Puget Sound Clean Air Agency
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October 31, 2006

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WSDOT

Paul W. Krueger
Project Environmental Manager
WSDOT Urban Corridors Office
414 Olive Way, Suite 400
Seattle, WA 98101-1209

Dear Mr. Krueger:

SR 520 Bridge Replacement and HOV Project
Draft Environmental Impact Statement

Thank you for the opportunity to comment on the environmental analysis for the SR 520 Bridge Replacement and HOV project DEIS. The DEIS provides a clear presentation of air quality issues, however the focus and analysis needs to be improved in order to assist decision makers in selecting the best alternative, protecting public health, improving air quality, and protecting global climate. We also have a number of recommendations for the preferred alternative.

The DEIS could be improved by addressing the following:

- Shift the focus from carbon monoxide (CO), which is a pollutant of declining concern, to toxic air pollutants and greenhouse gases, which are of increasing concern locally and globally.
- Provide additional discussion of the impact on greenhouse gases and mitigation measures for protecting global climate.
- Clarify that CO and carbon dioxide (CO_2) are different emissions with different characteristics and impacts, requiring different mitigation. For example, CO is primarily a wintertime problem, while CO_2 is a problem year-round. The current discussion of the similarity of CO and CO_2 vehicle emission rates could create a misimpression that technology can significantly reduce CO_2 emissions as it has reduced CO emissions. Through technology, overall CO emissions have been reduced even while vehicle-miles-traveled has increased. There is no comparable history of reduction in emissions for CO_2 and no currently available technology able to reduce CO_2 emissions from internal combustion powered vehicles.
- Provide additional discussion of the impact and mitigation of toxic air pollutants. While there are no national ambient air quality standards for air toxics and the subset of mobile source air toxics (MSATs), they pose a public health risk. Many are known carcinogens, and both monitoring and modeling have shown them at levels that present health risk in our area. Currently available technology to reduce these emissions should be considered. Additionally, the proposed cut-off of 10 tons of a single air toxic (25 tons combined), equivalent to EPA's definition of a major source, does not seem sufficient to designate "low" and "high" risk MSATs. To do so would underestimate potential health risks from sources consistent with EPA's definition of area sources. Attachment B of our April 6, 2005 letter contains a number of sources that could assist in the rewriting of this discussion.

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R-001-005
- Fully respond to the issues raised in Attachment A of our letter of April 6, 2005 commenting on this project.

R-001-006
- Provide additional discussion of the air quality impacts of closing the westbound HOV lane for 2 years during construction, and on air quality during the construction period and in the post construction period.

R-001-007
- What happens to transit ridership and single-occupancy vehicle use and the associated emissions if additional transit service is not provided?

R-001-008
We recommend that the selected alternative and the Record of Decision (ROD) include the following measures to mitigate potential impacts to public health, air quality, and global climate:

(1) Secure the commitment to provide increased transit service by the time of the ROD.

(2) Mitigate construction period emissions by giving priority during the bidding process to construction companies that will use retrofitted diesel equipment on the project and by retrofitting diesel-powered equipment that is used on the project.

(3) Provide HOV lanes in both directions throughout the construction period.

(4) Design and construct all HOV, transit, light rail, pedestrian, bicycle, and park & ride facilities, and their connections, not only to increase their use, but to ensure no break in service, no diminution in service, and no increase in travel time. For example transit stops and terminals should be adjacent to light rail stations and the pedestrian connections between them should be protected from adverse weather conditions.

If you have any questions or need further information, please contact Paul Carr of our staff at (206) 689-4085 or e-mail to paulc@pscleanair.org.

Sincerely,

David P. Kircher

David S. Kircher
Manager, Air Resources Department

DSK/lh

Puget Sound Regional Council
PSRC

October 26, 2006

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WSDOT

Paul Krueger
Environmental Manager
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, Washington 98101

RE: SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement

Dear Mr. Krueger:

The Puget Sound Regional Council appreciates the opportunity to comment on the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement (DEIS). The project represents a significant and crucial next step toward implementing the region's long-range growth management, economic and transportation strategy, *Vision 2020* as well as the Metropolitan Transportation Plan, *Destination 2030*.

Destination 2030 specifically calls for safety, maintenance and capacity improvements in several regionally significant travel markets including the SR 520 corridor. Given the potential failures of Portage Bay and Evergreen Point bridges a prudent and timely decision on this transportation investment is important. From a congestion standpoint the SR 520 Bridge is among the ten worst bottlenecks in the Puget Sound region.

The first portion of this letter provides comments on the DEIS. The comments address regionally significant land use and transportation issues. For your information, the second portion of the letter summarizes the process and steps to be taken to advance the SR 520 Bridge Replacement and HOV Project from a Candidate project to an Approved project in *Destination 2030*. This is a necessary step before purchasing right-of-way and initiating the construction of facilities.

PART 1: Comments on DEIS

Cost and Revenue Assumptions

R-002-001

It is our understanding that the cost assumptions and revenue projections have been reevaluated in response to the recent Report[1] of the Expert Review Panel. The PSRC also encourages a thorough examination of the costs and financing related to the operations and maintenance during the construction phase and at final build-out.

[1] The Alaskan Way Viaduct and SR 520 Bridge Projects Report of the Expert Review Panel Revision 1, September 1, 2006 (p. 21-16).

R-002-002 It may be necessary to provide readers a more detailed understanding of the toll rate/policy and toll modeling assumptions that contribute to both the SR 520 Bridge operating conditions and toll revenue opportunities. Specific toll modeling assumptions will re-state toll policy, which may accommodate flexibility to respond to actual, and changing, economic and demand conditions on the facility over time.

The DEIS also states that the determination of a toll policy considered the tradeoff between revenue and diverted traffic. What is not clear from the DEIS, is whether the toll policy fully examined the opportunities provided by optimizing tolls across all SR 520 Bridge traffic lanes. In particular, it is our understanding that the DEIS is exploring concepts of time of day dependant tolling which could provide users a greater degree of certainty of speed and reliability on the roadway. At the same time the DEIS continues to make commitments to the provision of HOV lanes. The DEIS should contain a discussion of the conditions and strong regional and state policy commitments under which dedicated HOV lanes continue to make sense in the face of the pricing potential to maintain performance for all bridge users. This may be helpful to explain and fully characterize the potential revenue "loss" associated with HOV lanes that may underutilize the toll paying carrying capacity of the bridge facility.

R-002-003 **Managing System Demand**

As briefly discussed on page 11-5 of Chapter 11 "Traffic and Parking Mitigation" (Appendix R), the DEIS includes an initial identification of mitigation activities including operational improvements, ITS and travel demand strategies. As this project is refined, the PSRC strongly encourages your efforts to understand the origin and destination patterns within the SR 520 corridor, assemble additional data and facilitate community involvement in support of operational/ITS and demand management strategies, similar to the successful efforts deployed for the I-405 construction mitigation. We further recommend that a strategy be developed to sustain corridor-level demand management after project completion. This should be done in close coordination with local jurisdictions, neighborhoods and employers. PSRC recalls an effort by WSDOT's TDM Center several years ago to pull together such a TDM strategy and it should be revisited as a potential starting point for this effort.

R-002-004 **Non-motorized Element**

Destination 2030 provides specific direction for development of a regional bicycle and pedestrian system, placing high priority on completing the system by filling gaps in the existing network and creating connections to regional growth centers. The Regional Council commends WSDOT for providing a new bicycle/pedestrian path along the SR 520 corridor that removes a barrier, offers travel options between regional growth centers, and increases safety for all users.

For the SR 520 bicycle/pedestrian path to be complete and part of a comprehensive network, the Regional Council recommends that WSDOT evaluate closing a "missing link" that will be created if this facility terminates at 96th Avenue NE in Bellevue. The bicycle/pedestrian path should be extended to the east side of I-405 to connect with the existing SR 520 Trail (a prior WSDOT/eastside cities project) running from 124th Avenue NE in Bellevue to West Lake Sammamish Parkway. This is a project listed in the Non-Motorized component of *Destination 2030*. Linking the bicycle/pedestrian path to this regionally significant trail provides connections between the Redmond and Seattle University Community regional growth centers and the Overlake manufacturing/industrial center that supports Microsoft.

R-002-005 The Regional Council also supports the development of a bicycle/pedestrian path from the Madison Park area in Seattle to SR 520 as detailed in Appendix W of the DEIS. This connection will create a much needed bicycle commute option from south Seattle through Madison Park to SR 520 and the University of Washington while improving safety and decreasing travel distances and time over current bicycle commute alternatives.

To emphasize the benefits of completing key sections of the trail system, closing other gaps in the network has resulted in increased use. Prior to 1993, the Burke Gilman and Sammamish River Trails were not connected and had a 3-mile gap between Bothell and Kenmore. Completing that missing link provided a continuous path from Gas Works Park in Seattle to Marymoor Park in Redmond resulting in a steep increase in use on both trails, with usage jumping by 65 percent while regional population grew only 10 percent. Survey data from 2005 shows that more than one-third of weekday users took the trails to commute to work. The Regional Council believes similar benefits could be achieved by linking the new bicycle/pedestrian path to the SR 520 Trail.

R-002-006 **Air Quality**
It appears that tolling was assumed in the analysis of the 4-Lane and 6-Lane Alternatives, but no information is provided on the modeling details of this assumption and the corresponding effects on the analysis. Clarify tolling structure and assumptions used in the analysis. If other analyses (e.g., no tolls) were not conducted, please provide a justification for their absence. If the tolling assumptions are changed in the future, a new analysis should be performed. In addition, the Mobile6.2 input data should be referenced or provided in an attachment, to demonstrate that the appropriate settings were used.

R-002-007 **Transit Operations**
On page 4-11, related to bus transit, the DEIS states that transit service is assumed to increase under all alternatives, while recognizing that funds do not exist to pay for this increase. Analysis conducted for the no action alternative should not have included increases in transit service that is not currently funded. To be fully realistic, the analysis should also document the consequences of NOT obtaining additional transit funding for increased transit services and describe the resulting performance of the SR 520 facility if such service is not increased. In addition, the alternatives analysis should examine and suggest, in consultation with Metro and Sound Transit, potential funding sources that would support increased transit service.

R-002-008 **Indirect and Cumulative Impacts**
On page 25 of the Indirect and Cumulative Impacts section, the analysis cites an incorrect figure for the regional population and job forecasts for the year 2030. Rather than the 4.7 million people and 1.9 million jobs referred to in the text, the regional forecasts prepared in 2002, and used for the 2002/2003 small area forecasts, use year 2030 figures of 4.5 million people and 2.7 million jobs. It should be verified that the correct forecast numbers were used in the analysis within this section of the report. The forecasts prepared by PSRC can be found at: http://www.psrc.org/data/forecasts/index.htm.

R-002-009 **PART 2: Steps to be taken to advance SR 520 Bridge Replacement and HOV Project from a Candidate to an Approved project in Destination 2030.**

R-002-009

As noted on page 2-34, "Destination 2030 identifies widening SR 520 from the Evergreen Point Bridge to Redmond for HOV facilities as an Approved project and SR 202/ SR 520 interchange improvements as a Candidate project." The following information summarizes the necessary steps before purchasing right-of-way and initiating the construction of facilities.

- Background. In May 2001, the Puget Sound Regional Council adopted a new regional transportation plan – *Destination 2030*. This plan included guidance for capacity investments that categorized all regionally significant improvements as either Candidate or Approved (please refer to Guidance for Major Capacity Investments for a more detailed explanation of these distinctions). The SR 520 Bridge Replacement and HOV Project is included in the *Destination 2030* as a Candidate project. Candidate projects must satisfactorily address Approved project criteria before being designated as Approved in *Destination 2030*.

- Process. *Destination 2030* includes a policy that enables the Executive Board to authorize a change in status of regionally significant projects from Candidate to Approved. Listed below is a summary of the requirements identified in the "Guidance for Major Capacity Investments" for moving a project from Candidate to Approved status.

    1. Regional Council staff review and determine consistency of the project's final preferred alternative with Destination 2030 policies.
    2. Sponsor provides documentation for completed benefit cost analysis.
    3. Environmental documentation is completed and submitted with sufficient detail as to the final nature, character, components or design of the given project or program to determine regional policy consistency.
    4. Sponsor satisfactorily addresses any other planning requirements, which might have been specified by the Regional Council's Executive board for a given project.
    5. Sponsor submits financial plan demonstrating project feasibility by showing how the entire corridor project or its individual project components are to be funded.
    6. The project's final preferred alternative is reviewed for consistency with the current plan air quality conformity analysis; a new air quality plan conformity determination may be required.

When a Candidate project meets the above requirements, the project sponsor(s) may request the Regional Council to change the project and associated supporting projects to Approved status.

In conclusion, The Regional Council would like to again thank the study team for your commitment to this project and for the opportunity to "weigh in" with our comments. If you have any questions regarding our comments, please contact me at (206) 464-7134 or Robin Mayhew, Program Manager, at (206) 464-7537.

Sincerely,

Norman A. Abbott

Norman A. Abbott
SEPA Responsible Official

CC:
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King Cushman
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Joyce Olson
Chief Executive Officer

October 31, 2006

Mr. Paul Krueger
Environmental Manager
SR 520 Project Office
414 Olive Way, Suite 400
Seattle, WA 98101

Dear Mr. Krueger:

Thank you for this opportunity to comment on the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement (DEIS). Replacement is clearly warranted for this deteriorating facility to avoid a potential loss of life and economic disruption if the bridge sinks or is taken out of service. Further more, with this project, the opportunity is now there to maximize the person carrying capacity of SR-520 and the connecting corridors.

As this project goes forward, it will be important that the proposals designed to improve vehicle flow do not result in unintended restrictions on transit access or create other barriers to effective transit service. Community Transit agrees that early coordination should take place with the affected transit agencies, so meaningful adjustments can be made to the plan.

Community Transit offers the following comments:

R-003-001 **Community Transit supports the six lane alternative**. The DEIS (on page 1-5) states more directly that the project is needed because "SR 520 is congested and unreliable and does not encourage maximum transit and HOV use." HOV lanes are needed to meet the project needs as stated in the DEIS. HOV lanes should be a standard element on congested freeways and State arterials with significant transit volumes. A coordinated integrated approach with transit to combine various measures (including tolls, speed advantaged transit service, vanpools and other TDM measures) is needed to maximize the person-through-put on this and connecting corridors.

R-003-002 **A ramp connection from SR 520 to the I-5 Express Lanes would have a strong a benefit, but the impacts of reducing the lane capacity of the**

R-003-002

Express Lanes should be avoided. KC Metro, Sound Transit and Community Transit carry a large number of peak period transit trips on the I-5 Express Lanes. These trips would be adversely affected through delay caused by the loss of a lane due to a new ramp. The result would be a reduction in transit ridership and increased operating costs. Options to provide the ramp without reducing the existing Express Lanes capacity should be strongly considered.

The Montlake Flyer Stop provides a substantial transit benefit. Its elimination would adversely affect transit ridership on the corridor. The design of freeway stations is critical to preserve existing ridership and to facilitate the increased transit ridership assumed in the DEIS.

R-003-003

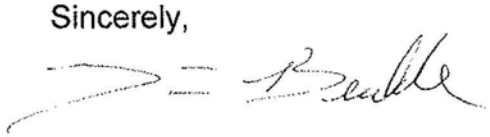
Construction Impacts. The proposed closing of the existing westbound HOV lane during construction should not be adopted. It is Community Transit's understanding that it is the Project's goal to mitigate some of the construction impacts by encouraging the use of transit and other HOV modes. The closure of the existing HOV facilities on this corridor sends the wrong message to the public and will further degrade transit travel time and result in increased operating costs that may result in a reduction of transit riders. Discussion regarding this proposal should take place with the Transit Agencies before the FEIS is issued.

R-003-004

Construction Mitigation. A collaborative process should be used to develop a program of construction mitigation measures, consistent with provisions of HB 2871. Community Transit recommends the development of a construction mitigation program that defines the mitigation program goals and then tailors the program to meet these goals. Based on the DEIS, transit is expected to provide a substantial portion of the person trips through this corridor after completion. The construction mitigation program is the best time to shift to transit by putting in place the key elements necessary for success. Consideration should be given to transit priority on the corridor and through the construction zones, the implementation of tolls and increased transit service levels.

Thank you again for this opportunity to comment on the SR 520 Bridge Replacement and HOV Project. If you have any questions feel free to contact me at 425 348-7149 or email me at tim.brakke@commtrans.org.

Sincerely,



Tim Brakke
Manager of Service & Facilities Development

Cc: Joy Munkers, Director of Planning & Development