the vicinity of the I-5 and Montlake Boulevard interchanges. The lids will reconnect neighborhoods originally bisected by SR 520 and improve views toward the highway.

C-042-012

Indirect effects on low-income and minority populations, including Native Americans, are discussed on pages 64 through 67 of the Indirect and Cumulative Effects Analysis Discipline Report. This comment is not an accurate representation of all determinations presented in this section of the Discipline Report.

The cumulative effects from the project on low-income and minority populations are represented inaccurately in this comment. Page 66 of the Indirect and Cumulative Effects Analysis Discipline Report states that, "there would only be a modest increase in traffic volumes on non-tolled routes as a result of the project (about 3 percent greater than the No Build Alternative on SR 522 and about 1.5 percent greater than the No Build Alternative on the I-90 Bridge.)" This increase would not constitute heavy traffic and would not contribute significantly to environmental conditions caused by existing commutes.

Affordable mobility options for low-income populations would be increased by the SR 520 project, in conjunction with the SR 520 Variable Tolling project and other planned transit and light-rail projects, because these projects would increase the efficiency of the transportation system and provide HOV lanes along the corridor.

For mitigation measures for indirect and cumulative effects on low-income and minority populations caused by construction and operation

C-042-020

organizations and other stakeholders” in restoration efforts. Watershed-based mitigation and mitigation banking—“compensatory wetland mitigation.” City of Seattle comprehensive plans and critical areas ordinances. **Aquatic Resources** Region-wide cooperative interagency approach or public-private partnerships “with a focus on improving habitat conditions and water quality within the Lake Washington watershed and Puget Sound would aid in the recovery of fish stocks.” More stringent land use regulations could reduce future negative effects on fish associated with stormwater runoff an human development.” [What can WSDOT do before, during and after its project?] **Wildlife and Wildlife Habitat** “Because there are many potential contributors to cumulative effects outside of WSDOT’s jurisdiction, the agency will not attempt to mitigate adverse cumulative effects” “However, a variety of measures could mitigate the overall (non-project-related) cumulative effects on wildlife, such as the following: [What about the project-related cumulative effects?]

C-042-021

This whitewashing of indirect and cumulative effects of a protracted construction period and the operation of a considerably widened highway with no immediate plans to replace the operation of two more lanes of gas-powered vehicles and with a likelihood of lid deferral, on all of these resources in the areas adjacent to the project, is reprehensible. A pattern of deceptive conclusions in all of the chapters and discipline reports in the January 22, 2010 Supplemental Draft Environmental Impact Statement is all too apparent and especially so in this chapter and the discipline report paired with it.

And even though it has no jurisdiction over other agencies, why does WSDOT get a free ride and mitigation fall on other jurisdictions and agencies as WSDOT recommends in this report? Is it trying to save money on mitigation that would cost a trivial amount when measured against the total \$4.65 billion for the project?

The arrogance of this assumption and of many other of WSDOT’s assumptions and unsupported or arbitrarily limited or expanded criteria makes a reader of the U. S. Department of Transportation manual for project guidance, especially of its section on “Community Involvement to the Final Product: Marketing Mega Projects [those involving more than \$1 billion] and Public Trust” blanch.

This bullying, evasive, and deceitful agency has earned an F. It obviously has not profited from lessons learned in preceding projects. The agency has needlessly aroused public opposition where it had initial trust and good faith negotiation underway. By its deceptions and maneuverings in order as far as we can tell merely to avoid acknowledging adverse effects any layman can perceive in order to avoid having to enter into memoranda of understanding for mitigation—just to save a little money, a miniscule amount when measured against \$4.65 billion—WSDOT has created a resistance it never needed to. Instead of working with the communities to create a handsome design, a better setting, and community improvements to get the public to embrace and advance its project, WSDOT has raised hackles and the likelihood of lawsuits and other delays. Public trust and cooperation (see “Construction – Public Trust and Truthfulness”) have been the most significant casualties of the agency’s tactics. It didn’t have to happen.

It’s not the 1960s anymore, and we had hoped that WSDOT realized this, too.

Sincerely,

Erin O’Connor
Historic Resources Chair, Portage Bay/Roanoke Park Community Council
Roanoke Neighborhood Elms Fund
Friends of Roanoke Park

of the SR 520 corridor, please refer to pages 70 to 71 of the Indirect and Cumulative Effects Analysis Discipline Report, as well as the Mitigation section of the Environmental Justice Discipline Report.

C-042-013

WSDOT determined that the Preferred Alternative would have no adverse indirect effects on recreational resources. During construction, the effects would be direct (not indirect as suggested in this comment) and would relate to changes in ease of access, noise, and other local, direct impacts typically associated with large construction projects.

With operation of the Preferred Alternative, overall corridor noise would be reduced compared to No Build existing conditions. Noise walls are not recommended under the Preferred Alternative for the Seattle segment 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 evaluated, because they do not satisfy FHWA feasibility criteria (see Section 5.7 of the Final EIS).

As discussed in Chapter 7 of the Final EIS, the direct effect of converting some parkland adjacent to the SR 520 corridor to transportation right-of-way—considered in the context of other past, present, and reasonably foreseeable actions—would contribute a small physical change to the long-term cumulative effect of development on Seattle’s recreational lands. However, unlike the experience of past years, today’s transportation improvement projects include mitigation in the form of replacement parkland. No permanent loss in total park area would result from the proposed project in combination with the SR 520, Medina to SR 202 project, Sound Transit’s North Link and East Link light rail projects, and other planned transportation improvement and land development or redevelopment projects. In all cases, adverse effects on recreational lands would be mitigated as consistent with applicable requirements. With or without the project, the City of Seattle would continue to manage

and acquire parklands as described in Chapter 7 of the Final EIS, and cumulatively, there is likely to be a net gain over time in the total area of parkland in the study area. For detailed documentation of the parkland mitigation process, please see the Sections 5.4 and 6.4 of the Final EIS, the Final Section 4(f) Evaluation (Chapter 9 of the Final EIS) and the Section 6(f) Environmental Evaluation (Attachment 15 of the Final EIS).

C-042-014

The travel-shed is the geographic study area for the assessments of indirect and cumulative effects on visual quality and aesthetics. Please see the Final Indirect and Cumulative Effects Analysis Discipline Report (Attachment 7 to the Final EIS) for a map of the study area.

Indirect construction effects on visual quality were not discussed under Visual Quality and Aesthetics in the SDEIS, because WSDOT did not identify any effects of this type. Indirect effects of project construction on visual quality could occur if, for example, a new material site were developed to supply aggregate for the project. No such new developments are planned, and no other indirect effects of project construction on visual quality have been identified. The Preferred Alternative would incorporate noteworthy aesthetic improvements, including a lower profile, landscaped lids, and removal of the R. H. Thomson Expressway and Lake Washington Boulevard ramps, which will offset, to some extent, the long-term trend of an increasingly urban visual character in the project vicinity. Aesthetic and context-sensitive improvements to the Preferred Alternative design would minimize the effect of the new structure in local viewsheds. Please see the Mitigation section of the Visual Quality and Aesthetics Discipline Report Addendum (Attachment 7 to the Final EIS) for more detailed information on mitigation for visual change from the Preferred Alternative.

Since the SDEIS was published, the Section 106 consulting process facilitated involvement of the Section 106 consulting parties in the design

process. This involvement facilitated context-sensitive design and will minimize the effects from operation of the project effectively.

C-042-015

Potential construction-related effects on historic properties located within the Area of Potential Effect (described on page 82 of the Indirect and Cumulative Effects Analysis Discipline Report) include “increased noise, fugitive dust, vibration, and visual quality effects.” These effects are not expected during project operation, because construction effects would be temporary and operation of the project would improve air quality and noise in the project vicinity, and would be designed to minimize long-term effects on visual quality (see the response to Comment C-042-014 regarding visual quality). As discussed in the response to comment C-042-006, the NEPA process avoids speculative conclusions and therefore does not draw conclusions about changes in property value or consequent changes in population as a result of the project.

Property owners from the historic districts participated in development of the Section 106 Programmatic Agreement and community construction mitigation plan, which provides the stipulations for mitigating effects from construction.

The Final Cultural Resources Assessment and Discipline Report provides an updated analysis of the effects of the Preferred Alternative on historic resources. The findings include changes to setting and feeling as well as potential economic impacts to some historic resources in the Area of Potential Effect. Please see the Final Cultural Resources Assessment and Discipline Report (Attachment 7 to the Final EIS) for more information.

By avoiding, minimizing, and mitigating the direct and indirect effects on cultural resources in the Area of Potential Effect through implementation

of the Programmatic Agreement and construction mitigation plan, WSDOT will minimize cumulative effects on historic properties.

C-042-016

WSDOT did not find any indirect effects from construction noise, because WSDOT will comply with all regulations and ordinances governing noise. In addition, WSDOT will employ best management practices and will monitor noise levels during construction to comply with applicable noise regulations. No indirect effects from operation noise were found, because project-related noise would be detected by people only while they were in or close to the SR 520 corridor at the same time the noise was being generated.

The Preferred Alternative includes a number of innovative noise reduction strategies, including 4-foot traffic barriers with noise-absorptive coating, encapsulating expansion joints, noise-absorptive materials around lid portals, a modified profile, and a reduced speed limit on the Portage Bay Bridge (see Chapter 2 and Section 5.7 of the Final EIS). A number of these strategies will be employed on the 6-lane Portage Bay Bridge, as well as on the approaches.

C-042-017

Air emissions from construction activities are not expected to cause a substantive change from existing conditions, and are not expected to cause a violation of National Ambient Air Quality Standards. Voluntary relocation decisions that could be made by local residents in response to air quality effects during construction of a nearby roadway project cannot be predicted reliably and, therefore, were not reported in the NEPA documents.

An important element of the project purpose is to facilitate use of the SR 520 corridor by high-occupancy vehicles and to enhance transit services and amenities along the corridor. As discussed in Chapter 7 of the Final

EIS, these measures would make a positive contribution to the cumulative effect on air quality. Project operation would comply with federal and state air quality regulatory requirements and the Puget Sound Regional Council, the entity responsible for regional planning in the project vicinity, has included the SR 520, I-5 to Medina project in its long-term planning and impact assessment documents.

Because the bridges along the SR 520 corridor are increasingly vulnerable to catastrophic failure and currently carry nearly twice as many vehicles as their designs intended, WSDOT and FHWA are preparing the environmental documentation needed to proceed with building replacement structures. Mitigation measures will be implemented throughout the SR 520 corridor to avoid and reduce potential effects on adjacent resources from project construction and operation.

C-042-018

The State of Washington's use of hydroelectric power would more than meet the energy demands of building, operating, and maintaining the SR 520, I-5 to Medina project, even with ongoing power sales. It is indeed likely that the project's positive contribution of increasing the use of HOV lanes and public transit would be a small, incremental step in offsetting cumulative energy consumption and greenhouse gas emissions, and that the benefits would accrue over the long term. Increasing the use of HOV lanes and transit is just one of many ways through which accelerating energy consumption and greenhouse gas emissions can be slowed gradually over time.

A more immediate decrease in energy consumption and greenhouse gas emissions would result from tolling and the addition of HOV lanes. Tolling is anticipated to encourage a greater proportion of drivers to use transit and carpooling, and HOV lanes would improve traffic flow and reduce idling and stop-and-go conditions. These effects would benefit

the region directly in a relatively short period of time; therefore, the comment states inaccurately that benefits would only be recognized in the long term.

The new SR 520 corridor includes a number of measures used to reduce energy consumption and greenhouse gas levels between now and 2050, such as incorporating HOV lanes to increase alternatives to driving alone (carpooling, vanpooling, and transit) and providing transit, bike, and pedestrian options for crossing in the corridor. The Preferred Alternative in the Final EIS also includes refinements to address future compatibility with future light-rail transit.

C-042-019

Lake Washington and Grays Harbor, as well as the shipping canal connecting the two water bodies, constitute the geographic study area for the assessments of indirect and cumulative effects on water resources. See the Final Indirect and Cumulative Effects Analysis Discipline Report (Attachment 7 to the Final EIS).

Each of the projects referred to in this comment will be built in accordance with the stormwater regulations at the time of their construction. Because these are areas where stormwater is currently untreated, the construction and operation of stormwater treatment facilities would contribute to the long-term trend of gradual improvement identified in this comment.

Mitigation for water resources is not included in the Section 106 Programmatic Agreement, because water quality is not protected by 36 CFR 800, Protection of Historic Properties. WSDOT will retrofit additional state-owned projects as part of the requirements their recently renewed National Pollutant Discharge Elimination System permit. However, local streets and public and private parking lots are under the control of other jurisdictions and private parties who will be responsible for retrofitting

these impervious surfaces in the future. Mitigation measures used to minimize negative effects on local water resources and ensure that water quality meets federal, state, and municipal standards are listed in the Mitigation section of the Water Resources Discipline Report Addendum (Attachment 7 to the Final EIS).

C-042-020

Indirect and cumulative effects were discussed in Chapter 7 in the SDEIS. The description of cumulative effects has been updated and is discussed in Chapter 7 of the Final EIS. Chapter 5 contains updated descriptions of indirect effects.

Although the SR 520, I-5 to Medina project will be constructed over a 5- to 6-year period, in-water construction and other work activities that could affect aquatic conditions would not occur continuously in the entire project vicinity throughout the entire construction phase. Construction activities are expected to occur in localized areas and will be confined to project- or activity-specific in-water work windows, which have been developed to minimize potential effects on aquatic species and have been approved by the relevant resource agencies.

The long-term effects of the project are expected to be very similar to existing conditions, because the new bridge would be in the same general area and affect similar habitat. Recent studies are detailed in the Final Indirect and Cumulative Effects Analysis Discipline Report (Attachment 7 to the Final EIS), which support the conclusion that long-term effects of the project would be similar to existing conditions for aquatic resources. Therefore, indirect effects on the fish populations occurring in or passing through the project vicinity are expected to be similar to the indirect effects of the existing bridge. There is no discussion of noise walls in the indirect effects on aquatic resources section in Chapter 7 of the SDEIS. There was an error on Page 7-37 of the SDEIS; the text "Direct effects would vary by species..." should have

read “Specific effects would vary by species...” This has been updated in the Final Indirect and Cumulative Effects Analysis Discipline Report. In the Final EIS, indirect effects are addressed in Chapter 5.

Fish tagging studies indicate that some delay occurs with a small percentage of fish as they pass through the ecosystems study area. However, given the overall time and distance that juvenile fish migrate along the shoreline of Lake Washington and the Ship Canal, the potential effect of the apparent delay of minutes to hours that could be associated with the new bridge on the overall survival of these fish is expected to be small. The potential effects would be even smaller when compared to the years and thousands of miles that these fish migrate throughout their lifetime.

Local effects are addressed in the discussions of both direct and indirect effects. Please refer to the Ecosystems Discipline Report in Attachment 7 of the SDEIS and the Ecosystems Discipline Report Addendum in Attachment 7 to the Final EIS for more details.

The text states “...such as crows, sparrows, and raccoons...” which does not exclude other wildlife. Please refer to Table 4-2 in the Ecosystems Discipline Report for a longer list of species found in different habitat types in the ecosystems study area. The project’s long-term contribution to urban-adapted wildlife populations and habitats in the ecosystems study area would be negligible, as stated in the SDEIS.

WSDOT will comply with all applicable federal, state, and local regulations. WSDOT has coordinated with all jurisdictions for regulatory consistency and has worked with these agencies and the Muckleshoot Tribe in the development of mitigation through the Natural Resources Technical Working Group. WSDOT has also engaged community groups through the public engagement process. WSDOT takes a watershed approach to developing mitigation and works under the no net loss directive of federal and state laws governing the natural environment,

and fish and wildlife.

By definition (40 CFR 1508.7, Cumulative Impact), any cumulative effect to which a project contributes is a project-related cumulative effect. As discussed in the response to comment C-042-001, the fact that cumulative effects include contributions from many sources makes it difficult for any one agency to mitigate them effectively. By mitigating the direct and indirect effects of its actions, however, WSDOT can minimize its own contribution to cumulative effects.

C-042-021

The SDEIS was in full compliance with NEPA guidelines, including those related to disclosure. Since the SDEIS was published, WSDOT has responded to all public and agency comments. WSDOT will continue to coordinate with the community to address ongoing concerns.

WSDOT has committed to avoidance and minimization of negative effects through the refined design of the Preferred Alternative described in Chapter 1 of the Final EIS. The modifications included in the Preferred Alternative are intended to minimize the effects presented in the SDEIS. WSDOT has committed to mitigating the remaining environmental effects from construction and operation of the project in accordance with all governing laws and regulations.

WSDOT and FHWA do not mitigate for cumulative effects, because the agencies do not have jurisdiction over the many non-WSDOT projects that contribute to them. However, WSDOT is required to disclose cumulative effects and to suggest practical mitigation options that could be taken by the responsible parties, as included in the Indirect and Cumulative Effects Analysis Discipline Report and Final Indirect and Cumulative Effects Analysis Discipline Report.

As mentioned in the response to comment C-042-018, the Preferred Alternative includes refinements to address forward compatibility with

future light-rail transit. Long-term operation of the SR 520, I-5 to Medina project and new SR 520 corridor overall would reduce vehicle miles traveled below present conditions and below future conditions projected for the No Build Alternative, facilitated by the corridor's enhancement of sustainable transportation options including public transit and HOV lanes for multiple-occupancy vehicles.

As discussed in Section 2.8 of the Final EIS and in the response to comment C-042-004, the Phased Implementation scenario discussed in the SDEIS has been revised. However, whether or not the west approach and Portage Bay Bridge portions of the project are delayed, the full-corridor delivery strategy includes area-by-area implementation of the project, including lids. Lids would be built at the same time as the corresponding portion of the corridor.

Through the Section 106 process, various public outreach projects, technical working groups, and agency coordination, WSDOT has kept the public informed and engaged as part of the environmental review and preliminary engineering process for the SR 520, I-5 to Medina project. This participation has helped to develop the conceptual bridge design and mitigation measures, as well as many of the analyses in the Final EIS. WSDOT will continue to coordinate with the various stakeholders through the design development and permitting processes and until the culmination of project construction.