



## **Board of Park Commissioners**

*Neal Adams, Vice Chair*  
*John Barber*  
*Terry Holme*  
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*Diana Kincaid*  
*Donna Kostka*  
*Jackie Ramels, Chair*

April 14, 2010

Jenifer Young, Environmental Manager  
 SR 520 Project Office  
 600 Stewart Street, Suite 520  
 Seattle, WA 98101

RE: The Arboretum and Botanical Garden Committee's Comments to the  
 SR520, I-5 to Medina: Bridge Replacement and HOV Project Supplemental  
 Draft Environmental Impact Statement (SDEIS)

Dear Ms. Young,

At its April 8, 2010, meeting the Seattle Board of Park Commissioners unanimously adopted the attached resolution as its official response to the SR520, I-5 to Medina: Bridge Replacement and HOV Project SDEIS. Please add these comments to the official record.

Sincerely,

Jackie Ramels, Chair  
 Seattle Board of Park Commissioners

Attachment: The Seattle Board of Park Commissioner's Comments to  
 the SR520, I-5 to Medina: Bridge Replacement and HOV Project  
 SDEIS

cc: Mike McGinn, Mayor, City of Seattle  
 The Honorable Richard Conlin, Chair, Seattle City Council  
 The Honorable Sally Bagshaw, Seattle City Council  
 The Honorable Mike O'Brien, Seattle City Council  
 The Honorable Nick Licata, Seattle City Council  
 The Honorable Jean Godden, Seattle City Council  
 The Honorable Tom Rasmussen, Seattle City Council  
 The Honorable Sally Clark, Seattle City Council  
 The Honorable Bruce Harrell, Seattle City Council  
 The Honorable Tim Burgess, Seattle City Council  
 Mark Emmert, President, University of Washington  
 Tim Gallagher, Superintendent, Seattle Parks  
 Peter Hahn, Director, Seattle Department of Transportation  
 Stephanie Brown, Seattle Department of Transportation

## RESOLUTION

A RESOLUTION expressing the position of the Seattle Board of Park Commissioners regarding the SR 520, I-5 to Medina: Bridge Replacement and HOV Project.

WHEREAS, the Seattle Board of Park Commissioners has been in continuous existence since 1887 and acts in an advisory capacity to the Mayor, City Council, Seattle Parks and Recreation and other City departments; and

WHEREAS, State Route 520 has been, since its completion in 1963, and continues to be to this day, a blight on the Washington Park Arboretum; creating noise and visual intrusions into the park; encouraging cut-through traffic along Lake Washington Boulevard in much higher volumes than was originally intended for the boulevard, disturbing the serenity of the Japanese Garden, and affecting the passage of people and wildlife between Marsh and Foster Islands and the remainder of the Arboretum; and

WHEREAS, the Washington Park Arboretum is Washington State's official State Arboretum and contains internationally recognized woody plant collections and North America's largest collection of *Sorbus* and Maple, the second largest collection of species Hollies and significant collections of oaks, conifers and camellias; and

WHEREAS, a new Master Plan for the Arboretum was adopted in 2001 that was the culmination of five years of planning work undertaken by Seattle Parks and Recreation, the University of Washington, the Arboretum Foundation, community groups and members of the general public; and that will guide improvements to the Arboretum for the next 20 years, including many specific projects to enhance the physical and natural characteristics of the Arboretum such as increasing habitat diversity by restoring the natural function of Arboretum Creek and the northern shoreline; and

WHEREAS, the Washington Park Arboretum contains the largest freshwater wetland complex of its type in the Seattle region, and the Master Plan, in conjunction with the existing wetlands, includes the restoration, enhancement, and creation of new wetlands by restoring the ecological and wildlife function of the former garbage dump surrounding existing SR Route 520 ramps, and creating a Pacific Northwest Marshland collection along the shoreline of Union Bay; and

WHEREAS, implementation of the SR 520, I-5 to Medina: Bridge Replacement and HOV Project, as currently proposed, will forever compromise the aesthetic setting, biological diversity, educational opportunities, and physical connections for people and wildlife within the Washington Park Arboretum:

**NOW, THEREFORE, BE IT RESOLVED BY THE SEATTLE BOARD OF PARK COMMISSIONERS THAT:**

The Board cannot endorse any of the alternatives identified in the Supplemental Draft Environmental Impact Statement for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project, issued on January 22, 2010, due to the profound negative environmental impacts the project would have on the Washington Park Arboretum and the other City of Seattle Parks along the SR 520 corridor. The Board makes the below recommendations

The preferred alternative chosen must be consistent with the following principles:

- The structure should minimize the impacts on the Washington Park Arboretum, especially the Japanese Garden and Foster and Marsh Islands, and other adjacent and nearby parks such as East Montlake and McCurdy Parks;
- The structure should have the least number of travel lanes possible;
- The structure width should be the minimum necessary for safe passage;
- Any structure should be designed to have the least amount of coverage and shadow impacts on park land below;
- Any structure should be designed to have the least amount of impact to wetlands, aquatic resources and fish, in particular Federally protected salmonids that travel through Portage and Union Bays to and from their spawning grounds and the Pacific Ocean;
- All construction activities must be sited and timed to have the least impact on park users and the natural environment;
- Clear, open, and safe access for people and wildlife under the structure must be provided to reconnect severed components of the Arboretum; and,
- Any required wetland mitigation must occur within the Arboretum first; if the area within the Arboretum is insufficient to accommodate the required mitigation, Park sites within Seattle on or adjacent to Lake Washington must be considered.

Mitigation of the continuing highway and future project impacts must be considered, regardless of the alternative/option chosen, to re-establish the Arboretum experience. As a starting point, the following should be considered in any mitigation package:

- Address the traffic impacts to the Arboretum caused by increased traffic along Lake Washington Boulevard (LWB) including prohibiting access to and from SR 520 to LWB; repaving LWB with "quiet" pavement; incorporating other traffic calming measures in LWB to discourage through traffic movements;

- Completely fund the Arboretum Master Plan, including wetland and shoreline restoration and planting (approximately \$60 million);
- Develop the stormwater pond in East Montlake Park for educational use;
- Provide a park-like lid at Montlake (depending on the option, the lid should extend as far as possible given the geography) which will create a strong connection between the neighborhood and the Arboretum;
- Replace (at WSDOT's expense) all of the functions served by the Museum of History and Industry (MOHAI) building; and,
- Design and provide access and parking at East Montlake Park for access to the Arboretum Waterfront Trail and for hand-launched boats.

L-001-001 | The Board also respectfully submits the following comments in response to the Supplemental Draft Environmental Impact Statement (SDEIS) for the I-5 to Medina: Bridge Replacement and HOV Project issued on January 22, 2010:

- **Bagley Viewpoint** - Bagley Viewpoint is a well visited viewpoint along Delmar Drive East which provides views to the east of Lake Washington, Montlake Cut, the University of Washington and the Cascade mountain range. No other viewpoint in Seattle provides this unique view to the east. The viewpoint was redeveloped following the construction of the access freeway to the Evergreen Point floating bridge in 1963. The freeway cut the viewpoint off from its previous connection to Interlaken Park.
  - Loss of this unique viewpoint must be mitigated. The SDEIS indicates that a lid is proposed in this area that will provide similar view functions and also serve to reconnect the neighborhood through the triangle between 10<sup>th</sup> Avenue East, East Roanoke Street and East Delmar Drive. WSDOT must ensure that this lid remains part of the project and does not get removed due to funding concerns. Absent the lid, WSDOT must provide a view opportunity similar to the one now provided by Bagley Viewpoint and work to reconnect this viewpoint to Interlaken Park as it was originally constructed.
- **Montlake Playfield** - While the physical impacts to the playfield associated with the SR 520 project will be minimal, the visual impacts and noise associated with the project, both during construction and after it is completed will be significant. Every effort must be made to limit the potential for noise from the freeway to impact users of the playfields, members of the public who come to the area to take advantage of the newly reconstructed hand-carried boat launch, and the public and fauna that use the newly enhanced wetland areas.
  - During construction, any temporary work bridges and/or barges must not restrict canoe/kayak access between the Montlake Playfield boat launch and Portage Bay.
  - Seattle Parks is just completing a large wetland restoration project along the perimeter of Montlake Playfield. There are additional wetland

L-001-004

enhancement opportunities available. Montlake Playfield should be considered for any required wetland mitigation/enhancement as part of the projects mitigation requirements.

L-001-005

- **Lake Washington Boulevard** - Lake Washington Boulevard is referred to as a city street throughout the SDEIS. The 4f evaluation fails to identify Lake Washington Boulevard as either a historic resource or a park and recreation resource. This officially designated park boulevard is a 204-acre, 9.2-mile-long linear park wholly owned by the City and under the jurisdiction of Seattle Parks and Recreation. It is a crucial element in the 1903 Olmsted Plan for Seattle's boulevard system, sometimes referred to as the "Emerald Necklace." Decisions about the future design of the SR 520 improvements must be made with the understanding that Lake Washington Boulevard was never designed to function as an extension of direct-access ramps to and from SR 520. Where Lake Washington Boulevard serves as a corridor through the Arboretum, vehicles and bicycles must be able to travel on it in a manner consistent with the design and intent of the surrounding Arboretum.
  - There should be no direct access from SR 520 to Lake Washington Boulevard. From the day it opened, SR 520 and the access ramps to and from Lake Washington Boulevard have encouraged and facilitated traffic through the Arboretum which would not otherwise be there. This increased traffic through the heart of the Arboretum limits access to the Japanese Garden from the rest of the Arboretum, reduces the air quality due to vehicle emissions, increases noise from traffic and makes crossing Lake Washington Boulevard unsafe.
- **Lake Washington Boulevard Access** - If direct access to and from Lake Washington Boulevard to SR 520 is a component of the final design of the project then the following must be considered:
  - Lake Washington Boulevard has become an extension of the on/off ramps to SR 520. Had existing environmental laws been in place, mitigation for the impacts on the Arboretum of the original 520 project would have been significant or more likely, the project would have been redesigned. If direct access to and from SR 520 to Lake Washington Boulevard remains a part of the future project, exacerbating the current condition, the Arboretum should be duly compensated for the use of the boulevard in the future.
  - As mitigation for the increased traffic on Lake Washington Boulevard directly attributable to SR 520, traffic calming measures must be implemented on the boulevard.
  - If the SR 520 project includes direct access ramps to and from Lake Washington Boulevard to SR 520, additional tolls should be included on these ramps. Tolls should be included as a way of travel demand management to discourage people from using Lake Washington Boulevard to access SR 520. Also, the revenue from these tolls should be dedicated to the Arboretum to help mitigate the impacts of the increased noise, air emissions and vehicular distraction on the physical

L-001-005

nature, educational value and visitor experience of the Washington Park Arboretum.

- The most recent data from the Seattle Department of Transportation indicates that Lake Washington Boulevard carries 16,100 vehicles.<sup>1</sup> The SDEIS indicates that the ramps to and from Lake Washington Boulevard to SR 520 carry 3,000 vehicles in the AM and PM peak hours. Given 3,000 vehicles during two hours, the total amount of traffic that uses Lake Washington Boulevard exclusively to access SR 520 could be as high as 10,000 vehicles per day. Taken together, these traffic numbers indicate that as much as 62% of the traffic which uses Lake Washington Boulevard is directly related to SR 520. While Lake Washington Boulevard is a park boulevard, it is available for City residents to use as they travel throughout the City. However, this direct use of the boulevard as an access ramp to and from SR 520 is a highway use for which the boulevard was never intended. If WSDOT intends to continue to use Lake Washington Boulevard for a highway on and off ramp, then WSDOT must compensate the City annually in the range of \$1 - \$2.1 million, based on present value and an 8% rate of return, for the use of the property in a proportional share to the percentage of traffic which uses the boulevard to access SR 520.

L-001-006

- **Washington Park Arboretum** - The Washington Park Arboretum, State Arboretum for the State of Washington, is a stunning gem in Seattle's park system. It provides respite, scenery, recreation and solace to thousands of visitors in every season of the year. It provides educational, recreational, conservation and volunteering opportunities to those who seek it out. The City of Seattle and the University of Washington have been cooperatively managing this park since the original 1934 agreement.
  - Since the SR 520 highway was opened, the Arboretum has been fractured by the highway structure itself and the noise, pollution and visual intrusion of the structure on the physical nature, educational value and visitor experience of the Washington Park Arboretum. A percentage of the tolls collected on the main line of SR 520 should be dedicated to improvements in the Arboretum as mitigation for past current and future impacts of siting a transportation facility in the heart of a natural area and arboretum.
  - The physical nature, educational values and visitor experience within the Washington Park Arboretum should be enhanced by the construction and operation of the SR 520 I-5 to Medina: Bridge Replacement and HOV project if properly designed with sensitivity to the park.
  - All efforts must be made to avoid any adverse impacts to the Arboretum, both during construction and through the long term operation of the SR 520 facility.

<sup>1</sup> Average Annual Daily Traffic (AAWDT) (5-day, 24-hour)

L-001-006

- To the extent that there will be adverse impacts to the Arboretum, every impact must be thoroughly mitigated.
- Unavoidable adverse impacts must be mitigated. Those of shorter duration must be addressed during the construction phase. Long term impacts of facilitating increased traffic through the Arboretum which has a direct impact on the physical nature, educational value and visitor experience in the Washington Park Arboretum need to be avoided through sound design or mitigated appropriately.
- Design of the new structure should address the potential for increased noise through the Arboretum as a result of the increased traffic. The project must be designed such that noise levels decrease from the levels experienced today.

L-001-007

- The project must be designed such that the visual impact of the structure complements and does not detract from the physical nature, educational value and visitor experience of the Washington Park Arboretum. Designing a “signature” bridge does not reduce the visual impact of a concrete and/or steel structure in the heart of a 230-acre arboretum.

L-001-008

- **Washington Park Arboretum Master Plan** - In May 2001, the Seattle City Council approved the long-range master plan for the Washington Park Arboretum, creating a road map for Arboretum improvements over the next 20 years. The master plan ensures the Washington Park Arboretum will effectively fulfill three primary purposes—conservation, recreation and education—for decades to come. Together, University of Washington Botanic Gardens and Seattle Parks and Recreation, with support from the Arboretum Foundation, are working to implement the master plan. Substantial public and private funds have recently been raised and spent to improve the visitors’ experience. The newly created Pacific Connection Gardens have been created, the Japanese Garden Gatehouse has been redeveloped and a number of other park improvements have been made. All these contributions will likely be negatively impacted by the proposed SR 520 project.
  - The Master Plan adopted in 2001 made note of the fact that there would be limited new buildings built within the Washington Park Arboretum. Instead, UW, the Arboretum Foundation and Seattle Parks and Recreation would address their long term need for additional educational, maintenance and classroom space by expanding into the building which currently houses the Museum of History and Industry (MOHAI), once MOHAI vacated the building. The City of Seattle owns the building which MOHAI currently occupies. Since all of the options in the SDEIS involve expansion of the roadway such that the MOHAI will be demolished, WSDOT must provide replacement space as envisioned in the Master Plan.
  - There are four significant projects at the north end of the Arboretum which are identified in the Arboretum Master Plan: complete the Waterfront Trail as a loop all the way around Duck Bay; add access,

L-001-008

sitting and viewing areas on the west side of Duck Bay; daylight Arboretum Creek; and, create an entry at the west/north end of the Arboretum with the same grand character as the south entry. The redevelopment of SR 520 has the potential to negate the potential to undertake some or all of these projects to the detriment of the Arboretum and contrary to the goals set out in the Master Plan. To the extent mitigation measures are necessary as a result of unavoidable significant impacts associated with the SR 520 project, these identified Arboretum Master Plan project should be fully funded by WSDOT for implementation by Parks and/or UW.

Adopted by the Seattle Board of Park Commissioners the 8th day of April, 2010 and signed by me in open session in authentication of its adoption this \_\_\_\_ day of \_\_\_\_\_, 2010.



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Chair of the Seattle Board of Park Commissioners

From: Kinast, Valerie [mailto:Valerie.Kinast@seattle.gov]  
Sent: Wednesday, April 14, 2010 4:22 PM  
To: SR 520 Bridge SDEIS  
Cc: O'Brien, Mike; Bagshaw, Sally; Godden, Jean; Licata, Nick; Rasmussen, Tom; Clark, Sally; Harrell, Bruce; Burgess, Tim; Conlin, Richard  
Subject: SR-520 DEIS comments from Seattle Design Commission

Please accept the attached memo as the Seattle Design Commission's comments on the DEIS for the SR-520 project. The memo is written to the Seattle City Council in response to the Nelson/Nygaard report that they commissioned, and it contains comments that speak to issues that are evaluated within the DEIS. We hope the recommendations the Design Commission sets out in the memo can inform the process and design of the SR-520 replacement project as it moves forward.

**Valerie Kinast**

Design Commission Coordinator

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# Seattle design Commission

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Mayor

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Director, DPD

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Planning Director, DPD

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## MEMORANDUM

To: Richard Conlin, President, City Council

From: Mary Johnston, Chair, Design Commission

Date: April 14, 2010

Subject: SR-520 Nelson/Nygaard Report

CC: Mayor Mike McGinn  
Diane Sugimura, Director, DPD  
Marshall Foster, Planning Director, DPD  
Peter Hahn, Acting Director, SDOT  
Barbara Wilson, Executive, Planning Commission

Dear Council President Conlin,

The Seattle Design Commission has reviewed the Nelson/Nygaard report on the SR-520 project.

We have provided recommendations in the past. From 2002 to 2006 the Commission provided feedback to WSDOT at seven briefings as design ideas evolved. In 2006 the Commission, in its review of the DEIS, expressed support of a four-lane alternative over a six lane alternative because of impacts to the Arboretum, surrounding neighborhoods, and the University of Washington. It asked that future alternatives provide: dedicated transit ramps at key junctures, lids that offer improved surface connectivity, a direct intermodal transportation connection at the University of Washington, and aggressive traffic management and congestion pricing tools. In recent years, a member of the Design Commission served with the deputy Mayor on the mediation group work, which finished its work in 2008. The Commission also provided comment on the results of the State Legislative Workgroup late last year.

The following recommendations on the ideas expressed in the recently released Nelson/Nygaard report continue our input on this project, which will be a strongly defining element of our city for many more decades to come.

### Engage an Urban Design Consultant Soon

First, the Design Commission recommends that an urban design firm with experience in knitting large scale infrastructure projects into existing

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L-002-002



L-002-002

urban fabric be brought under contract by WSDOT as soon as possible. It is imperative that there be a strong conceptual approach to how the SR-520 corridor design will fit into the well-established neighborhoods that it runs through. The Design Commission's experience reviewing the SR-519 and viaduct - tunnel portal planning endeavor have shown us the superior results that can be achieved when WSDOT engages urban designers early in the process. Instead of waiting and considering urban design as an afterthought, well thought through guiding principles can inform later stages of the project design.

L-002-003

**Provide Better Visual Communication of the Project**

Two of the main challenges of weighing the possibilities in this project are its scale and scope. Visual communication tools must be used to the fullest extent possible to break the project down to a level that people can grasp and meaningfully provide comment on it. Visual simulation videos, colorful plans, rich renderings that include realistic lighting, landscaping and signage conditions are all avenues that are becoming the standard even for highway projects in urban areas now. When creating the visual informational materials, it should be considered that Seattle's topography will make the bridge, intersections, lids etc. visible from a variety of distances and vantage points. Selection of an appropriate Urban Design consultant can greatly aid in the development of appropriate visual communication tools for the project.

L-002-004

**Support a Second Bascule Bridge Over the Montlake Cut**

The Commission supports building a second, bridge across the Montlake Cut just east of the existing bridge. In the past the Commission did not support a second bridge because of the visual impacts, but the idea proposed in the Nelson/Nygaard report is to provide for expanded transit/HOV operations and increased pedestrian and bicycling throughput across the cut in comparison to the bridge proposed in option A+.

Along with the second bridge, the Commission supports providing HOV lanes on Montlake Blvd. between SR 520 and Pacific Street and providing queue jumps for buses. One of the highest goals of the Commission since it began reviewing the project has been to provide good transit, bike and pedestrian connections between the SR-520 interchange and the University of Washington light rail station. The second bridge as proposed in the Nelson/Nygaard report would contribute significantly toward this goal and would create an important linkage between a new SR-520 bike route and the Burke Gilman trail.

L-002-005

**Support a More Urban Montlake Interchange**

The Commission supports the idea of a more urban type interchange at Montlake proposed in the Nelson/Nygaard report. This proposal adds transit lanes between SR-520 and the University of Washington, which would improve bus speeds and reliability. The idea of tightening the ramp terminal intersections shortens crosswalks, and allows for more open space and opportunities this brings. It slows vehicles, reducing noise and making the intersection more pleasant to pedestrians and bicyclists. Eliminating slip lanes makes it easier for pedestrians to negotiate the interchange.

L-002-005

Of the two "tightened" intersections, the Design Commission supports the "Transit-HOV only Ramps at E 24<sup>th</sup>" option. Although it adds vehicular traffic to the E 24<sup>th</sup> bridge over SR-520, which is now used primarily by bicyclists and pedestrians, this design reduces the amount of traffic and conflicts in the Montlake interchange shifting transit-HOV traffic from the busy intersection. The "Transit-HOV only Ramps at E 24<sup>th</sup>" option allows for larger, more contiguous lidding than the other tightened intersection proposed in the report.

**Support Shifting Access to Lake Washington Blvd. West and Traffic Management Measures to Limit Traffic Through Arboretum**

The Commission supports shifting access to Lake Washington Blvd. west of where ramps currently exist today. The location and configuration for this connection between SR-520 and Lake Washington Blvd. should be designed so that it balances the need to provide access to/from SR 520, with the goal of having a minimal design footprint and visual impact. The Commission recognizes that if this connection were removed altogether, it would result in traffic volumes being added to the Montlake interchange, which is counter to the goal of creating an interchange that is more amenable to pedestrians and bicyclists. The design of this connection should avoid impacting the arboretum and adjacent neighborhoods and utilize connections that result in minimal visual and noise impacts, and accommodate pedestrian and bicycle volumes to the greatest extent possible.

Traffic management measures should be explored to limit the volume, and speed of traffic through the Arboretum.

L-002-006

**Support Exploring a Narrower Portage Bay Viaduct**

The Commission supports continuing to explore the idea of a narrower Portage Bay segment of SR-520 as compared to the A+ option. This could include an option of narrowing to four lanes and another of providing a managed shoulder instead of a seventh lane. A smaller structure has less visual and environmental impact in this very visually sensitive location.

**Support Narrowing the Overall Width of the Corridor**

The Design Commission supports narrowing the width of the mainline bridge over Foster Island as laid out in the Nelson/Nygaard report. Narrowing the shoulders would not allow for the lanes to be used as travel lanes if the need arises, but it would lessen the overall impact of the structure. In its 2006 review of the SR-520 project, the Design Commission was strongly in favor of a four lane as opposed to six lane alternative. It should be noted that if a decision is made to add light rail along the SR 520 corridor, the width of the corridor may need to be slightly expanded for this purpose. We support designing the corridor with enough width, and structural support to allow for light rail to be added in the future with a minimal level of investment. An agreement should be drafted that states that any extra width on the newly constructed corridor cannot be used for additional traffic lanes, and instead be permanently reserved for high capacity transit.

L-002-007

**Support Exploring Noise Reduction Measures**

In its October 31, 2006 letter to WSDOT, the Design Commission



L-002-007

recommended maximizing the amount of lidding and assessing the optimal location of sound walls. It recommends sound walls be used sparingly and approached more aesthetically as design elements of the corridor. There are many attractive sound walls of glass and even including solar panels that have been built in recent years in Europe that can serve as examples for this.

The Commission would like to support the Council in encouraging the State to explore reducing the speed of traffic in all or part of the corridor as a noise reduction measure as brought up in the City Council SR 520 Committee meeting on April 5<sup>th</sup>. This might also allow for narrower lane widths and thus a narrower bridge footprint, a goal expressed by the Commission in previous reviews of the project.

Explore the use of smart highway applications, such as those being planned on the eastside and on I-5 south of downtown, that would adjust speeds to the volumes of traffic, optimizing flow.

L-002-008

#### **Montlake Triangle**

The Commission supports an at grade solution at the Montlake Triangle. At the time of its review of the University of Washington light rail station, the option of an at grade crossing was not a possibility that was on the table and the Commission recommended the pedestrian bridge over a tunnel. The Rainier Vista plans have been reviewed by the Commission and the idea of reconnecting the upper part of the axis to the triangle is supported. The Rainier Vista plans provide an important link to and between the various transit modes that will be concentrated in the area.

#### **Support for Montlake Triangle State Workgroup Process**

The Commission offers its support to Council on the Montlake Triangle workgroup process. A member of the Design Commission was active in the State SR 520 mediation group process and we hope that Council will see us as a resource in this new workgroup, legislated by the Governor last month. The Design Commission has a broad span of expertise; its membership includes a transportation engineer, urban planners and designers, a civil engineer, landscape architects, an artist, and architects.

L-002-009

#### **Conclusion**

The SR 520 project is an exciting endeavor and a great opportunity to create a state highway that is at the cutting edge of what urban infrastructure projects can be in this millennium. Seattle with its gritty history, natural beauty, and international acclaim for technology and sustainable thinking should have a highway that is beyond the ordinary. The Design Commission will continue to provide ideas that will help us achieve this.

From: Joe Willis [mailto:jwillis@medina-wa.gov]  
Sent: Thursday, April 15, 2010 2:03 PM  
To: SR 520 Bridge SDEIS  
Cc: Donna Hanson; Robert Grumbach; Bret Jordan; Doug Dicharry; Janie Lee; Mark Nelson; Shawn Whitney; Patrick Boyd; dspkep@msn.com  
Subject: SR 520 Supplemental Draft EIS comments

Attached are City of Medina comments on the SR 520, I-5 to Medina, Bridge Replacement and HOV Project Supplemental Draft EIS document.

Thank you for the opportunity to comment.

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**CITY OF MEDINA**

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April 14, 2010

Jenifer Young  
Environmental Manager  
SR 520 Project Office  
600 Stewart St., Suite 520  
Seattle, WA 98101

**RE: City of Medina Comments on SR 520, I-5 to Medina Supplemental Draft EIS**

Dear Ms. Young,

Thank you for the opportunity to comment on the Supplemental Draft EIS for the SR 520 Bridge Replacement and HOV Program. The City of Medina has the following comments:

According to the Supplemental EIS document (Chapter 1 page 1-35) and recent discussions with WSDOT and design team consultants the SR 520 project is divided into two separate projects (Medina to SR 202 Eastside Transit and HOV Project and I-5 to Medina Bridge Replacement and HOV Project), interface between the two projects occurs at Evergreen Point Road in Medina. This unfortunate circumstance subjects the City, contractors, utility managers, transit, and other agencies to scheduling and coordination headaches that are not presently defined or well

L-003-001

L-003-001 | conceived in the document. For example, closing the Evergreen Point Road Park & Ride lot and the transit stop for 4 to 6 months (Chapter 3 page 3-45) without consideration being given to the affects to local users, transit operations, and necessary bus transfers between bus routes and bus schedules is not adequately addressed, especially when two separate projects are impacting the corridor. The placement of a temporary transit stop west of the ultimate freeway lid is described in the eastside project. The completion of the transit access from the new Evergreen Point Road freeway lid to the roadway center lanes is described in the westside project. When is the Evergreen Point Road lid constructed? It is not adequately provided for in either document.

L-003-002 | Construction guidance documents that are to be drafted and provided to the design-build contractors need to define the parties, who has the authority to make decisions that override the contractors, and how those decisions are to be made in a timely manner so that all affected parties have input, are aware of the issues, and have time to prepare for the implementation. Project design oversight and processes and construction management is not defined in any of the Supplemental Draft EIS documents. Each municipality affected by the east and west side projects need the authority and avenue for affecting changes to the contractor(s) proposed methods of construction and implementation as they impact local traffic, traffic control, streets, utilities, park lands, including but not limited to construction noise, dust, and disruption of services.

L-003-003 | Comments on specific items:

1. Chapter 3 Bridge Maintenance Facility (page 3-44). The operation of the maintenance facility is not consistent with the residential character of the surrounding land uses. This is reflected in the Medina Shoreline Management Master Program which states its primary goal is to preserve Medina's shoreline for single-family residential use. There does not appear to be much of an analysis in the EIS about how the maintenance facility might affect this residential nature. While the EIS states the facility will be buried in the bank slope, comments from WSDOT staff have indicated this may not be the case. In any case, compatibility with residential uses will need to be demonstrated at the time a shoreline conditional use permit application is submitted. 150 to 200 temporary support piles mentioned in this chapter are not evaluated for impacts to the shoreline zone.

Maintenance dock. The Medina SMP states piers should be the minimum length (not to exceed 100 feet) and width necessary for reasonable use, and that the overall square footage of the pier is compatible with adequate depth of water and length of piers on similar adjacent properties. The proposal for a 100-foot in length dock is consistent with the Medina SMP, but the proposed width and overall square footage will require further analysis for its reasonableness. Near shore impacts for the proposed dock and wave barrier are not evaluated or provided in the document. The discipline reports indicated construction on the maintenance facility and dock will last 24 months. The report indicates during construction, contractors would be required to use best management practices to avoid construction effects that could harm fish habitat. However, the City would request that this be expanded to take into consideration the city's construction mitigation program where construction effects on neighboring properties are addressed.

L-003-004 | Evergreen Point Road Transit Station. (See comments above). The paragraph states that the station would be relocated to the lid in the interim. How can that happen if the lid is not yet in place either by failure of the Medina to SR 202 project to be built or by a funding short fall that delays its construction?

L-003-005 | 2. Construction Staging Areas and Haul Routes (Chapter 3): Temporary construction offices will require building permits and utility connections (no overhead services are allowed). Staging areas should be screened from residential neighboring properties. Temporary erosion control needs to installed, monitored, and maintained throughout the construction. Any work within the City rights-of-way will require permits, City inspections, and approval. Haul routes over City streets will require permits, documentation of conditions prior to use, sweeping, patching, timely repairs of any damage, and full restoration following the project.

L-003-006 | 3. Project Area's Environment (Chapter 4). Fairweather Park is described on page 4-34 and includes the an "Unnamed Stream" through the park (as described in the Medina to SR 202 Eastside Transit HOV Project) as a spring-fed stream. The spring-fed stream is primarily fed by runoff from a sizable drainage area south of SR 520 that passes under the freeway in a culvert (the present SR 520 toll plaza area also drains to this same culvert). On March 1, 2010, WSDOT made a request to me that the City replace an existing 24-inch diameter high flow storm water bypass constructed by the City in 1996 within the north margin of the WSDOT right-of-way within the northerly portion of the highway right-of-way to avoid adverse impacts to the nature preserve.

The bypass pipeline was constructed to prevent erosion of the natural unnamed stream bed within the easterly Nature Preserve portion of the park. The SR 520 existing cross culvert is proposed by the WSDOT design team to be extended to accommodate the relocated Regional Bike Path and sound walls, but no mention is made in the environmental document regarding the importance of retaining a high flow bypass that reduces the peak flows to the stream through Fairweather Preserve. Extension of the cross culvert by itself (as proposed by the WSDOT design team) without the relocation of the high flow bypass pipeline will subject the Fairweather Preserve stream to uncontrolled flows that prior to 1996 resulted in significant stream bed down cutting, sediment transport, and stream bank erosion.

The bypass pipeline was installed under Franchise Agreement No. 10240 within the northerly portion of the highway right-of-way that was already cleared and occupied by the Points Loop Trail to avoid damage to the nature preserve. Relocation now will require removal of significant trees and vegetation in order to place it outside of the proposed freeway improvements that also includes a proposed highway stormwater runoff treatment facility in that portion of the preserve next to 80<sup>th</sup> Ave NE described on page 5-122 of the document. If WSDOT truly desires to minimize adverse impacts to the Fairweather Park and Preserve, then the cross culvert diversion manhole and the relocation of the high flow bypass should be included in the Eastside SR 520 construction contract work and be completed in conjunction with the highway stormwater runoff treatment facility.

L-003-007 | Geologically Hazardous Areas: The City's critical areas regulations set forth in chapter 18.12 of the Medina Municipal Code is utilized to protect critical areas within the shoreline

L-003-007 | jurisdiction. The SDEIS does not provide enough information to determine what affects the construction of the maintenance facility and east approach project will have on the surrounding steep slopes. This will need to be evaluated as part of the shoreline permits.

L-003-008 | East Approach & Bridge Construction. Medina's shoreline jurisdiction reaches to the mid point of Lake Washington. A substantial development permit is required for this development to occur within the shoreline jurisdiction.

L-003-009 | 4. Project Operation and Permanent Effects (Chapter 5). Development of Interchange Forecasts – We are concerned about using a general growth rate to prepare the interchange forecasts. Operations at the interchanges and the adjoining intersections are directly impacted by specific intersection turning movements. Assuming general growth rates and similar turning movement ratios in developing the forecasts is an overly simplistic approach for such a detailed operations analysis. The City is concerned that growth from specific travel patterns and movements were not directly accounted for in the analysis.

L-003-010 | Economic Impact page 5 - 41 mentions parcel purchases in Medina. The City of Medina Comprehensive Plan (as amended in March 2005) in the Parks and Open Space Element includes goals and policies to acquire additional waterfront access and to develop view parks in the City. In concert with that vision, the City desires to create more park space and waterfront access by acquiring the excess portions of the State purchased parcels following completion of the freeway project to enlarge Fairweather Park and Preserve and link it with the Regional Trail, maintain existing connections with the Points Loop Trail, and to provide access to Lake Washington shoreline.

L-003-011 | Eastside Landscape Unit (page 5-77). No mitigation is proposed or described in the document for the removal of a swath of mature trees and understory on the north side of SR 520 associated with both SR 520 projects (bridge and stormwater treatment ponds adjacent to Fairweather Park and Preserve). Contrary to the statement on page 5-82 of the document, the City considers the removal of trees as a major activity that requires mitigation (Municipal Code Chapter 12).

L-003-012 | Groundwater. At present under the Medina to SR 202 project a 0.06 acre portion in the southwest corner of Fairweather Park playfield is proposed to be acquired and permanently converted to the relocated Regional Bike Path merged with the park. WSDOT recently requested an additional 0.63 acre for construction of the Evergreen Point Road lid on a temporary basis to accommodate subterranean tiebacks to support temporary shoring walls. The area requested is presently under consideration for the siting of wireless communications facilities, has trees along the frontage of Evergreen Point Road, is an active playfield, and has tennis courts in the easterly portion of the area. The document does not address these impacts. At a minimum, WSDOT must demonstrate that the temporary shoring wall and subterranean tieback supports in the upper portion of the park will not adversely affect the hydrology and groundwater contribution to the Fairweather Preserve forest and wetland ecosystem (exclusive of the high flow stormwater bypass mentioned above).

L-003-013 | 5. Effects during Construction (Chapter 6). Evergreen Point Transit Station closure (see comments in the second paragraph of this letter) will adversely affect transit ridership. Maintaining one eastside station open at all times fails to recognize the function and use of the individual transit stations. The 92<sup>nd</sup> flyer stop provides the central location for Prep School students to board buses bound for Seattle while the Evergreen Point Road transit station provides a host of diverse users and functions as a major transfer point for riders. The transit stops require greater study and attention than provided in the document.

L-003-014 | Effects on Neighborhood Streets. The projected number of truck trips (Table 6.1-4) will significantly affect the speeds of traffic and result in increased congestion on the freeway and thus result in significant backups on on-ramps and surface streets feeding to them. Since vehicles will be backed up in the NB inside lane of 84<sup>th</sup> Avenue, analysis should be given to the blocking and safety impacts problem of vehicles trying to ingress and egress from Medina Circle. In addition, vehicle queuing may at times extend past NE 24<sup>th</sup> Street and block NB left turns from 84<sup>th</sup> Avenue NE to NE 24<sup>th</sup> Street. These possible impacts are not disclosed or discussed in the analysis, and no mitigation considerations are provided to address the ultimate lane configurations and interchange operation. The City is concerned that solutions to these problems are not reflected in the proposed design or for the interim phases of the projects.

L-003-015 | Construction affecting public services and utilities (page 6-36). Utility relocation and replacement required by the project need to consider maintenance of existing services during construction and accommodate upgrades to those services as provided for in the utility comprehensive plans. Water mains for example in Medina are undersized, were constructed of AC materials that are past their projected service life, and require replacement with larger mains to provide adequate domestic and emergency fire flow demands. The SR 520 ultimate design lids will require additional irrigation water. Landscape areas along the corridor will require irrigation water. The Evergreen Point Bridge design needs to consider emergency fire protection on the bridge; none of this is addressed in the document.

Stating that franchise agreements will be utilized to relocate utilities forces utility agencies to absorb the impacts of relocating their facilities. This attempts to shift the fiscal responsibility for the relocation work from the State to the local agencies that are already taxed in a difficult financial climate, have not anticipated the cost or manpower allocation required to accommodate the freeway construction on a short time table. This will force the agencies to pass the costs onto the local rate payers. These impacts have not been addressed in the document.

L-003-016 | Construction Equipment Impacts. Medina has strict requirements on construction equipment including but not limited to weight restrictions, parking restrictions, mobilization of oversized equipment, etc. (municipal code chapter 10). These and associated construction requirements in the code will apply to all operations outside of the WSDOT right-of-ways.

L-003-017 | Be assured, the City of Medina supports the completion of the SR 520 Eastside and Westside Bridge Replacement and Transit and HOV Projects for the benefit of all, provided it is designed and accomplished in a manner that considers the impacts to local residents, mitigates the

L-003-017 | negative impacts to the greatest extent possible, taking into account the overall needs of the community of Medina no more and no less than larger municipal participants in the project.

Again, thank you for the opportunity to comment. If you have any questions, please contact me at (425) 233-6439 or [jwillis@medina-wa.gov](mailto:jwillis@medina-wa.gov).

Sincerely,

Joe W. Willis Sr. P.E., P.L.S.  
Director of Public Works  
City of Medina

cc: City Council, Donna Hanson, Robert Grumbach



# Seattle City Council

April 15, 2010

Governor Christine Gregoire  
Office of the Governor  
PO Box 40002  
Olympia, WA 98504-0002

Paula Hammond, Secretary  
Washington State Department of Transportation  
Transportation Building  
501 Maple Park Avenue SE  
PO Box 47300  
Olympia, WA 98504-7300

Jenifer Young  
SDEIS Environmental Manager  
600 Stewart St., Suite 520  
Seattle, WA 98101

Dear Governor Gregoire, Secretary Hammond, and Ms. Young:

Thank you for the opportunity to provide comments and recommendations on the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. We appreciate the support you have given to our involvement, and the structure of the work groups that were created in ESSB 6392. This letter communicates our perspective as we move into the next stage of cooperative efforts involving the State, the region, and the City of Seattle.

Our comments on the Supplemental Draft Environmental Impact Statement (SDEIS) for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project fall into four categories:

- 1) An overview of our policy approach to the project in this cover letter.
- 2) A set of formal recommendations for the SDEIS (Attachment 1) to improve the project, particularly in the Westside interchange area.
- 3) Additional recommendations for the SDEIS that include phasing the decisions relating to the construction of two specific project components (Attachment 2). The two components are the second Montlake Bridge and the 24<sup>th</sup> Avenue (Lake Washington Boulevard) ramps.
- 4) An additional recommendation for a future project to be analyzed (Attachment 3).

We are committed to moving this project forward towards a 2014 opening for the new bridge and to keeping the project within the projected \$4.65 billion budget. We support the vision of the project as a six lane corridor between Medina and I-5 that includes two dedicated high occupancy vehicle (HOV)/transit lanes. Dedicated HOV/transit lanes will immediately improve transit in the corridor and are consistent with the state legislative requirement "to accommodate light rail in the future".

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L-004-002 | The project should be designed and constructed to be ready for conversion from HOV/transit to Bus Rapid Transit (BRT), with a clear and legislatively mandated performance standard for increasing the minimum number of passengers per vehicle in HOV lanes and ultimately the conversion of the HOV/transit lanes to dedicated BRT, as envisioned in the SR 520 High Capacity Transit Plan. Such a performance standard has already been articulated in ESSB 6392, but it is an imperative that the Legislature and Governor take this standard to a level of certainty by adopting additional legislation requiring that action will be taken when appropriate thresholds are reached. It is also critical that the state identify committed revenue to fund transit for the SR 520 corridor.

L-004-003 | As we noted in our January 28 letter, "neither Alternative A+ nor M adequately meets the needs and priorities of the City of Seattle and our residents." We oppose designating Alternative A+ as the Preferred Alternative for this project, and recommend that the state identify a new alternative that includes our design alternatives.

The relatively short comment period for the SDEIS precludes the possibility of a full exploration of all possible design options and refinements for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. If accepted by WSDOT, some of the recommendations included in this letter will also require additional design work in order to determine the scale of their potential impacts and costs. Although WSDOT intends to identify a preferred design alternative for the SR 520 Bridge by April 30, 2010, it is our sincere hope that, in the weeks and months ahead, WSDOT will continue to work with the City of Seattle, Metro, ST, and UW as they refine and finalize their plans and prepare to issue a final EIS in late 2010.

Thank you for considering our comments. As the SR 520, I-5 to Medina: Bridge Replacement and HOV Project continues to move forward, we look forward to working in partnership with you to ensure the final design for the corridor is sensitive to the needs of the Seattle communities that surround it.

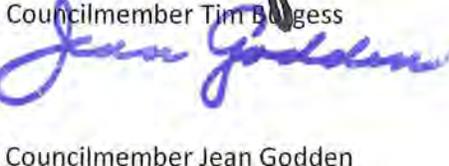
Sincerely,

  
Council President Richard Conlin

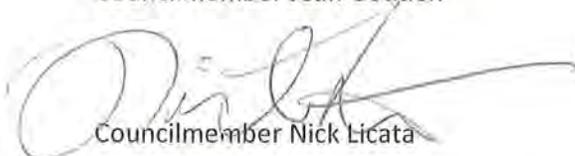
  
Councilmember Sally Bagshaw

  
Councilmember Tim Burgess

  
Councilmember Sally J. Clark

  
Councilmember Jean Godden

  
Councilmember Bruce Harrell

  
Councilmember Nick Licata

  
Councilmember Mike O' Brien

  
Councilmember Tom Rasmussen

## ATTACHMENT 1: COMMENT LETTER FOR THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT (SDEIS)

Following the Washington State Department of Transportation's (WSDOT) release of the SDEIS in January 2010, the Seattle City Council initiated a two month review and assessment process that was intended to inform the content of this letter. As part of that effort, we hired transportation consultants from Nelson\Nygaard and also worked closely with the Seattle Department of Transportation (SDOT), WSDOT, Sound Transit (ST), King County Metro (Metro), and the University of Washington (UW). Our key goals for the review and assessment process were to develop specific design recommendations for the new SR 520 Bridge that would help improve transit service and connectivity, the pedestrian and bicycle environment, neighborhoods, traffic operations, and open space in the vicinity of the corridor. We also identified the following four assumptions to help guide the development of any new design elements and/or system-level alternatives that might emerge from our SDEIS review process:

- 1) Between Medina and I-5, SR 520 will have a total of six travel lanes, including four general purpose lanes (two in each direction) and two high occupancy vehicle (HOV) or transit lanes (one in each direction);
- 2) The total budget for SR 520 corridor improvements, including mitigation, will not exceed \$4.65 billion;
- 3) No additional environmental impact assessments, including the publication of an additional SDEIS, will be necessary; and
- 4) The design alternatives evaluated as part of this process will generally be within the scope of either the DEIS or SDEIS that WSDOT has already completed for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project.

We believe that most of the recommendations included in this letter are substantially within the framework and intent of these baseline assumptions. Each of our recommendations is designed to significantly improve the portion of the SR 520 corridor that extends through the City of Seattle. Consistent with the ongoing design refinement process described in ESSB 6392, we would welcome an opportunity to continue working with the State to analyze the potential outcomes of the policy and design options we are supporting in this letter.

Our recommendations are as follows:

### Design Recommendations

- ***Construct the replacement corridor in a six-lane configuration.***  
We reaffirm our position that the replacement corridor should be designed to accommodate no more than six lanes of traffic, including two lanes for transit and HOV and four lanes for general purpose traffic.
- ***Locate Westside interchange at Montlake, with conditions.***  
More than 50 percent of the current daily traffic on SR 520 uses the existing Montlake interchange. The interchange, which is located just south of the Montlake Cut, offers convenient access to several institutions and amenities that draw visitors and employees from across the region, including UW and the Washington Park Arboretum. However, the interchange is also sited in the heart of Seattle's historic Montlake neighborhood, where it abuts the community's commercial district on 24<sup>th</sup> Avenue East. If a new, replacement interchange is to be sited in Montlake, the following elements should be incorporated into its design:
  - 1) The interchange must be redesigned to reduce the overall footprint, to be more compatible with the Montlake community, scaled to its location within a neighborhood, and organized to promote the most effective pedestrian, bicycle, and transit connections. We request that continued collaboration occur between WSDOT, SDOT, and if appropriate, consultants to redesign the interchange to operate as an urban intersection, not a

L-004-005

highway interchange. Options for a redesigned interchange should include a tightened intersection, a diverging diamond configuration, and loop ramps under the east end of the Portage Bay Bridge.

Ramp intersections should also be tightened and slip ramps eliminated. These design refinements will help to improve bicycle and pedestrian safety along Montlake Boulevard and support creating an interchange that is more suitable for a neighborhood setting like Montlake.

L-004-006

- 2) New HOV/transit-only ramps should be located at 24<sup>th</sup> Avenue East rather than at Montlake Boulevard. Placing the HOV/transit-only ramps at 24<sup>th</sup> Avenue East would require buses and carpools traveling between SR 520 and the UW and Montlake areas to drive about two blocks farther in order to utilize a direct access ramp. However, locating the HOV/transit-only ramps at 24<sup>th</sup> Avenue East would create an opportunity to construct a large lid over SR 520, between Montlake Boulevard and 24<sup>th</sup> Avenue East that would not be bisected by any vehicle lanes.

L-004-007

- 3) A new lid over SR 520, between Montlake Boulevard and 24<sup>th</sup> Avenue East, would create a buffer between the Montlake neighborhood and SR 520. It would also enhance the bicycle and pedestrian environment on Montlake Boulevard. Bus stops should be included on this lid.

L-004-008

- 4) Priority signals for transit should be provided at key intersections in the vicinity of the Montlake interchange. These include the intersection of Northeast Pacific Street and Montlake Boulevard, and intersection at the north end of the Montlake interchange. This form of signalization, also referred to as a "queue jump," would allow buses to clear busy intersections before other traffic is allowed to move.

L-004-009

- 5) Dedicated HOV/transit lanes should be provided on Montlake Boulevard. At a minimum, these lanes should extend from the intersection of Northeast Pacific Street and Montlake Boulevard to the intersection of 23<sup>rd</sup> Avenue and Lake Washington Boulevard.
- 6) WSDOT should also commit to working with SDOT to consider extending the dedicated HOV/transit lanes on Montlake Boulevard to the north, and on 23<sup>rd</sup> Avenue to the south. The southern corridor should be reviewed as far as the intersection of Madison and 23<sup>rd</sup> Avenues.

L-004-010

- 7) The High Capacity Transit Plan for SR 520 lacks specificity with regard to service availability, particularly mid-day, over the phase-in of new transit service on SR 520. WSDOT should work with Metro and ST to ensure that there will be an adequate base level of mid-day service between the UW/Montlake area and the Eastside when the current flyer stop is closed. A specific transit service plan for the ramp up to and duration of construction of the corridor should also be developed. A reduction in frequent and reliable service is unacceptable. WSDOT is heavily dependent upon the implementation of new transit service in order to meet the corridor's purpose of improving mobility for people across Lake Washington. As a result, we believe more specific commitments to transit service investments need to be sought from Metro and ST.

L-004-011

- 8) WSDOT should set a goal of identifying design alternatives that would reduce the number of general purpose lanes exiting westbound SR 520 at Montlake Boulevard from two to one.

L-004-012

- ***Direct project mitigation funds to the Montlake Triangle area.***  
The Montlake Triangle, at the intersection of Montlake Boulevard and Northeast Pacific Street, is a heavily traveled area that will be significantly impacted by the replacement and expansion of the SR 520 corridor. As such, the Montlake Triangle, which is a major pedestrian and transit hub and will soon be home to the U-Link light rail station, should be a strong candidate for project mitigation funds. Consistent with ESSB 6392, we also look forward to convening a work group to study and make recommendations about transit connections in this area. One of the Council's primary goals for this work is to identify ways to reduce the walking distances between all the transit modes that will serve the Montlake Triangle into the future and to improve the pedestrian environment in this area.

L-004-013

- **Minimize the height of the cross-lake bridge deck.**

The SDEIS considers a 32-foot high bridge deck on the cross-lake, floating portion of the SR 520 Bridge. At more than 20 feet higher than the existing bridge deck, 32 feet is unacceptable. A bridge height of 32 feet would have significant, negative visual impacts and degrade important scenic and historic viewsheds from the Washington Park Arboretum, UW, and along Lake Washington Boulevard. We recommend that the height of the replacement bridge deck be lowered to as close to 20 feet as possible without compromising the safety of the corridor.

L-004-014

- **Split the bridge corridor and narrow shoulders through the Arboretum.**

To minimize impacts on the Arboretum and provide for the daylighting of the area underneath the bridge, the eastbound and westbound lanes on SR 520 should be split through Foster Island and as much of the Arboretum as possible. This design modification is important to ensure that the corridor can accommodate light rail in the future. The gap should be as wide as feasible without interfering with traditional cultural property. The amount of pavement should be reduced by narrowing the shoulder width by two feet on each side of both eastbound and west bound lanes, for a total pavement reduction of 8 feet through the Arboretum.

L-004-015

- **Reduce the width of the Portage Bay Bridge.**

In the SDEIS, Option A+ calls for a seven lane configuration across Portage Bay from Montlake to I-5. This configuration includes four general purpose lanes, two HOV/transit lanes, and one westbound auxiliary lane. We support eliminating the auxiliary lane and replacing it with a managed shoulder that could be used as a traffic lane during peak travel times. Adoption of this concept could reduce the footprint of the Portage Bay Bridge.

L-004-016

- **Ensure that the new bridge is designed and constructed to accommodate high capacity transit.**

In 2008, average weekday transit ridership on the SR 520 Bridge was about 15,000. By 2020, that figure is expected to increase to 25,000 daily riders. As the demand for transit service along the SR 520 corridor continues to climb, the new bridge should be designed and constructed in a manner that will accommodate appropriate new modes of high capacity transit, including dedicated BRT and/or light rail.

With regard to accommodating light rail along the SR 520 corridor, we support maintaining flexibility for the region to make this decision at a later date. We also encourage WSDOT, ST, and the Federal Highway Administration (FHWA) to evaluate the potential for a future cross-section for the floating bridge that could accommodate four lanes of vehicular traffic (two in each direction), two lanes of light rail (one in each direction), and a bicycle and pedestrian pathway within a 115-foot wide right of way.

A report by Nelson/Nygaard that was commissioned by the Seattle Mayor's Office identified three possible issues that could compromise the ability of SR 520 to accommodate future light rail:

- 1) A gap between the eastbound and westbound lanes on SR 520 would need to extend through the Arboretum in order to allow light rail. The Council has already recommended this gap and we endorse this element, which could be included under the current SDEIS and without delaying the project.
- 2) The roadway on the bridge deck would have to be expanded to 125 feet in order to allow for light rail. The Council and the neighborhoods adjacent to SR 520 have worked for years to narrow the bridge design to minimize its footprint and impacts and to minimize the possibility of restriping the bridge for additional vehicle lanes. We note that light rail is being added to the I-90 corridor through design modifications with the approval of FHWA, WSDOT and ST that allow for narrower shoulders than the cross section of SR 520 in the Mayor's report. Given this precedent, as well as information from WSDOT that adding additional width would be feasible if desired, the Council does not support widening the bridge deck to 125 feet at this time. It appears that the current floating bridge design with the addition of the split corridor design modification would be compatible with light rail. The Council is committed to minimizing the footprint and avoiding significant delay of the project.

L-004-016

- 3) Additional pontoons would be required to support the weight of light rail on the bridge. WSDOT has indicated that the design would support the additional pontoons and that there are no technical reasons that require adding them at the current time. Adding pontoons now would require additional environmental work and delay the project. Given that the region has not decided to construct light rail on the corridor, it would not be an appropriate use of limited public funds to include the pontoons in the current project or delay the project to complete the required environmental analysis.

There is no current plan for light rail on this corridor. That option was deferred by the ST Board through the ST planning process. The ballot measure that passed in November 2008 includes significant increases in funding for bus operations on the SR 520 corridor. Additionally, the Lake Washington Urban Partnership is funding the capital costs for 45 new buses dedicated to this corridor and Metro is dedicating funding for expansion of bus service. Buses may provide a more flexible and effective form of high capacity transit for this project area.

If the region were to proceed with light rail on the SR 520 corridor, there would have to be additional environmental assessment, routes determined for light rail to traverse after leaving the corridor, a funding plan approved by voters, and design and engineering work.

We therefore recommend that the design for the SR 520 corridor accomplish the following in order to meet the legislative requirement to accommodate light rail:

- 1) Ensure that no substantial element of the corridor, such as overpasses or highway portions, would have to be demolished and rebuilt in order to construct light rail.
- 2) Include the recommended gap between the eastbound and westbound lanes in the Arboretum area.
- 3) Have a design plan that includes light rail on the current 115-foot wide bridge corridor and/or that permits adding additional width without demolishing or rebuilding the bridge deck.
- 4) Ensure that the pontoons are designed so that the additional stabilization pontoons can be added without major disruption of the corridor or significant modification of the existing pontoons.

L-004-017

- ***Enhance the streetscape along Montlake Boulevard and in the vicinity of the Montlake interchange.***  
Montlake Boulevard is a heavily traveled arterial that is also an important corridor for pedestrians and bicyclists. Improving lighting, signage, landscaping, and bicycle and pedestrian facilities along Montlake Boulevard and in the vicinity of the Montlake interchange would help to make this area more "human scale" and enhance its safety for those who are traveling by foot or by bike. This area should be designed in accordance with the Olmsted plan for Montlake Boulevard and Montlake Boulevard should have a fully landscaped median.

- ***Design bicycle and pedestrian facilities along the SR 520 corridor to City of Seattle standards at all locations.***

The planned bicycle and pedestrian route along the SR 520 corridor, from Seattle to Medina, is an important component of the design for the new bridge. This new facility will expand recreational and commuting opportunities for residents on both sides of Lake Washington and complete a critical link in our region's expanding network of bicycle and pedestrian paths. New connections on Montlake Boulevard, connections west of Montlake Boulevard to the Montlake Playfield and bicycle corridors to Capitol Hill, and connections north of the Montlake Boulevard/Pacific Street intersection to the Burke Gilman Trail and the University of Washington should include minimum widths of 16 feet for major pedestrian routes and 12 feet for major bicycle routes. Design modifications should be identified, if needed, for these routes.

L-004-018

- ***Develop a noise mitigation plan for SR 520 in partnership with nearby residents.***

We fully support WSDOT's plans to develop a noise mitigation plan for SR 520. Residents of the neighborhoods adjacent to the corridor should have an opportunity to participate in this planning process. In addition to federally recognized noise mitigation measures, the plan should include new and innovative practices that have the potential to effectively reduce noise impacts. We also encourage WSDOT to fully

implement the recommendations from the Health Impact Assessment that was completed for SR 520 in 2008 by Seattle-King County Public Health and the Puget Sound Clean Air Agency.

- ***Review and improve plans for managing the impacts of construction in the new SR 520 corridor in partnership with nearby residents, institutions, and businesses.***

The impacts of construction, including truck traffic, will be significant in neighborhoods around the 520 corridor. WSDOT should carefully review the construction management plan for SR 520 and coordinate with the agencies that are managing other nearby projects (such as University Link) to minimize impacts.

### Policy Recommendations

- ***Develop and implement a corridor management plan that includes minimum performance standards for transit/HOV and general purposes lanes with triggers for mandatory actions to maintain those standards.***  
Consistent with ESSB 6392, we concur that WSDOT should develop performance standards for the HOV/transit lanes on SR 520. We recommend that WSDOT develop a corridor management plan, to be adopted by the Legislature and approved by the Governor that states a minimum performance standard that ensures speeds in the HOV/transit lanes do not fall below 45 miles per hour more than 5 percent of the time during peak hours as measured and reported quarterly. If the performance standard is not met, mandatory triggers should be in place to increase the minimum number of passengers per vehicle in the HOV lanes or conversion of the HOV lanes to transit only lanes should occur. We also recommend that as part of the corridor management plan, performance standards be developed for the general purpose lanes on SR 520. We support the potential use of dynamic variable tolling along the entire corridor that would allow for increasing toll rates in order to achieve specific performance standards for general purpose as well as HOV/transit lanes. To ensure that these standards are enforced, legislation needs to be adopted mandating the triggers for actions to meet these performance goals.

ATTACHMENT 2: COMMENT LETTER FOR THE SUPPLEMENTAL DRAFT ENVIRONMENTAL IMPACT STATEMENT WITH PHASING RECOMMENDATIONS

L-004-021

- ***Phase the decision on construction of the proposed second bascule bridge at Montlake Boulevard and test measures that may eliminate the need for construction. Require that the bridge be designed to provide priority for transit, pedestrian, and bicycle traffic if it is constructed.***

We continue to have reservations about the potential construction of a second bascule bridge across the Montlake Cut at Montlake Boulevard. Building a parallel bascule bridge at Montlake will likely necessitate the removal of two residential properties and further divide the Shelby-Hamlin neighborhood, which is already bisected by a 4-lane Montlake Boulevard that is traveled by more than 50,000 vehicles each day. If a second bascule bridge is to be constructed at Montlake, we recommend it be built to meet the following conditions:

- 1) The second bridge should be built to accommodate no more than two lanes of traffic and include dedicated bicycle and pedestrian facilities. In order to reduce additional negative impacts on the Shelby-Hamlin neighborhood, the footprint of the new bridge should be as narrow as possible without compromising the safety of Montlake Boulevard, transit operations, or Seattle standards for bicycle and pedestrian facilities.
- 2) The existing Montlake Bridge should remain a 4-lane roadway.
- 3) If the second bridge is completed, the two crossings should operate in a 4+2 configuration, with four general purpose lanes and two dedicated HOV/transit lanes. If possible, the dedicated HOV/transit lanes should be located on the original bridge, with the northbound lane operating as a counterflow. This will allow center line operation, permit the use of existing electric wires, and avoid the installation of new electric wires on the new bridge.

*We will only consider supporting the construction of a second bridge across the Montlake Cut if the additional bridge is used to provide the capacity for dedicated facilities for HOV, transit, bicyclists, and pedestrians. We do not support the creation of additional roadway capacity along Montlake Boulevard for single occupant vehicles and other general purpose traffic.*

In order to determine whether the second bridge is needed, WSDOT, SDOT, Metro, and ST must work together to design and test systems that will facilitate the movement of transit through the Montlake corridor, such as signalization, signal timing, signal queue jumping for HOV/transit, dedicated HOV/transit lanes, and other techniques. WSDOT, SDOT, and Metro should identify and analyze traffic management options/plans for the entire neighborhood, including specifically the corridor between University Village and 23<sup>rd</sup> and Madison, and assess their impacts on arterials and neighborhood streets. The goal of the testing program should be to determine whether a combination of strategies can ensure the reliable movement of both transit using the SR 520 corridor and north-south transit through the City of Seattle.

L-004-022

- ***Reconfigure the ramps between SR 520 and Lake Washington Boulevard and develop a traffic management plan for the Washington Park Arboretum. Phase the decision on the construction of these ramps, test the effectiveness of a traffic management plan and other measures to protect the Arboretum, and ensure reliable movement of transit and other vehicular traffic through the 23<sup>rd</sup> Avenue/Montlake corridor.***

The 230-acre Washington Park Arboretum is one of the most cherished parks in the Puget Sound region and protecting its character and fragile environment is one of the City Council's top priorities for the SR 520, I-5 to Medina: Bridge Replacement and HOV Project. In addition to serving as a "living museum" of diverse plant species that draws visitors from around the world, the Arboretum also provides needed open space and recreational opportunities for thousands of nearby residents. After carefully considering the trade-offs associated with including ramps between SR 520 and Lake Washington Boulevard near the western edge of

the Arboretum, we have concluded that if ramps are built in this area, they must meet the following conditions:

- 1) The ramps must be reconfigured to connect to Lake Washington Boulevard at 24<sup>th</sup> Avenue East, thereby supporting the goal of constructing a larger, uninterrupted lid over SR 520 between 24<sup>th</sup> Avenue East and Montlake Boulevard, and avoiding the presence of ramps in the Arboretum.
- 2) A partial lid that extends east over the eastbound lanes of SR 520, from 24<sup>th</sup> Avenue to the Arboretum, should be constructed to help improve pedestrian connections to the Arboretum trail system.
- 3) WSDOT must agree to work with the City of Seattle to develop and implement a traffic management plan for the Arboretum. Such a traffic management plan would apply to the area that is bounded by SR 520 to the north, Lake Washington Boulevard to the east, Madison Street to the south, and 23<sup>rd</sup> Avenue to the west. The traffic management plan may include, but need not be limited to, traffic calming, tolling, reduced speed limits, and ramp use restrictions.
- 4) As part of the traffic management plan, the existing on- and off-ramps in the Arboretum should be closed early in the SR 520 project's construction phase. The need for replacement ramps would then be reassessed once construction is nearing completion.

The Council wishes to implement this traffic management plan as quickly as possible and analyze the outcomes. Measurable goals should be set in consultation with the Arboretum Foundation, WSDOT, Metro, and SDOT, and sets of measures should be tested until the goals are effectively met. Implementation should proceed in conjunction with the work on 23<sup>rd</sup> and Montlake Avenues, and goals should include effective management of that corridor as well.

L-004-023

**ATTACHMENT 3: RECOMMENDATION FOR A FUTURE PROJECT TO BE ANALYZED**

***Evaluate a HOV/transit fixed span bridge at a location east of Montlake Boulevard. This option is not included in the current SDEIS but offers potential future benefit and should be evaluated as a separate project.***

There are still major concerns about whether the configurations included in the SDEIS will actually be able to successfully facilitate the movement of traffic through the Montlake area, especially transit. We recommend that the state begin a process to review a possible high bridge to the east of Montlake Boulevard, between the MOHAI building and Marsh Island. Such a bridge would be an important option to provide a future light rail or bus rapid transit connection to Pacific Street and the University Link light rail station. Completing an environmental assessment of this potential bridge crossing could be very useful in developing future transportation plans for this area, especially if this project ultimately does not proceed with some of the elements that have been identified for possible phasing and further study. We recommend that the environmental analysis for a high HOV/transit bridge east of Montlake Boulevard be undertaken before the construction plans for SR 520's west approach are finalized.



## King County

### Department of Transportation

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Phone: (206) 684-1481  
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April 15, 2010

Jenifer Young  
SR 520, I-5 to Medina Bridge Replacement and HOV Program  
Environmental Manager  
SR 520 Project Office  
600 Stewart Street, Suite 520  
Seattle, WA 98101

Dear Ms. Young:

L-005-001 | The King County Department of Transportation (KCDOT) is pleased to submit comments on the State Route 520, I-5 to Medina Bridge Replacement and High Occupancy Vehicle (HOV) Project Supplemental Draft Environmental Impact Statement (SDEIS). As a cooperating agency, we have provided comments on the internal SDEIS draft as well as each of the discipline reports, and appreciate that the majority of our previous comments have been adequately addressed in this document.

Currently, King County Metro Transit and Sound Transit carry over 14,000 people a day traveling on SR 520 and an additional 7,000 riders on Montlake Boulevard daily. In addition, bus service will be added to this corridor as part of the SR 520 Urban Partnership. Funding generated by the one-cent per one-thousand dollars assessed value property tax increase, approved by the King County Council, will implement 28,000 new service hours and the Sound Transit 2 (ST2) plan will fund an additional 20,000 new service hours; a total 20 percent increase in transit service in this corridor.

Regardless of mode, improving mobility for people and goods across Lake Washington remains a major purpose of this project, along with improving safety and reliability in the corridor. The preferred alternative should include elements that support transit operations in the SR 520 corridor and on Montlake Boulevard by minimizing travel times and maximizing reliability for both local and cross-lake transit service. Our highest priority interests are summarized below.

#### **Light Rail and Bus Rapid Transit:**

In the near term, bus service will be the primary mode of transit across SR 520, with the potential for light rail across the bridge in the future. The Washington State Legislature passed legislation for a design of the SR 520 Bridge that includes four general purpose lanes and two HOV lanes that accommodate high capacity transit, supporting a bus rapid transit system with the potential for future light rail. The current design of the SR 520 Bridge Replacement and HOV Project

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L-005-001 includes elements that support bus services, including completing the HOV lane system through the corridor and providing direct access ramps. The regional transportation plan, Transportation 2040, developed by the Puget Sound Regional Council, identifies SR 520 as a busway for regional express service. Voter approval of the ST2 plan in 2008 supports additional express bus service investments in the corridor and the study of light rail on SR 520, in addition to the construction of light rail on the Interstate 90 Bridge.

Additionally, the SR 520 High Capacity Transit (HCT) plan, developed by the Washington State Department of Transportation (WSDOT), the University of Washington, Sound Transit, and King County Metro Transit, calls for bus rapid transit on the SR 520 corridor beginning in 2016. The HCT plan includes five bus rapid transit lines with fast, frequent, reliable transit service including transit priority treatments and high quality passenger facilities. This increase in the corridor's transit service and capital investments exceeds current available transit funding. The service improvements on SR 520 from King County's property tax, ST2, and the WSDOT capital improvements in transit facilities, are an initial investment toward bus rapid transit in the corridor.

For the near term, buses will be the primary mode of transit on SR 520. The bridge design needs to include bus transit supportive features to assure effective transit operations. That said, design elements that facilitate future conversion to light rail across SR 520 should be considered. Improvements to accommodate light rail will need to be weighed against their effect on current transit operations and cost. The evaluation should include possible light rail impacts on bus operations in the corridor and identifying the potential facilities necessary to provide reliable connections between light rail and buses.

### **Montlake Corridor:**

L-005-002 Montlake Boulevard is a crucial transit corridor with over 590 local and regional transit trips daily, connecting riders between the University District and other Seattle neighborhoods and Eastside communities. All SR 520 alternatives should maintain operating efficiency of regional and local transit operations on Montlake Boulevard by including measures that prevent increased travel times for over 12,000 regional and local transit riders in this corridor daily. Maintaining transit reliability in this corridor can best be achieved with a plan that considers the following elements:

- *A westbound auxiliary lane on the Portage Bay Bridge:* This would prevent delay on Montlake Boulevard as a result of SR 520 westbound on-ramp congestion.
- *HOV and transit priority treatments on 23<sup>rd</sup> Avenue and Montlake Boulevard:* Inclusion of transit lanes, transit signal priority, and queue jumps all could help keep local and cross-lake transit moving through the Montlake corridor.
- *Multiple access points for SR 520:* In order to manage the traffic on Montlake Boulevard, a major local and regional transit corridor, WSDOT should include multiple access points to and from SR 520 and a traffic management plan for the westside of Lake Washington as explained in our attached comments.

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L-005-002 | If any of these elements are not included, increased emphasis on other transit supportive measures is critical to maintain transit speed and reliability in this corridor.

**Direct Access HOV Ramps at Montlake Boulevard:**

L-005-003 | Direct Access HOV ramps connecting Montlake Boulevard and SR 520 are a critical component of the design. These ramps would improve the speed and reliability of transit connections between Eastside communities and the University District for bus riders on SR 520 cross-lake services. Without the ramps, buses would need to weave through general purpose traffic from the SR 520 HOV lanes to exit and enter Montlake Boulevard. These movements would not only negatively impact transit, but also obstruct general purpose traffic.

**Montlake Triangle:**

L-005-004 | Under each of the SR 520 alternatives, the Montlake Triangle is a crucial multimodal connection point. Traffic operations around the Montlake Triangle are critical because all modes of travel, including bicyclists, pedestrians, vehicles, and buses, converge at this point when traveling on Montlake Boulevard. With the loss of the Montlake Freeway Station, more buses, pedestrians, and cyclists will move through the Montlake Triangle to make connections to buses, light rail, and the University of Washington. The SR 520 project should include investments in the triangle to facilitate enhanced connections between transit and other modes of travel, improve the waiting environment for passengers, and provide safe and direct pedestrian connections between transit and the University of Washington health facilities and the main campus.

**Loss of the Montlake Freeway Station:**

L-005-005 | The removal of the Montlake Freeway Station will result in the loss of access to 355 daily bus trips for walkers, cyclists, and local bus riders. To preserve this critical transit connection, additional direct service between Eastside communities and the University District is needed, especially in the non-peak period. The cost of service to mitigate the loss of the Montlake Freeway Station is \$3 to \$5 million annually, which remains unfunded. This funding is needed in addition to revenues that will be generated by the one-cent per one-thousand dollars assessed value property tax increase the King County Council approved to implement SR 520 Urban Partnership service in 2010.

Part of the function of the Montlake Freeway Station can be replaced by enhancing the Eastside's Evergreen Point Freeway Station on SR 520, which is part of the SR 520 Eastside Transit and HOV Project. The KCDOT and the WSDOT continue to work together to ensure this station is designed to accommodate the expected increase in transfer activity due to the closure of the Montlake Freeway Station.

**Mitigation:**

L-005-006 | The Final Supplemental Environmental Impact Statement (FSEIS) should clearly state WSDOT's commitment to mitigate the effect of construction on transit operations, trolley infrastructure, and the impacts of increased transit demand and operating costs resulting from construction activities and system reconfiguration. The KCDOT is interested in working with WSDOT to determine the

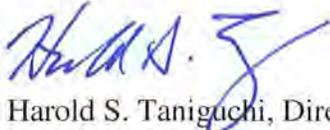
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L-005-006 | impacts and appropriate service additions needed to maintain the movement of people and goods in the corridor for inclusion in the preferred alternative.

The KCDOT will continue to be an active partner in the SR 520 Project as it moves forward, participating in work groups as identified in the approved Senate Bill 6392 to assess SR 520 design modifications, transit connections, and to identify a plan for financing high capacity transit in the corridor.

We hope these comments prove helpful as the FSEIS is finalized. We have attached additional technical comments regarding specific sections of the SDEIS for your consideration. We look forward to continuing to work with WSDOT to refine the project's design and improve its utility for optimizing regional mobility, especially the speed and reliability of public transportation.

Sincerely,



Harold S. Taniguchi, Director  
King County Department of Transportation

#### Attachments

cc: Chris Arkills, Transportation Policy Advisor, Office of Executive Dow Constantine  
Laurie Brown, Deputy Director, King County Department of Transportation (KCDOT)  
Ron Posthuma, Assistant Director, KCDOT  
Kevin Desmond, General Manager, Metro Transit Division, KCDOT

**SR 520, I-5 to Medina Bridge Replacement and HOV Project  
King County Department of Transportation's Comments on Supplemental Draft EIS**

The following comments address suggested corrections and other remaining unresolved issues intended to make the document easier to understand and more useful as a decision-making tool.

- |           |     |          |  |
|-----------|-----|----------|--|
| L-005-007 | 1.  | p. 2-17: | On Exhibit 2-9, Option L cross-section 3 does not but should show the bike path.   |
| L-005-008 | 2.  | p. 2-19: | A graphic comparable to Exhibit 2-10 needs to show the Option A suboptions.  |
| L-005-009 | 3.  | p. 2-27: | The description of the Option A suboptions needs to mention that the eastbound direct-access ramp would eliminate the weave for eastbound buses, as this is important for function and safety.   |
| L-005-010 | 4.  | p. 2-19: | Exhibit 2-16 appears to illustrate that the added eastbound direct-access ramp (in Option A) would pass under Montlake Boulevard.  |
| L-005-011 | 5.  | p. 2-34: | <i>2.4 Could the project be built in phases?</i> Given that only floating bridge construction has been funded to date and the project suffers from a \$2.36 billion funding gap, the phased implementation scenario appears to be as or more likely than construction of the complete project for the foreseeable future. As a result, the FSEIS should provide a more detailed analysis of phased construction and associated impacts following selection of the preferred alternative. |
| L-005-012 | 6.  | p. 2-39: | Exhibit 2-22 provides important information (see comment regarding page 5-153) but the map scale needs to be larger than 1"= 400' with appropriate labels in order to be legible.  |
| L-005-013 | 7.  | p. 4-5:  | Text correctly references 2009 transit ridership data but there is a typo on the source citation listing "2007".   |
| L-005-014 | 8.  | p. 4-6:  | Exhibit 4.1-4 should show trolley wire. (King County can provide this data layer.)   |
| L-005-015 | 9.  | p. 4-6:  | Exhibit 4.1-5 shows that eastbound boarding's at the Montlake Freeway Station are high in both peaks. This demonstrates the importance of riders wanting to board buses in the University District to go to the eastside. It also explains why the eastbound direct access ramp as part of Sub-option A and the transit pathway from the Montlake Triangle to SR 520 are important.  |
| L-005-016 | 10. | p. 4-8:  | Is the Evergreen Point Station within the study area of this project? If it indeed is included in the study area, then it should also be mentioned as a second freeway station on page 4-5.  |

- L-005-017 | 11. p. 4-9: Exhibit 4.1-7 needs to show the bus stop on the west side of Montlake Boulevard by the east-bound onramp as shown in Exhibit 4.1-4.
- L-005-018 | 12. p. 4-25: King County Wastewater Treatment Division's sewers run parallel with Montlake Boulevard, on the west side, and are of brick construction. No construction activity will be allowed over or immediately adjacent to these facilities. These pipelines must remain in service at all times and cannot be re-routed or relocated.
- L-005-019 | 13. Chapter 5: Option A with the sub-options needs to be fully represented and analyzed throughout the FSEIS, especially in the *Project Operation and Permanent Effects* chapter where the relative impacts and benefits of the sub-options should be better quantified. For example, inclusion of the replacement Lake Washington Boulevard ramps in Option A would significantly reduce traffic congestion on Montlake Boulevard and thus improve transit reliability, decreasing travel times for transit and general purpose traffic by almost 50%. Replacement of the Lake Washington Boulevard ramps would result in similar levels of traffic through the Arboretum as in the No Build Option, which assumes existing Lake Washington Boulevard ramp configurations.
- L-005-020 | 14. p. 5-1: The first sentence of the transportation analysis reads "The first step in analyzing traffic is to determine how much traffic is predicted to grow in the region." Is the transportation analysis about measuring traffic, i.e. cars or about travel, i.e. people throughput?
- L-005-021 | 15. p. 5-3 The description of RapidRide (under *King County Metro's Transit Now*) should be broadened. The Bellevue-Redmond RapidRide B-Line provides connections between Downtown Bellevue and Downtown Redmond, via NE 8<sup>th</sup> Street, 156<sup>th</sup> Avenue NE, and 148<sup>th</sup> Avenue NE, including intermediate destinations of Crossroads and Overlake.
- L-005-022 | 16. p. 5-4: The information on pedestrian connections at the Montlake Triangle should be updated according to the University of Washington's Rainier Vista plan, which is anticipated to start construction in 2011. The Rainier Vista project and its final design should be considered as the baseline condition for the Montlake Triangle since construction is expected to be completed in 2012.
- L-005-023 | 17. p. 5-6: Under all options, traffic volumes will still exceed capacity, even after full build out. The Final SEIS should indicate the need for more aggressive TDM activities and additional transit services to be implemented to further help manage the excess demand over the long term.
- L-005-024 | 18. p. 5-10: The preferred alternative needs to include a westbound auxiliary lane at Portage Bay, on and off ramps to and from Lake Washington Boulevard and transit priority or other elements that will reduce traffic congestion impacting key intersections.
- L-005-025 | 19. p. 5-19: *How would the project affect transit facilities and service?* This section should also discuss the transit facilities included with the A sub-options (Option A+),

- L-005-025 | which includes an HOV/transit direct access ramp in the eastbound direction, in addition to the westbound transit-only off ramp at Montlake Boulevard included in Option A.
- L-005-026 | 20. p. 5-21: *Option A Suboptions:* This discussion should quantify the significant savings in transit travel times that would result from the Lake Washington Boulevard ramps and the transit direct access ramp.
- L-005-027 | 21. p. 5-23: The analysis of transit performance should quantify impacts to address the number of impacted routes, riders, trips and amount of additional service hours to mitigate these impacts. At a minimum, the parameters addressed in Exhibit 4.1-5 should serve as the basis of this analysis.
- L-005-028 | 22. p. 5-24: *University District Service:* This section notes that King County Metro routes 261 and 271 will not longer be accessible from Evergreen Point Freeway Station. This section should include language that Metro will be evaluating routing options related to these routes serving Evergreen Point Freeway Station. Metro will be considering routing options to allow both these routes to serve the Evergreen Point Freeway Station.
- L-005-029 | 23. p. 5-26: How would westbound bus riders cross Montlake Boulevard to transfer to southbound local bus service? A map or diagram is needed to clarify the description of these circulation patterns.
- L-005-030 | 24. p. 5-27: *Bikes and Transit* section – The document does not mention the permanent removal of existing bicycle parking facilities (bike racks and lockers) at the Montlake/SR 520 intersection.
25. p. 5-28: Discussion of the Montlake Multimodal Station should include a specific reference to bicycle parking. We suggest that accommodations to replace the 54 bike locker spaces and 53 bike rack spaces that will be lost at the Montlake Freeway stop be made at the Montlake Triangle. King County also urges WSDOT to work with University of Washington and Sound Transit to coordinate a full-service bike station facility at or near the Montlake Triangle (although this could also be located at or in the vicinity of University of Washington Link Light Rail Station). This has been proposed by UW staff and by members of Sound Transit's Bicycle Advisory Group. The existing Montlake Freeway Stop bike parking area was initially expected to be a bike station, but lack of resources and WSDOT regulations on that property eliminated that concept from consideration.
- L-005-031 | 26. p. 5-28: An appropriately-scaled map or diagram is needed to illustrate bike connections between the SR 520 trail and the Montlake Triangle.
- L-005-032 | 27. p. 5-30: *Effects of Suboptions:* The first bullet should clarify that the traffic volumes applies to the Arboretum and provide more explanation of this issue. This is a significant issue considering the controversy surrounding the Lake Washington Boulevard ramps. (At the February 23 SDEIS hearing, citizens who voiced opposition to

these ramps had also voiced support for transit. If citizens understood the benefit that these ramps would have on transit, there might be more acceptances of these ramps.

28. p. 5-31: The FSEIS should evaluate a comprehensive traffic management plan comprised of potential strategies intended to reduce arboretum traffic without significantly affecting transit performance, especially during peak ridership times. Examples of such strategies that have been suggested include closure of the Lake Washington Boulevard ramps during certain time periods, limiting their use to peak commute hours, or limiting their use to High Occupancy Vehicles; traffic calming; police emphasis patrols; and transportation demand management strategies including tolling, minimum vehicle occupancy requirements at certain times of day, and street closures for special events. The FSEIS, should also evaluate the relative impacts and benefits of alternatives to the Lake Washington Boulevard ramps that enhance transit such as additional transit priority treatments on Montlake Boulevard. The FSEIS needs to clarify the performance of such approaches relative to community concerns and project goals.

29. p. 5-32: *Transit:* King County Metro will continue to work with WSDOT to identify appropriate measures to mitigate impacts to transit facilities and service.

30. p. 5-153: A map or diagram similar to Exhibit 2-22 but in a legible scale is needed to illustrate how and where the 6-lane section tapers into the 4-lane section of the SR 520 mainline as well as show how the regional bicycle/pedestrian path on the new pontoons would connect to comparable facilities on the west side of the lake.

31. p. 5-154: The analysis of the Phased Implementation Scenario needs to address impacts to cross-lake pedestrian and bicycle travel.

32. p. 5-155 Traffic performance under the Phased Implementation Scenario should be illustrated by diagrams like Exhibits 5.1-7 and 5.1-9.

33. p. 5-155 Does the "Persons per Hour" in Table 5.15-3 include transit passengers?

34. p. 5-158: Discussion of Phased Implementation states that traffic operations would be similar to the No Build Alternative. Under this scenario, the need for aggressive and effective TDM to manage demand may be more severe, as travel times for both transit and general purpose travel would be negatively affected. The Final SEIS should address additional TDM mitigation for long term operations if Phased Implementation is pursued.

35. p. 5-167: Table 5.16-1 *Summary Comparison of Operation Effects of the 6-Lane Alternative Options / Montlake Freeway Station:* This description of the impact of the loss of the station should address that the function of the station will be replaced by an eastside transit station at Evergreen Point, designed to accommodate increased passenger transfer activity. Additionally, the description should note that replacement of the function of the station also requires additional transit service, estimated at \$3-5 million annually, to provide more direct service between UW and Eastside communities.

- L-005-039 | 36. p. 6-10: *Montlake Freeway Station*: Further clarity on rider connections once the Montlake Freeway Station is removed. Sound Transit UW Link is not scheduled for operation until 2016. In the interim, riders who currently use the Montlake Freeway Transit Station to access buses to downtown Seattle will either be using local buses on Montlake Blvd. to reach downtown via Capitol Hill or they will need to access downtown-bound buses at Campus Parkway by either walking or transferring from local service on Montlake Boulevard.
- L-005-040 | 37. p. 6-11: As Metro has shared in previous comments on the SDEIS and several discipline reports; Metro is not considering operation of a shuttle service between Evergreen Point Freeway station and the transit stop at 92nd Ave NE. Metro is open to further discussion with WSDOT and Sound Transit of possible measures to mitigate the impacts to riders when only one eastside transit station is necessary.
- L-005-041 | 38. p. 6-11: Mitigations for the impacts summarized under each subheading need to be addressed under *How can the project minimize negative effects on transportation during construction?* Beginning on page 6-15.
- L-005-042 | 39. p. 6-15 (see page 5-32/ transit subsection also): Discussion of potential methods to minimize negative effects on transportation should also include further discussion on mitigation funding by WSDOT to offset the impacts anticipated to transit operations and facilities. Metro and Sound Transit will continue to work diligently with WSDOT to identify construction impacts and provide cost estimates related to the impacts on transit operations and facilities and WSDOT needs to commit the necessary funds.
- L-005-043 | 40. p. 6-15: Impacts to transit facilities, including temporary and permanent bus stop closures, temporary loss of transit priority lanes, and impacts to existing transit layover and electric trolley bus overhead wire, are adequately described earlier in this chapter. However, more specificity is desirable in the discussion of TMP measures dealing with the approach to working with affected agencies in mitigating these impacts, i.e. *“Measures to minimize effects on transit operations and access to/from transit facilities (in coordination with transit service providers)”* seems insufficient.
- L-005-044 | 41. p. 6-15: The description of the Traffic Management Plan (TMP) references a “Public outreach communication plan”. This should include not only information regarding construction status and daily impacts, but should include information on transit service options and other TDM programs that are available. This campaign should be coordinated with affected jurisdictions, major employers, and employer networks.
- L-005-045 | 42. p. 6-17: *Special Events*: Further clarification is needed regarding shuttle services and discounts for the transit shuttle. Are transit agencies expected to provide these services?
- L-005-046 | 43. p. 6-17: We are pleased that the SDEIS includes a discussion of TDM activities, and agree that it can be effective to support existing TDM programs implemented by affected jurisdictions. However, local jurisdiction funding for these activities is largely

L-005-046 | grant-funded and there is no assurance regarding the level these programs will be funded at the time of SR 520 construction activities. The Final SEIS should address funding support for ensuring the continuation/expansion of TDM information and incentive programs to effectively manage travel demand in the SR 520 corridor. In addition, the document should reference the existing commute management programs at major institutions, such as University of Washington, Children's Hospital, and Microsoft, in addition to those of local jurisdictions, as other programs that the project should coordinate with to maximum TDM effectiveness during construction. The Final SEIS should also assess the need for additional transit services as mitigation, and address cost and funding to support these services.

L-005-047 | 44. p. 6-18: The Final SEIS should discuss need for coordination with King County Metro, Sound Transit, the City of Seattle and the University of Washington to locate temporary bicycle parking when the Montlake freeway stop is closed. Until the cross-lake bike lane is open, the demand for bike parking is likely to remain at current levels. Plans for outreach need to include bicycle commuters that will be affected by construction activities. Specific route planning, bike parking or other assistance may also be required.

L-005-048 | 45. p. 6-113: Table 6.16-1 *Summary Comparison of Construction Effects of 6-Lane Alternative Options/ Transit Element*: This section should include additional information on the impacts of transit operations that are described in pages 6-10 to 6-11. In particular, a brief discussion of the impacts to the Montlake Triangle and electric trolley bus impacts should be included in this table.

L-005-049 | p. 7-17: The Indirect and Cumulative Effects chapter should also include discussion on the impacts of construction on transit operations. The section touches on temporary changes to transit facilities, but does not discuss these expected effects further and does not discuss potential need for transit reroutes due to lane closures, road detours, etc.



**Memorandum**

**Date:** March 22, 2010  
**To:** Stephanie Brown, SR-520 Project Manager, SDOT  
**From:** Nancy Ahern, Deputy Director, Utility Systems Management Branch  
**Re:** SR-520 Interests and Concerns 

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Per your request, the purpose of this memo is to summarize at a high level SPU's interests and concerns with the proposed SR-520 project, so that a joint City position can be developed. Our interests and concerns fall into two broad categories, as described below.

**Protection or Replacement of Existing Pipelines**

SPU owns several water and wastewater pipelines that cross SR-520, including:

- **The Maple Leaf Pipeline** – a 54-inch water transmission pipeline that crosses under SR-520 about 100 feet east of the existing Montlake Bridge and was relocated and replaced in the early 1960s to accommodate SR-520. Up to 750 feet of this pipeline will need to be lowered if SR-520 is expanded.
- **The 430 Pipeline** – a 42-inch water transmission pipeline that crosses under SR-520 between the 10<sup>th</sup> Ave E and Delmar Ave E overpasses and was relocated and replaced in the early 1960s to accommodate SR-520. Up to 500 feet of this pipeline may need to be lowered or relocated if SR-520 is expanded.
- **The Boylston Avenue Feeder** – a 20-inch pipeline that is located in Boylston Ave E west of I-5 in the I-5 – SR520 interchange area and pre-dates the freeways. Approximately 800 feet of this feeder may need to be relocated due to potential conflict with the new interchange lid.
- **The Roanoke Street Feeder** – a 12-inch pipeline located in E Roanoke Street, extending from the Boylston Ave Feeder (located west of I-5, see above) to 11<sup>th</sup> Ave E. Up to 1,200 feet of this feeder may need to be relocated due to potential conflict with the new interchange lid.
- **The Boyer Avenue Feeder** – a 20-inch water main that crosses under SR-520 at Boyer Avenue underpass, pre-dates SR-520, and will need to be protected in place if SR-520 is expanded.
- **The Montlake Boulevard Feeder** – a 12-inch water main that crosses SR520 in the Montlake overpass and supplies the area between SR-520 and the Ship Canal. Up to 1,100 feet of this main may need to be replaced if SR-520 is expanded. Distribution mains in E Shelby and E Hamlin Streets crossing Montlake Boulevard may also be impacted.

L-006-001

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- **A 24-inch combined sewer** that carries flows under SR-520 in the vicinity of the Museum of History and Industry to a pump station for conveyance out of the Montlake area. This pipeline was installed in 1961 and may need to be lowered or relocated if SR-520 is lowered or expanded.
- **An 8-inch combined sewer** that carries flows under SR-520 in the vicinity of the Seattle Yacht Club to another pump station for conveyance out of the Montlake area. This pipeline may be impacted by the SR-520 project if supports for the new freeway need to be placed on or near the pipeline.
- **A 24-inch combined sewer** that carries flows under I-5, north of the I-5/SR-520 interchange near Boylston Avenue. The portion of the pipeline under I-5 was constructed in 1959, while the small portion in the City roadway was constructed in 1906. This pipeline may be affected by the treatment facilities for managing stormwater from the proposed interchange lid.

These SPU utilities across and along the SR-520 and I-5 corridors pre-date the freeways. SPU research of real property records for the Montlake area (where the 54-inch water pipeline and one of the 24-inch combined sewers cross SR-520) has so far shown that SPU has sufficient property rights to require WSDOT to bear the cost of any relocations that may be necessary in this area.

The other areas of possible impacts are in the process of being researched. Interactions with WSDOT on the Boylston Sound Walls project a few years ago, where the proposed WSDOT sound walls along I-5 were initially impacting the same Boylston Feeder that may now be impacted by the SR-520 project, have shown some real property peculiarities that were not fully resolved at the time. This issue is likely to come up in the SR-520 project.

Given that the SPU utilities existed before the freeways were built – in City streets or on other City-owned land or within easement on private property - SPU requests that the City take the position that **WSDOT should bear the cost of any water or wastewater pipeline relocations that are necessary.**

The estimated cost range of these impacts is up to \$5-7M.

### **Protection or Enhancement of Water Resources and Water Quality**

SPU requests that the City express the following interests in the area of water resources and water quality:

1. The City expects that the SR-520 project will have no impact on the routing or the amounts of stormwater between the City's combined and separated drainage systems, unless it is possible to reduce the amount of flow to the City's combined system through on-site infiltration of stormwater;
2. The City expects that WSDOT will be responsible for constructing, operating and maintaining any water quality or flow control facilities associated with the stormwater treatment requirements of the SR-520 project;

L-006-002

L-006-003

- L-006-004 | 3. The City expects that the stormwater treatment for any SR-520 runoff entering the City's separated or combined drainage systems will meet the City's 2009 stormwater code requirements for water quality and flow;
- L-006-005 | 4. Protecting the water quality of Lake Washington is a shared concern of many jurisdictions, including Seattle. Stormwater runoff from roadways is a major source of pollutants entering receiving water bodies, and the City supports the proposed use of street sweeping, if done frequently and with high efficiency sweepers, as an appropriate method for decreasing pollutants discharged to Lake Washington from the SR-520 bridge deck;
- L-006-006 | 5. The City is interested in working with WSDOT on site selection and design of aquatic and wetland mitigation associated with the project; and
- L-006-007 | 6. The SR-520 project should be designed and constructed in a manner that avoids, minimizes or mitigates impacts to salmonids. Among the more important considerations include shielding the water surface from artificial lighting on overwater structures, avoiding impacts to adult migration through the SR-520 project area and minimizing the number and/or size of pilings.

Thank you for requesting SPU's input. Please call Betty Meyer at 206/386-1999 if you have any questions about the interests and concerns in this memo or need additional information.

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