

-----Original Message-----

From: T. Gould [mailto:4cleanair@usa.net]

Sent: Friday, April 16, 2010 3:32 AM

To: SR 520 Bridge SDEIS

Subject: Sierra Club comments-- 520 Replacement SDEIS

Hello,

Please find attached a comment letter on the SR 520 supplemental draft EIS.
Thank you.

Tim Gould

Volunteer Chair, Transportation & Land Use Committee Sierra Club Cascade
Chapter

(206) 675-0691

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Cascade Chapter

180 Nickerson St, Ste 202

Seattle, WA 98109

Phone: (206) 378-0114

Fax: (206) 378-0034

www.cascade.sierraclub.org

15 April 2010

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

Comments on SR 520, I-5 to Medina: Bridge Replacement and HOV Project Supplemental Draft EIS

Dear Ms. Young:

c-038-001 | We appreciate this opportunity to comment on the Supplemental Draft Environmental Impact Statement for the SR 520 Bridge Replacement and HOV Project. Sierra Club urges the development of transportation options that support state, county and city greenhouse gas (GHG) emission reduction goals. We favor GHG assessments that evaluate, rank, and select project elements and design configurations, rather than simply identify mitigation measures for a business-as-usual approach. These assessments should be based on GHG emissions from construction as well as from operation of the various travel modes through the SR 520 corridor over the life of the facility. Since high capacity transit (HCT) promotes compact, walkable residential and commercial areas around transit stations thereby reducing associated GHG emissions, design of the SR 520 bridge and its interchanges should optimize the role of transit.

Objectives for SR 520 Project

c-038-002 | The Washington State Department of Transportation (WSDOT) and its partner agencies should pursue the following objectives with any eventual design selected for the SR 520 bridge replacement project:

1. emphasize the movement of people and goods rather than vehicles;
2. mitigate climate change impacts through reducing GHG emissions;
3. prioritize transit use including provision for light rail transit;
4. restore and protect the Arboretum and its wetlands, and Lake Washington;
5. improve air quality and reduce traffic noise, for human and environmental health;
6. promote thriving communities while reducing sprawl.

While the SR 520 bridge is a regional facility, it connects intimately with the communities and streetscape of the corridor through which it passes. In addition to regional mobility, the project must place an emphasis on walking, biking, and transit use in the surrounding

C-038-002 | corridor. The selected design should enhance livable neighborhoods and provide opportunities for transit-oriented development (TOD) to reduce sprawl. Instead of a focus on congestion mitigation, the project should expand mobility options, including transit improvement projects that minimize greenhouse gas emissions.

C-038-003 | **Legislature prematurely narrows options before environmental analysis**

Under both the National Environmental Policy Act and Washington's State Environmental Policy Act, WSDOT should analyze a set of reasonable alternatives—those considered to “feasibly attain or approximate a proposal’s objectives”. Sierra Club strongly believes this obligation of the lead agency WSDOT has been impeded through a narrowly defined set of options. The Legislature through passage of ESSB 6099 in 2007 artificially constrained the set of design alternatives. It continued the narrow focus of design alternatives with passage of ESHB 3096 in 2008.

Many of the design flaws in option “A+” that we identify below are the result of the Legislature’s prescription for a six-lane facility. Yet the guidance given by the Legislature does not preempt the obligation of WSDOT to analyze and select a preferred alternative consistent with NEPA and SEPA processes.

Alternatives studied in the EIS do not recognize fiscal reality, the public’s desire for a range of project scales with corresponding impacts, nor recent design modifications urged by the City of Seattle for the west side landing of the bridge and interchange. Furthermore, the EIS does not recognize that forecasts for growth extrapolated from recent decades will almost certainly be wrong due to the imminent decline of world oil production. The resulting end of cheap energy upon which our present transportation system is based will necessitate new approaches. Designs need to be evaluated relative to alternative scenarios for economic and traffic growth.

In short, the EIS process is broken. WSDOT cannot be expected to make an informed decision when its evaluations do not include a reasonable set of alternatives.

C-038-004 | **Fixation on reducing congestion ignores urban form and reduction of sprawl.**

The design and function of the SR 520 replacement project will greatly influence future development in the region. A critical choice facing residents, commuters, and officials on the westside is whether to accommodate more vehicles entering Seattle or provide good options to encourage more transit usage. The solution that builds better urban form and reduces the incidence of sprawl is to better move people efficiently and conveniently through the corridor without adding to vehicle miles traveled, GHG emissions, and expanding infrastructure for vehicles.

Congestion is primarily a pricing problem best solved with tolling. We know from past experience and elsewhere that additional capacity produces latent demand for highway space and the new lane miles fill up producing more congestion. Instead, the focus must shift to emphasize the quality of the urban spaces. These guidelines are part of the alternative to congestion relief:

C-038-004

- (1) Implement a mobility solution that improves air quality and reduces traffic noise, for human and environmental health
- (2) Integration of transit-oriented development (TOD) into this major transit project
- (3) Spend limited resources in most environmentally effective, least damaging manner.

C-038-005

No build alternative neglects use of tolling

Traffic demand management through tolling of the existing bridge is not included as part of the baseline scenario in the no build alternative. Yet the existing bridge will have tolls implemented by Spring 2011 through the Lake Washington Congestion Management Project. Variable toll rates set according to peak demand will invariably lead to improved traffic flow. Comparison of the no build alternative with assorted 6-lane alternatives does not consider the benefits from demand management.

WSDOT must incorporate predicted changes to commuter behavior resulting from tolling and construction closures in all corridor use projections and design work on reasonable alternatives. When models for traffic projection are not adequately sensitive to driver response to tolling, the result is an inaccurate characterization of traffic demand. The selection of alternatives evaluated in the EIS suffers from the inaccurate “need” for mobility.

More ambitious implementation of tolling needed

Sierra Club supports implementation of tolls on the SR 520 bridge as soon as is practical. The lack of real world data from tolling of SR 520 has contributed to unrealistic travel projections and the resulting deficient alternatives in this EIS. As noted in a December 2009 letter to the 520 Legislative Workgroup, we also support full general tolling of I-90 as soon as is practicable. The likelihood of traffic diversion from SR 520 to an I-90 corridor with only HOT lane tolling is too great to delay the inevitable tolling of both Lake Washington bridges. The current and past State Treasurer have recommended tolling of both Lake Washington bridges to create an acceptable finance plan.

Equity is a very important consideration when setting tolling policy. We strongly support the use of congestion management toll revenue for transit operations and maintenance. By providing better transit options, those travelers who might otherwise find tolls to present a hardship will have suitable alternatives for travel in the 520 corridor. Design and later installation of light rail transit should be considered a legitimate use for the congestion mitigation component of toll revenue.

Toll revenue from SR 520 must support transit operations in this same corridor. Good transit alternatives along with emphasizing privacy protection in all toll collection systems and technology will build public trust and support.

C-038-006

Minimize impacts on Arboretum

The rebuilding of the westside of SR 520 offers a generational opportunity to right a wrong of the previous generation, attaching a state highway access road to this regional jewel of the park system. A part of the 1903 Olmsted Plan for Seattle's boulevard system, Lake Washington Boulevard was never intended to carry the traffic volumes associated with

C-038-006 | direct-access ramps to and from SR 520. The EIS 4(f) evaluation fails to identify Lake Washington Boulevard as either a historic resource or a park and recreation resource. WSDOT must recognize its designation as an official Park Boulevard in all subsequent design work.

Sierra Club supports the Arboretum Foundation guiding principles for the SR 520 expansion, such as the priorities calling for adding no ramps to the Arboretum and discouraging commuter traffic through the Arboretum. We urge the following elements be incorporated into a selected alternative for this project:

- (1) No ramps to/from Lake Washington Blvd. E. since they funnel excessive traffic into and through the Arboretum;
- (2) Reduce in-water impacts of structures through Arboretum, Foster Island, and other wetlands;
- (3) Manage storm water runoff, including requiring any holding ponds to be earthquake proof, ensuring long term protection of Lake water quality;
- (4) Design a consolidated, lowest impact overall project footprint.

C-038-007 | **Context-sensitive design standards should prevail**

Rather than typical design standards more appropriate for interstate highways in rural areas, the SR 520 project should employ context-sensitive design standards. The following features should be integrated into all aspects of the SR 520 design. Its westside landing in the midst of a built-up urban area is in particular need of these treatments:

- (1) Narrowed lane and shoulder widths to lower vehicular speed; reduce noise and air pollution; increase fuel efficiency; and save lives;
- (2) Lower posted speed limit and design speed; maximum vehicle throughput is achieved at approximately 45 mph, not 60 to 65 mph;
- (3) Bridge design employing wave attenuation features to minimize water splash and allow for reduced bridge height, and bridge form determined by rigorous acoustics evaluation, and visual aesthetics;
- (4) Avoid wider, taller, more massive project configurations since they increase greenhouse gas emissions during construction and through embodied energy.
- (5) Calming of traffic through use of all signalized ramps, and priority intersection movements for transit.

C-038-008 | **Retain transit flyer stops along SR 520 at Montlake Blvd.**

The interchange design ought to include retention of the Montlake transit “flyer” stops, as they provide convenient access to downtown Seattle oriented bus routes for riders with other destinations or points of origin. Passengers going to and from the south of Montlake, for example North Capitol Hill, and those going to and from the University District and points further north all benefit from the better transit connectivity. A crucial feature to incorporate in the interchange layout and operation consists of:

- Safe local bike, walk, and transit connections to and from regional transit service

C-038-008

We are concerned the proposed added subsidy for separate bus service across the replacement SR 520 bridge for downtown and U District markets is problematic. The plan proposed by Metro Transit and Sound Transit to increase cross-Lake bus service to separately serve the University District and Downtown Seattle markets can be effective during peak periods. But we are concerned that this duplication of bus routing across the bridge may not be the best allocation of resources in off-peak times, and may prove to be fiscally unsustainable given the recent experience with transit funding shortfalls and tepid state leadership to champion this funding.

A configuration that would allow this transit stop to be retained as part of the interchange without necessitating further width could include some of these elements:

- (1) the two inside lanes of SR 520 are transit only at Montlake Blvd. interchange, rising to a signalized intersection with Montlake Boulevard E.;
- (2) transit flyer stops at same level as Montlake Blvd. for ease of connection with local transit service, with no elevators, escalators, or stairs;
- (3) stacked flyer stops for reduced footprint with eastbound stop at level of Montlake Blvd. to comingle bus routes originating from Downtown Seattle and the U District, while westbound stop at level of SR 520 serving routes bound for Downtown Seattle;
- (4) transit lane and exit or on-ramp lane placed together on one ramp structure connecting from SR 520 to stoplight intersection at Montlake Blvd.

C-038-009

Smaller footprint options need adequate evaluation and consideration

The implication of the State curtailing the set of evaluated options is that no refined, transit-optimized 4-lane option has been considered in this supplemental EIS. While a 4-lane option was included in the original 2006 draft EIS, substantial refinement has occurred to the various 6-lane options since publication of the Project Draft EIS. No such refinement has occurred with a 4-lane option, casting some doubt on the finding that it was inadequate to carry forward into this Supplemental EIS.

Funding for this project is still inadequate compared with the identified alternatives. One reason for inclusion of a refined 4-lane option is it may prove to be the only alternative that is financially and environmentally affordable. The restriction of evaluated alternatives to only 6-lane configurations does not allow the environmental review to determine the final configuration as intended under NEPA and SEPA. Other alternatives for design and use of the project right-of-way that should be evaluated include:

- (1) Hybrid with four lanes between Montlake Blvd. and I-5, and six lanes between SR-202 and Montlake Blvd.
- (2) Additional two lanes where included in highway footprint dedicated for transit use;
- (3) Width of lanes and shoulders reduced from FHWA standards

This project is complicated owing to its location in a built-up urban area with sensitive wetlands. We owe ourselves and future generations a comprehensive evaluation of reasonable alternatives.

C-038-010

Design and construct the bridge to accommodate light rail transit

Sierra Club advocates for a replacement SR 520 bridge and corridor that prioritizes transit use. A project of this magnitude with its long-term implications for regional travel and growth patterns needs to be equipped with high-capacity transit to serve the region in an era of rising energy costs. Building a long-term facility that is not capable of accepting light rail in the future would be extremely short sighted.

The addition of light rail transit (LRT) to a new SR 520 bridge can provide a key segment in a more developed network of high capacity transit for our region. An alignment using the SR 520 corridor can directly connect Kirkland, Bellevue, or Overlake with the University of Washington and eventually extend west as a Seattle cross-town route through to Ballard. The recent work by City of Seattle transportation consultant Nelson\Nygaard illustrates the challenges of making this project capable of including LRT in its configuration. Sierra Club supports the following features to assist inclusion of LRT in the 520 project:

- (1) dedicated high-capacity transit lanes capable of carrying light rail trains connecting major urban centers;
- (2) construct bridge from outset to accommodate weight of light rail trains without costly retrofit in the future;
- (3) phased approach with bus rapid transit (BRT) when new structure opens convertible to light rail when plan and finances are identified and ready;
- (4) separate the east- and west-bound lanes of SR 520 near Foster Island for light rail alignment to drop below or rise above highway and diverge to connect with UW light rail station;
- (5) minimize overall width especially by speed reduction in design standards to reduce need for wider bridge corridor to serve light rail needs. Keep bike / pedestrian path consistent with City of Seattle standards.

Sierra Club supports this EIS process examining the inclusion of LRT as part of the eventual configuration for SR 520. Even if an additional Supplemental EIS is needed, we cannot afford to preclude the addition of light rail simply to hold the project timeline to a somewhat arbitrary alternative selection schedule. The quality of the final outcome matters more than the amount of sunk cost and time already expended on this project. We face key challenges from climate change and rising energy costs; hence the imperative to “get this right” now before moving forward.

C-038-011

Sierra Club is committed to a future of smarter energy and transportation choices. The choices we make today will determine whether or not the region can navigate a path toward sustainability tomorrow. When investing in transportation infrastructure for half or three-quarters of a century, the region needs to take into account the imperative to reduce GHG emissions and to provide high quality transit in this corridor. The public will be best served when our resources are spent in the most environmentally effective, least damaging manner. Consistent with these values and objectives, Sierra Club urges WSDOT to revise the SR 520 project by:

C-038-011

- * eliminating ramps to/from Lake Washington Blvd. E.;
- * retaining the transit flyer stops along SR 520 at Montlake Blvd.;
- * incorporating the response to tolling more accurately into traffic projections and resulting capacity assumptions and designs;
- * adopting minimal impact design standards;
- * designating any additional two lanes as transit only; and
- * designing the bridge corridor to accommodate light rail transit within never more than a 6-lane footprint.

We appreciate the opportunity to discuss our perspectives regarding this important transportation investment.

Sincerely,

Morgan Ahouse
Chair, Sierra Club Cascade Chapter

cc: Mayor Mike McGinn, City of Seattle
Seattle City Council

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

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

Thank you,
Bill

Bill LaBorde
Policy Director
Transportation Choices Coalition
811 1st Avenue, Suite 626
Seattle, WA 98104
Cell: 206.484.8662
<http://www.transportationchoices.org>
<http://transportationchoicescoalition.blogspot.com/>
Facebook: <http://www.facebook.com/pages/Transportation-Choices-Coalition/47469157422?ref=ts>

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811 First Avenue
Ste 626 • Seattle, WA 98104
Office: 206.329.2336
Cell: 206.484.8662
bill@transportationchoices.org
www.transportationchoices.org

Attention: SR520 Bridge SDEIS Comments
Jennifer Young
Environmental Manager
SR 520 Program Office
600 Stewart St., Suite 520
Seattle, WA 98101

VIA E-MAIL

April 15, 2010

Dear Ms. Young:

c-039-001 | Thank you for the opportunity to comment on the Supplemental Environmental Impact Statement for the SR 520, I-5 to Medina Bridge Replacement project. Transportation Choices Coalition has a long history with this project, serving on the Trans-Lake Corridor Study Committee in the late 90s on through to the Mediation process in 2008. Throughout the development of SR 520 plans, we have consistently focused on the need for variable tolling to manage congestion on the corridor as well as fund much of the project itself; a robust transit mitigation plan for the construction phase followed by a *funded* transit plan for the corridor once the bridge becomes operational; and safe and sufficient bicycle and pedestrian access across the bridge and North/South through the Montlake interchange area. We also have consistently advocated for flexible use of tolling revenue to fund transit and other alternatives to driving across the bridge. These are the issues on which we will focus our comments on the SDEIS.

Design Alternatives

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

Adaptability to Light Rail

c-039-002 | The biggest design question that remains is how we will accommodate the region's inevitable desire to extend light rail across the 520 corridor at some point in the future. While we strongly support the regional consensus we are now proceeding on to build light rail across I-90 first, we know that metropolitan areas with mature, fully developed rail transit systems don't just have one line or two lines. Portland MAX, which started operations 24 years ago, now operates four lines. The 16 year

C-039-002

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

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

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

C-039-003

HOV Capacity and Transit Operations

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

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

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

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

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

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

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

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

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

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

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

c-039-012

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

Sincerely,

A handwritten signature in black ink, appearing to read "Bill LaBorde". The signature is stylized and cursive.

Bill LaBorde
Policy Director
Transportation Choices Coalition

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HOV Capacity and Transit Operations

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

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

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

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

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

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

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

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

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

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

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

c-039-012

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

Sincerely,

A handwritten signature in black ink, appearing to read "Bill LaBorde". The signature is stylized and cursive.

Bill LaBorde
Policy Director
Transportation Choices Coalition