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October 30, 2006

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



Re: *DEIS for SR 520 Bridge Replacement*
Pedestrian/Bicycle Connection at Madison Park

Dear Mr. Krueger:

We write to supplement earlier comments submitted on behalf of SWAMP – Save the Wetlands of the Arboretum from Multitudes of People. Those earlier comments dated September 22, 2006 demonstrated why an additional pedestrian/bicycle connection at 37th Ave. East would violate NEPA, SEPA, the Clean Water Act, the federal Department of Transportation Act and Seattle’s Critical Areas Ordinance, and would unnecessarily exacerbate environmental impacts of the bridge.

We write now to provide the results of a year long wildlife study comparing the relative impacts of proposed pedestrian/bicycle connections at 43rd Ave. East and 37th Ave. East. The enclosed study, *Plant and Animal Studies Along Two Proposed Bike Trail Routes: SR 520 Bridge to Madison Park* (September 2006) was prepared by wildlife biologists at Raedeke Associates, Inc. and concludes that the 37th Ave. East street end and near shore environment provide substantially greater abundance and diversity of plants and animals than the 43rd Ave East street end. This report supplements the earlier *Wetland and Wildlife Assessment* prepared by Raedeke Associates in August 9, 2005. To be sure that it is part of the EIS comment record, I have also included a copy of Raedeke’s 2005 report.

As you can see at Tables 1 - 3, the 2006 Raedeke study is based upon the collection of data at the two sites between October 2005 and September 2006 and concludes that for all seasons the 37th Ave. East street end provides far greater numbers and diversity of bird species than the 43rd Ave. East site. Accordingly, the impacts of pedestrian/bicycle connection at 37th Ave. East would be substantially greater than at 43rd Ave. East.

We request that this study be included with the *Draft EIS on the SR 520 Bridge*

C-031-001

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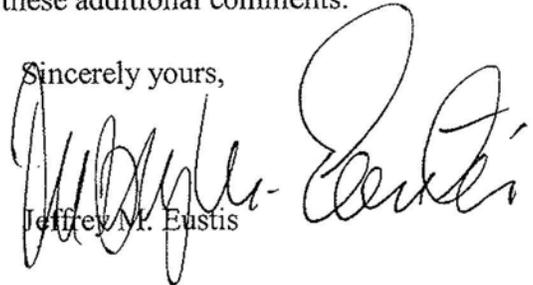
C-031-001

Replacement and in particular with the *Madison Park Bicycle/Pedestrian Path Options Technical Memorandum*. The enclosed study fills two obvious gaps in the *Technical Memorandum*: 1) it provides objective data supporting the relative abundance and diversity of plant and bird species at the two sites; and 2) it offers an objective basis for comparing the relative impacts of pedestrian/bicycle bridges at those sites.

Under NEPA, SEPA, the Clean Water Act, the federal Department of Transportation Act and Seattle's Critical Areas Ordinance the state is obliged to select alternatives of lesser impact. The enclosed wildlife study, together with Raedeke's earlier *Wetland and Wildlife Assessment* (August 9, 2005) clearly demonstrate 43rd Ave East to be the connection of lesser impact. Nonetheless, SWAMP continues to question the justification for either pedestrian/bicycle connection, given their projected costs and the existence of other connections with far fewer environmental impacts.

SWAMP appreciates your consideration of these additional comments.

Sincerely yours,



Jeffrey M. Eustis

JME/km
cc: SWAMP

**PLANT AND ANIMAL STUDIES ALONG
TWO PROPOSED BIKE TRAIL ROUTES:
SR 520 BRIDGE TO MADISON PARK**

**Final Report to: S.W.A.M.P
King County, Washington**

September 28, 2006

RAEDEKE ASSOCIATES, INC.

Project Manager: Dale R. Herter, M.S.
Associate/Wildlife Biologist

Project Personnel: Joel W. Merriman, M.S.
Wildlife Biologist

Lisa J. Danielski, B.S.
Wetland Ecologist and Botanist

INTRODUCTION

This report documents our observations on numbers and diversity of birds and vegetation studied at the two proposed bike trail routes from the new SR 520 Bridge and the Madison Park neighborhood. We comment on differences in numbers and diversity of birds at each location and contrast this diversity to other sites on Lake Washington. Avian studies were completed from October 2005 through September 2006. Vegetation transect data were gathered in October 2005.

METHODS

Bird Observations

We conducted twice-monthly observations of all water birds and land birds seen within the proposed bike trail routes at both the 37th Avenue East (hereafter 37th Avenue) street end and the 43rd Avenue East (hereafter 43rd Avenue) street end. We observed birds for 1 hour consecutively at each location beginning in mid-October and continuing through late December. Observations were taken from docks and/or in a canoe or row-boat to observe all areas that could be affected by the bike routes. The starting time for observations varied from early morning to late afternoon to span the time of day that birds could be using the affected areas. We also alternated starting locations between the 37th Avenue end and the 43rd Avenue end between visits.

Birds were first observed from land prior to moving into each area with a canoe or row-boat because some birds flushed from the observation areas once the watercraft was launched. We included all birds seen, even though some birds flying over the sites may not have been directly associated with the sites, however some flying birds were foraging from the air over the sites. Both areas are approximately equal in size and include all habitats (on land or water) that could be impacted by the routes and a 100-meter disturbance envelope on each side of the proposed trails.

Vegetation Transects

We documented the vegetation present along both bike trail routes using 200-meter long transects with twenty 1-meter² plots taken at 10-meter intervals along each transect line. We used a canoe to access shallow lakebed and wetland areas. We estimated plant cover using a 1-meter² plot frame made of detachable PVC tubing that floated on the water. We took visual estimates of percent area of plant cover on each plot and included all layers, from below the water surface to tree branches hanging over the plot grid. Measurements were taken on 19 October 2005, prior to major senescence of forbs and aquatic plants. We did not sample street-side areas along each street because most of the plants in these areas were ornamentals planted on private lots.

RESULTS

Birds

The diversity of bird species was generally greater at the 37th Avenue E observation site than at the 43rd Avenue E site during most of the 24 survey visits (Table 1). On only one visit (9 February 2006) did we count the same number of bird species on each route. On a few visits we counted fully twice the number of bird species at the 37th Avenue site than at the 43rd Avenue site. We observed several nesting birds at the 37th Avenue site, including successful nesting by mallards, gadwalls, wood ducks, song sparrows, cedar waxwings, and bushtits which all produced broods of young in the vicinity. There is a greater diversity of habitats for birds present in the 37th Avenue area, including a small area of native forest, emergent shrubby and herbaceous wetlands, and floating and submerged aquatic vegetation over a shallow lake bed. These areas provide safe feeding and nesting sites that are removed from regular human disturbance.

Habitat in the vicinity of the 43rd Avenue street end is mostly non-native suburban yards bordering a gravelly lakeshore that slopes rather steeply to deep water. Water birds that dive for food (such as grebes and diving ducks) were the only group that appeared to be more common at the 43rd Avenue site, while shallow water dabbling ducks, raptors, shorebirds, and native wetland and woodland birds were more common and diverse (more species present) at the 37th Avenue site. The only nest we observed at the 43rd Avenue site was that of a green heron initiating a nest in shore side trees which eventually failed due to crow predation. Broods of starlings, house sparrows, and white-crowned sparrows were also observed at the 43rd Avenue site. The site receives greater boat traffic and regular human disturbance from the nearby apartments and condominiums.

Overall, we counted 2693 birds of 77 species at the 37th Avenue site over the entire year, while counting 1634 birds of 52 species at the 43rd Avenue site during the same time period. Tables showing our survey results are presented in Table 2.

Vegetation

Vegetation was more diverse on transects from the 37th Avenue street end than from the 43rd Avenue street end. Again, the wetland edge, and shallow lake bed at the 37th Avenue site provides better growing conditions for a variety of plants than does the rather deep lake bed and wind-washed shore at the 43rd Avenue site. Native terrestrial vegetation was also generally more abundant in the 37th Avenue area than in the 43rd Avenue area. The introduced white water-lily dominates aquatic habitats in this area, but it appears to provide similar habitat for water birds as does the species it replaced, the native yellow water lily. We found that the submergent plant community was not dominated by the introduced Eurasian water milfoil, but was dominated by native plants, which provide food for the large flocks of common coots and other waterfowl which used the site in abundance during the non-breeding season.

Tables 3 provides a summary of the results of our vegetation transects. This table shows an average percent cover over the entire transect at each location for all species we encountered.

Other Species

In addition to birds, we observed individual beaver, muskrat, and river otter using the 37th Avenue site on at least 3 days. We observed one muskrat on 1 day at the 43rd Avenue site.

DISCUSSION

Our studies at the two proposed bike trail routes indicate that the 37th Avenue route, in general, provides more important habitat for birds than does the 43rd Avenue route. The preponderance of native terrestrial vegetation, the extensive shallow emergent and floating plant communities, the overall variety of habitat types, and the isolation from human disturbance all combine to make this portion of the Lake Washington shore at the 37th Avenue street end an unusually diverse habitat area for birds.

The street end, although public, is used by only a few people during each day, generally hikers and picnickers from local neighborhoods. This provides a little-disturbed corner of the Foster Island wetlands where water birds and raptors, in particular, can find loafing sites free of frequent human intrusion. The site appears to be an important feeding area for flocks of waterfowl that winter on Lake Washington. Fish-eating birds such as grebes and cormorants also commonly use the site, feeding on both native and introduced fish species that often compete or predate on native salmon fingerlings. Human disturbance, particularly if irregular and unpredictable, and by humans outside of vehicles (which is more threatening to the animals) such as a trail, tends to be more disturbing to wildlife than regular, non-threatening structures such as an elevated roadway or other structure with regular vehicle traffic.

Terrestrial and wetland thickets such as those at the 37th Avenue street end are now rare on Lake Washington and provide safe nesting sites for several bird species during the spring and summer, and appear to be only infrequently used by American crows, a common nest predator in the Seattle area. Migrant songbirds also use the site both in spring and fall, where the dense waterside vegetation provided good foraging for migrating insectivorous birds.

Lake Washington in general is characterized by urbanized shorelines, docks and marinas, and non-native urban plantings. The 37th Avenue street end provides habitat for birds that is rare today along the lake shore. The 43rd Avenue site, in contrast, provides habitats that are common along Lake Washington. The lawns and ornamental plantings at this street end, and the generally steep lake bed are both common habitats found on the shorelines of the lake. The lower numbers and diversity of birds at this site is typical of that found along the remainder of lake, except for those few areas where natural wetland fringes predominate, such as the Foster Island wetland complex and the Mercer Slough area on the east side of the lake.

SUMMARY

Although the 43rd Avenue street end does provide habitat for some bird species, both numbers and diversity appear to be much lower than in the vicinity of the 37th Avenue street end. This pattern of abundance and diversity of birds between the two sites persists throughout the year and encompassed all 4 seasons studied. Impacts from a proposed bike trail are anticipated to be greater on native vegetation, wildlife habitat, and bird populations at the 37th Avenue site than at the 43rd Avenue site.

Limitations

The determination of ecological system classifications, functions, values, and risk assessments is an inexact science, and different individuals and agencies may reach different conclusions. We cannot guarantee the outcome of such determinations. Therefore, the conclusions of this report should be reviewed by the appropriate regulatory agencies.

We warrant that the work performed conforms to standards generally accepted in our field, and prepared substantially in accordance with current technical guidelines and criteria. The conclusions of this report represent the results of our analysis of the information provided by project proponent and their consultants, together with information gathered in the course of the study. No other warranty, expressed or implied, is made.

Table 1.

**Bird Observations at Alternative Routes for the Proposed SR 520 Bike Trail to Madison Park
37th Avenue E. Route**

| | 19-Oct | 26-Oct | 9-Nov | 22-Nov | 12-Dec | 29-Dec | 10-Jan | 26-Jan | 9-Feb | 23-Feb | 9-Mar | 23-Mar | 11-Apr | 26-Apr | 12-May | 26-May | 9-Jun | 29-Jun | 7-Jul | 27-Jul | 7-Aug | 23-Aug | 8-Sep | 23-Sep | Total | Average | |
|------------------------------|--------|--------|-------|--------|--------|--------|--------|--------|-------|--------|-------|--------|--------|--------|--------|--------|-------|--------|-------|--------|-------|--------|-------|--------|-------|---------|--|
| Oct. 2005 - Sep. 2006 | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total Number of Birds | 86 | 60 | 114 | 240 | 97 | 202 | 276 | 161 | 125 | 85 | 104 | 98 | 108 | 58 | 75 | 61 | 77 | 73 | 85 | 84 | 60 | 113 | 138 | 113 | 2693 | 112 | |
| Total No. Water Birds | 75 | 51 | 99 | 233 | 89 | 183 | 175 | 123 | 73 | 74 | 63 | 61 | 62 | 31 | 11 | 14 | 22 | 20 | 28 | 17 | 17 | 30 | 41 | 76 | 1668 | 70 | |
| Total No. Land Birds | 11 | 9 | 15 | 7 | 8 | 19 | 101 | 38 | 52 | 11 | 41 | 37 | 46 | 27 | 64 | 47 | 55 | 53 | 57 | 67 | 43 | 83 | 97 | 37 | 1025 | 43 | |
| Number of Species | 20 | 17 | 23 | 18 | 16 | 19 | 26 | 27 | 15 | 19 | 28 | 27 | 26 | 20 | 30 | 24 | 24 | 23 | 23 | 22 | 14 | 20 | 21 | 25 | 77 | 24 | |
| No. Water Bird Species | 12 | 13 | 12 | 13 | 12 | 11 | 14 | 10 | 10 | 11 | 13 | 11 | 10 | 9 | 5 | 5 | 5 | 6 | 5 | 5 | 5 | 7 | 8 | 12 | 30 | 10 | |
| No. Land Bird Species | 8 | 4 | 11 | 5 | 4 | 8 | 12 | 17 | 5 | 8 | 15 | 16 | 16 | 11 | 25 | 19 | 19 | 17 | 18 | 17 | 9 | 13 | 13 | 13 | 47 | 14 | |

43rd Avenue E. Route

| | 19-Oct | 26-Oct | 9-Nov | 22-Nov | 12-Dec | 29-Dec | 10-Jan | 26-Jan | 9-Feb | 23-Feb | 9-Mar | 23-Mar | 11-Apr | 26-Apr | 12-May | 26-May | 9-Jun | 29-Jun | 7-Jul | 27-Jul | 7-Aug | 23-Aug | 8-Sep | 23-Sep | Total | Average |
|------------------------------|--------|--------|-------|--------|--------|--------|--------|--------|-------|--------|-------|--------|--------|--------|--------|--------|-------|--------|-------|--------|-------|--------|-------|--------|-------|---------|
| Total Number of Birds | 67 | 78 | 24 | 58 | 302 | 38 | 58 | 75 | 52 | 86 | 55 | 95 | 59 | 28 | 23 | 51 | 45 | 57 | 52 | 44 | 38 | 106 | 108 | 35 | 1634 | 68 |
| Total No. Water Birds | 48 | 72 | 18 | 46 | 297 | 26 | 51 | 61 | 45 | 84 | 48 | 74 | 46 | 9 | 4 | 22 | 23 | 21 | 29 | 16 | 6 | 17 | 10 | 23 | 1096 | 46 |
| Total No. Land Birds | 19 | 6 | 6 | 12 | 5 | 12 | 7 | 14 | 7 | 2 | 7 | 21 | 13 | 19 | 19 | 29 | 22 | 36 | 23 | 28 | 32 | 89 | 98 | 12 | 538 | 22 |
| Number of Species | 15 | 16 | 8 | 13 | 14 | 4 | 13 | 13 | 15 | 15 | 16 | 18 | 16 | 11 | 12 | 14 | 14 | 17 | 12 | 11 | 12 | 17 | 12 | 13 | 52 | 15 |
| No. Water Bird Species | 12 | 12 | 6 | 8 | 12 | 3 | 10 | 10 | 12 | 14 | 12 | 13 | 11 | 6 | 3 | 4 | 7 | 5 | 3 | 3 | 4 | 4 | 2 | 7 | 27 | 8 |
| No. Land Bird Species | 3 | 4 | 2 | 5 | 2 | 1 | 3 | 3 | 3 | 1 | 4 | 5 | 5 | 5 | 9 | 10 | 7 | 12 | 9 | 8 | 8 | 13 | 10 | 6 | 25 | 7 |

Table 2.

Abundance and Frequency of Birds Encountered at the Two Proposed Bike Paths

| Species | 37th Ave. 43rd Ave. | | 37th Ave. 43rd Ave. | |
|--------------------------|---------------------|-----|------------------------|-----|
| | Number Encountered | | Frequency of Occurance | |
| WATER BIRDS | | | | |
| Pacific Loon | | 1 | | 4% |
| Western Grebe | | 10 | | 17% |
| Red-necked Grebe | | 4 | | 13% |
| Pied-billed Grebe | 40 | 22 | 67% | 58% |
| Horned Grebe | 2 | 2 | 4% | 8% |
| Double-crested Cormorant | 25 | 43 | 50% | 50% |
| Great Blue Heron | 21 | 2 | 63% | 8% |
| Green Heron | | 3 | | 8% |
| Canada Goose | 79 | 121 | 50% | 67% |
| Mallard | 117 | 49 | 88% | 50% |
| Northern Pintail | 2 | | 4% | |
| Northern Shoveler | 3 | | 8% | |
| American Wigeon | 21 | 4 | 25% | 8% |
| Gadwall | 110 | 14 | 67% | 29% |
| Green-winged Teal | 17 | | 29% | |
| Wood Duck | 61 | 3 | 63% | 8% |
| Ring-necked Duck | 181 | 148 | 46% | 42% |
| Bufflehead | 178 | 133 | 54% | 58% |
| Canvasback | | 8 | | 8% |
| Greater Scaup | 1 | 5 | 4% | 13% |
| Lesser Scaup | 63 | 87 | 42% | 42% |
| Common Goldeneye | | 19 | | 38% |
| Surf Scoter | | 1 | | 4% |
| Common Merganser | 6 | 14 | 17% | 25% |
| Red-breast. Merganser | 1 | | 4% | |
| Hooded Merganser | 3 | | 4% | |
| American Coot | 657 | 289 | 63% | 42% |
| Virginia Rail | 1 | | 4% | |
| Sora | 1 | | 4% | |
| Killdeer | 2 | | 4% | |
| Spotted Sandpiper | 2 | | 4% | |
| Mew Gull | 6 | 2 | 13% | 8% |
| Ring-billed Gull | 32 | 26 | 46% | 54% |
| California Gull | 1 | 14 | 4% | 13% |
| Glaucous-winged Gull | 25 | 69 | 67% | 75% |
| American Herring Gull | 2 | | 8% | |
| Belted Kingfisher | 8 | 3 | 33% | 13% |

Table 2 (cont.)

| | 37th | 43rd | 37th | 43rd |
|---------------------------|--------------------|-------------|------------------------|------|
| LAND BIRDS | Number Encountered | | Frequency of Occurance | |
| Bald Eagle | 6 | | 21% | |
| Red-tailed Hawk | 2 | | 8% | |
| Cooper's Hawk | 1 | | 4% | |
| Sharp-shinned Hawk | 1 | | 4% | |
| Peregrine Falcon | | 1 | | 4% |
| Rock Pigeon | 36 | 53 | 54% | 54% |
| Band-tailed Pigeon | | 1 | | 4% |
| Vaux's Swift | 41 | 45 | 17% | 8% |
| Anna's Hummingbird | 24 | | 71% | |
| Northern Flicker | 5 | | 17% | |
| Downy Woodpecker | 17 | | 54% | |
| Western Wood Pewee | 2 | 1 | 8% | 4% |
| American Crow | 63 | 48 | 96% | 79% |
| Steller's Jay | 1 | 2 | 4% | 8% |
| American Robin | 67 | 22 | 67% | 29% |
| Brown Creeper | 1 | | 4% | |
| Bewick's Wren | 19 | 4 | 54% | 13% |
| House Wren | 1 | | 4% | |
| Marsh Wren | 13 | 1 | 42% | 4% |
| Red-breasted Nuthatch | 2 | | 4% | |
| Black-capped Chickadee | 93 | 18 | 92% | 42% |
| Chestnut-backed Chickadee | 1 | | 4% | |
| Bushtit | 41 | 23 | 50% | 21% |
| Purple Martin | 1 | | 4% | |
| Barn Swallow | 52 | 40 | 29% | 42% |
| Cliff Swallow | 120 | 46 | 38% | 33% |
| Violet-green Swallow | 10 | 24 | 21% | 29% |
| Ruby-crowned Kinglet | 7 | | 21% | |
| Golden-crowned Kinglet | 2 | | 8% | |
| Cedar Waxwing | 18 | 2 | 29% | 4% |
| European Starling | 138 | 98 | 46% | 42% |
| Warbling Vireo | 3 | | 13% | |
| Orange-crowned Warbler | 1 | | 4% | |
| Wilson's Warbler | 3 | | 8% | |
| Yellow Warbler | 2 | 1 | 8% | 4% |
| Yellow-rumped Warbler | 5 | | 8% | 0% |
| Song Sparrow | 46 | 4 | 88% | 17% |
| White-crowned Sparrow | 1 | 13 | 4% | 25% |
| Dark-eyed Junco | 6 | 1 | 13% | 4% |
| Spotted Towhee | 4 | | 13% | |
| Black-headed Grosbeak | 2 | | 8% | |
| House Finch | 55 | 19 | 63% | 29% |
| Purple Finch | 1 | | 4% | |
| American Goldfinch | 31 | 12 | 54% | 4% |
| Western Tanager | 1 | | 4% | |
| Brewer's Blackbird | 4 | | 4% | |
| Red-winged Blackbird | 71 | 6 | 79% | 8% |
| Brown-headed Cowbird | 3 | | 4% | |
| House Sparrow | 1 | 53 | 4% | 63% |
| TOTAL | 2693 | 1634 | | |

Table 3.
Average Percent Plant Cover of Species Encountered on the Two Bike Path Routes

| Species | 37th Avenue E. | 43rd Avenue E. |
|------------------------------|----------------|----------------|
| Trees and Shrubs | | |
| Black Cottonwood | 1.25 | |
| Oregon Ash | | 0.05 |
| Scouler's Willow | 1.50 | |
| Sweet Cherry | 1.05 | |
| European Holly | 0.20 | |
| English Laurel | | 0.75 |
| Butterfly Bush | | 1.75 |
| Himalayan Blackberry | 8.20 | 1.00 |
| English Ivy | 0.40 | 1.25 |
| European nightshade | 1.25 | |
| Pacific Willow | 0.05 | |
| Herbs and Grasses | | |
| Giant Horsetail | 1.50 | |
| Field Bindweed | 0.50 | |
| Creeping Buttercup | 0.50 | |
| Small Bedstraw | 0.25 | |
| Small-flowered Forget-me-not | 3.25 | |
| Dovefoot Geranium | 0.05 | |
| Seaside Trefoil | 0.05 | |
| Primrose | 0.05 | |
| Beggarticks | 0.10 | |
| Tufted Vetch | 0.05 | |
| Common Dandelion | 0.05 | |
| Hawkweed | 0.05 | |
| Bluegrass | 5.25 | |
| Sweet Vernalgrass | 0.25 | |
| Velvetgrass | 0.50 | |
| Tall Fescue | 0.25 | |
| Ryegrass | 0.35 | |
| Aquatics | | |
| White Water-lily | 30.75 | |
| Common Duckweed | 1.25 | |
| Purple-fringed Riccia | 0.20 | |
| Coontail | 11.30 | |
| Eurasian Water-milfoil | 0.15 | 0.05 |
| Grassy Pondweed | 0.05 | |
| White-stalked Pondweed | | 0.25 |
| Northern Water Horehound | 0.55 | |
| Common Cattail | 3.50 | |
| Common Rush | 2.50 | |



August 9, 2005

Mr. David Allen, Senior Planner
Seattle Department of Transportation
P.O. Box 34196
Seattle, WA 98124

RE: State Route 520 Proposed Bicycle Trail
Wetland and Wildlife Assessment
(RAI Project No. 2005-048-001)

Dear Mr. Allen:

This document provides an initial assessment of the effects on wetland and wildlife resources of the proposed bicycle trail access points in the Madison Park neighborhood. The proposed trail is associated with the future replacement and widening of the State Route (SR) 520 bridge across Lake Washington, for which all proposals include a bicycle/pedestrian trail running along the length of the new bridge (Draft EIS prepared under the direction of the Washington Department of Transportation; CH2M Hill 2005). A connection to the Madison Park neighborhood is being proposed by interest groups seeking access for pedestrians and cyclists to the new SR 520 bridge.

The author of this summary letter is a professional wildlife biologist with 17 years of experience in the Seattle area and who has lived near the Madison Park neighborhood for that same period of time. Many of the observations used in this letter are based on 17 years of observations in and near the site of the proposed bike trail access routes.

BACKGROUND

As of summer 2005, a Draft Environmental Impact Statement (DEIS) concerning replacement and widening of the SR 520 bridge was prepared by CH2M Hill (2005) and other consultants, and is now under public review. This document addresses environmental concerns surrounding the replacement and widening of the SR 520 bridge. Outside of the DEIS current scope, but potentially to be included in the EIS, is a proposal for a connection to the planned SR 520 pedestrian/bicycle trail that is anticipated to link the Madison Park neighborhood directly to the bridge via the 37th Avenue E street-end or the 43rd Avenue E street-end (see Figure 1). Both of these trail locations would transfer bicycle traffic from the SR 520 bridge onto side-streets in the northern portion of the Madison Park neighborhood.

The 37th Avenue E route would involve construction of a causeway to support the bicycle trail over shallow open water and a wetland complex located east of Foster Island and north of the Broadmoor Golf Course (Figure 1). A 43rd Avenue E route would also

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involve construction of a causeway across shallow open water but would not affect any wetlands identified in the City of Seattle Environmentally Critical Areas ordinance.

EXISTING CONDITIONS

Wetlands

The area around the 37th Avenue E street-end consists of a gravel-surfaced, one-lane street leading to a small wooden dock maintained by the City of Seattle. This dock is used by occasional canoeists and kayakers to access the canoe trail in the Foster Island area. Two private residence are immediately east of the street, and the outer fence surrounding the Broadmoor Golf Course is immediately west of the street. The street-end itself is in a small grove of cottonwood trees adjacent to aquatic bed wetlands which surrounds the dock. Immediately adjacent to the dock is a white water lily/Eurasian milfoil plant community. Approximately 75 feet off the end of the dock are emergent and scrub/shrub wetland communities.

The wetland complex near the 37th Avenue E route is designated as an Environmentally Critical Area by the City of Seattle, Department of Planning and Development (DPD). According to Seattle Municipal Code, an Environmentally Critical Area may include: (1) geologic hazard areas, (2) flood-prone areas, (3) riparian corridors, (4) wetlands, (5) fish and wildlife habitat conservation areas, and (6) abandoned land-fills. The wetland that would be affected by the 37th Avenue E route is a complex lake-fringe wetland consisting of aquatic bed submerged and floating plants, shallow water emergents, scrub-shrub, and forested wetland plant communities. All plant community types would be affected by the 37th Avenue E route. A description and abbreviated list of plants found in these plant communities follows:

Aquatic bed: This vegetation community occurs in shallow water with a mud or silt bottom dominated by the floating leaves of white water-lily (*Nymphaea odorata*) and pondweeds, (*Potamogeton* spp.) along with submerged aquatics such as Eurasian water-milfoil (*Myriophyllum spicatum*), coontail (*Ceratophyllum demersum*), and waterweeds (*Elodea* sp.).

Emergent: This community is composed of what is commonly referred to as open marsh vegetation dominated by cattails (*Typha* spp.) and bur-reeds (*Sparganium* spp.), with purple loosestrife (*Lythrum salicaria*) and yellow water flag, (*Iris pseudacorus*) also common.

Scrub/Shrub: A large part of the wetland consists of woody plants growing in saturated soils, dominated by hardhack spirea (*Spiraea douglasii*), willows (*Salix* spp.), red-osier dogwood (*Cornus sericea*), high-bush cranberry (*Viburnum edule*), and paper birch (*Betula papyrifera*).

Forested wetland: Dominated by an overstory of black cottonwood (*Populus balsamifera*), red alder (*Alnus rubra*), and Oregon ash (*Fraxinus latifolia*), with an

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understory of Indian plum (*Oemleria cersiformis*), common snowberry (*Symphoricarpos albus*), Himalayan blackberry (*Rubus discolor*), salmonberry (*Rubus spectabilis*), thimbleberry (*Rubus parviflorus*), and giant horsetail (*Equisetum telmateia*).

Based on field review in August 2005, we rated this wetland as a Category II wetland, following the Washington State Department of Ecology wetland rating system currently adhered to by the Seattle Department of Planning and Development [(DPD) formerly the Department of Construction and Land Use (DCLU)]. This indicates that it is a wetland that is difficult to replace, and which provides high levels of water quality, hydrologic, and/or wildlife habitat functions. Seattle DPD regulations require that any wetland determined to be an Environmentally Critical Area receive a 50-foot no entry buffer if development is proposed near the wetland. This buffer may be increased to 100 foot or possibly 125 feet if the wetland is determined to have high habitat value. The City of Seattle DPD has determined that this wetland is a “wetland of exceptional value” (Ms. Donna Talley, DCLU from the notes of a December 1, 1994 Inter-agency meeting). This designation was likely given because of the general lack of large, lake-fringe wetlands on Lake Washington and its overall value to local wildlife populations.

Wildlife Habitat

The wetland complex in the west Union Bay/Foster Island area constitutes some of the largest lake-fringe wetlands remaining on the shores of Lake Washington. This area is of significant wildlife habitat value and the abundance of birds and mammals provide recreational opportunities to city residents at all seasons. During the spring and summer, nesting waterfowl such as Canada geese, mallards, wood ducks, and American coots, as well as green herons, Virginia rail, red-winged blackbird, common yellowthroat, yellow warbler, song sparrow, and marsh wren attract the attention of canoeists and hikers using the nearby canoe trails and recreational trails in the area. In fall and winter, large groups of wintering waterfowl use the bay and associated wetlands as a feeding and refuge area. It is common in the winter to observe groups of dabbling ducks such as wood duck, mallard, northern pintail, gadwall, American wigeon, and green-winged teal, as well as coots and pied-billed grebes feeding in the wetlands, with larger flocks of diving ducks, including common and Barrow’s goldeneye, lesser scaup, canvasback, ring-necked duck, and bufflehead feeding in the protected, shallow waters surrounding the wetlands. The site is also used by a number of fish-eating species such as great blue heron, double-crested cormorant, western grebe, common and hooded merganser, and belted kingfisher.

During all seasons, a pair of bald eagle uses the site and has established at least three different nest trees in the immediate area (WDFW Broadmoor bald eagle territory #1979; see Figure 1). The easternmost nest tree is located on the Broadmoor Golf Course and is placed in a large crook of a tall Douglas fir. This nest is within 250 feet of 37th Avenue E and was active in 2005. The nest contained a nearly-fledged juvenile eagle based on field review in early August 2005. The other nest sites are major crooks in large black cottonwood trees and have both been active in recent years. The bald eagles regularly forage in the wetland complex, attracted to both fish and waterfowl prey common in the shallow waters. Red-tailed and Cooper’s hawk and osprey also regularly use the nearby

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wooded areas and wetlands, respectively, for hunting. A red-tailed hawk nest has been reported near the area by Broadmoor Golf Course staff.

Also present in the wetland are signs of mammal activity, including beaver-cut trees and a recently active beaver lodge approximately 75 feet from the end of 37th Avenue E. There are also frequent sightings of muskrat, river otter, and mink by trail users in association with this wetland complex.

Lake-fringe wetlands also provide breeding and rearing habitat for several species of fish that are resident in Lake Washington, such as brown bullhead and pike-minnow. These species establish nest sites in very shallow waters, often in areas of submerged aquatic plants and floating aquatic plants. These fish in turn often become food for birds and migrating and resident salmonids such as coho, Chinook, and sockeye salmon, as well as bull and cutthroat trout.

ASSESSMENT OF IMPACTS

Wetlands

In the Development Standards for Wetlands in the City of Seattle's Environmentally Critical Areas regulations, Section 25.09.160, it states that, "No grading, filling, draining, and/or development shall be permitted within or over *wetlands of exceptional value* and its buffer as delineated by a survey accepted by the Director." The wetlands north of the 37th Avenue E street-end have been termed wetlands of exceptional value by a City employee (op. cit.) and their consultant (letter dated June 1, 1998 from Dyanne Sheldon to Kevin Stoops, Seattle Department of Parks and Recreation). Their value to local wildlife has been reiterated by both the Seattle Audubon Society (letter dated January 8, 1998 by Kit Walther to Seattle Department of Parks and Recreation) and the Washington Department of Fish and Wildlife (letter dated April 2, 1990 from Ted Muller to Carroll Smith, Seattle Engineering Department, and letter dated April 16, 1993 to Cheryl Chow, Seattle City Council). The uniqueness and potential for disturbance of wildlife in the wetlands north of the Broadmoor Golf Course has probably contributed to the failure of bike and pedestrian trail proposals linking the arboretum with the Madison Park neighborhood thus far (Galloway and Barker Architects 1997, City of Seattle Department of Parks and Recreation 1999).

The wetlands near the 37th Avenue E street-end are not unusual as far as the plant communities present, however the complexity of the wetlands and their large size are unique in this part of the city. Shoreline habitat along Lake Washington has been heavily affected by residential construction, lawns, dock construction, and public facilities such as marinas, parks, and roadways. Large lake-fringe wetland complexes are only found on Lake Washington at a few locations. Only two other large wetlands currently exist on the lake, one at Sammamish Slough near Kenmore, and the other at Mercer Slough near Factoria. Lake-fringe wetlands are important because they serve to protect adjoining uplands from erosive waves or currents along the margins of large water bodies. Vegetation along the shoreline helps dissipate energy from waves that otherwise could

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erode beaches and upland areas. Lake-fringe wetlands also provide important habitat for wildlife such as amphibians and waterfowl. Vegetation in lake-fringe wetlands also can protect water quality in lakes by trapping and taking up sediments and pollutants that run-off from upland areas before they can enter the lake system.

Construction of an elevated causeway for a multi-use bicycle/pedestrian trail to 37th Avenue E would involve placement of a series of pilings into the lake bed and wetland habitats, with the resulting disturbance and shading of three or four different wetland plant communities, as well as shallow open water lake habitat. Because of its rating as a "wetland of exceptional value", a 125-foot buffer may be warranted for this wetland (Figure 1). An alternative location, construction of an elevated causeway to the 43rd Avenue E area, would involve construction over shallow open water lake habitat and suburban yards and would not affect wetlands or Environmentally Critical Areas.

In addition, other recreational opportunities other than hiking or biking at the site would likely be affected. In order to maintain a 5% grade on the bike trail from the proposed elevated western high-rise on the new SR 520 bridge, most of the 2500 block of 37th Avenue E may need to become a ramp, potentially eliminating public access to the dock and canoe routes in this area.

Wildlife

The wetland complex north of the 37th Avenue E street-end provides a relatively undisturbed resting and feeding area for a number of wildlife species that are relatively rare in the Seattle urban environment. Wintering and breeding waterfowl, and aquatic mammals concentrate in this area because of the high habitat quality and lack of human disturbance. Wildlife in this wetland have become accustomed to steady artificial noise such as the traffic on the SR 520 bridge, and a low level of nearby human activity at adjacent lawns and docks, including infrequent boaters and canoeists. This particular arm of the lake, with a heavy cover of floating plants, very shallow water, and restricted access to the remainder of the lake because of the bridge deck, has created a refuge for wildlife due to the generally low levels of human use. Wildlife will often become accustomed to steady highway traffic, however, an elevated bicycle/pedestrian ramp as proposed, would incrementally increase local human disturbance levels because of the uneven and unpredictable nature of human presence on such a structure. Such disturbance and the presence of the structure itself may reduce or even preclude use of nearby habitats by some species of wildlife. Particularly affected would be flocks of wintering and breeding waterfowl which are easily flushed by close human approach and tend to abandon habitat that is frequently and unpredictably disturbed by human activity (Josselyn et al. 1988).

Because this area provides a refuge for waterfowl, it is undoubtedly used as a hunting area by the Broadmoor bald eagle pair. At the end of 37th Avenue E is a large cottonwood tree that is of sufficient size to provide a hunting perch for the eagles. This tree may have to be removed if the access ramp for the bike trail were to be built. Large

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cottonwood trees are uncommon adjacent to the lake shore and wetlands of Union Bay and Foster Island, so this tree may be of particular value to this pair of eagles. The beaver lodge just off the end of 37th Avenue E would probably also have to be removed during construction of the ramp. An even larger lodge will probably be removed during construction of the SR 520 bridge, multiplying impacts to this species (CH2MHill 2005). If approval is given to build the access ramp (possibly up to 14 ft. wide), some aquatic bed habitat, emergent habitat, and scrub/shrub habitat would also be removed to install the ramp. Shading of these habitats and the ramp itself may preclude use of the habitats by most wildlife post-construction.

Construction of a new ramp for a bike trail from the end of 37th Avenue E would involve disturbance of wetland habitats and their buffers as described above. Extensive wetlands are rare on the Lake Washington shoreline and the remaining wetlands provide important habitat for many species of wildlife, including the threatened bald eagle. Avoidance of impacts by not constructing the causeway across wetlands would be the primary technique in minimizing or eliminating impacts to these critical habitats. Elevating a causeway for the bike trail would result in lesser shading affect, however disturbance of wildlife dependent on this wetland would remain a serious consideration.

CONCLUSIONS

A route via the 37th Avenue E street-end would result in filling, shading, and disturbance to an important urban wetland and the relatively undisturbed wildlife habitat that it provides. The site is designated as a City of Seattle Environmentally Critical Area, and has been termed a "wetland of exceptional value", which may receive as much as a 125-foot buffer, indicating that avoidance and/or mitigation for loss of habitat would be difficult. An alternative route to the 43rd Avenue E street-end, while not the focus of this study, would likely result in lesser impacts to wetlands and wildlife habitat.

Sincerely,

RAEDEKE ASSOCIATES, INC.



Dale R. Herter, Wildlife Biologist

cc: S.W.A.M.P.(Save the Wetlands of the Arboretum and Madison Park)

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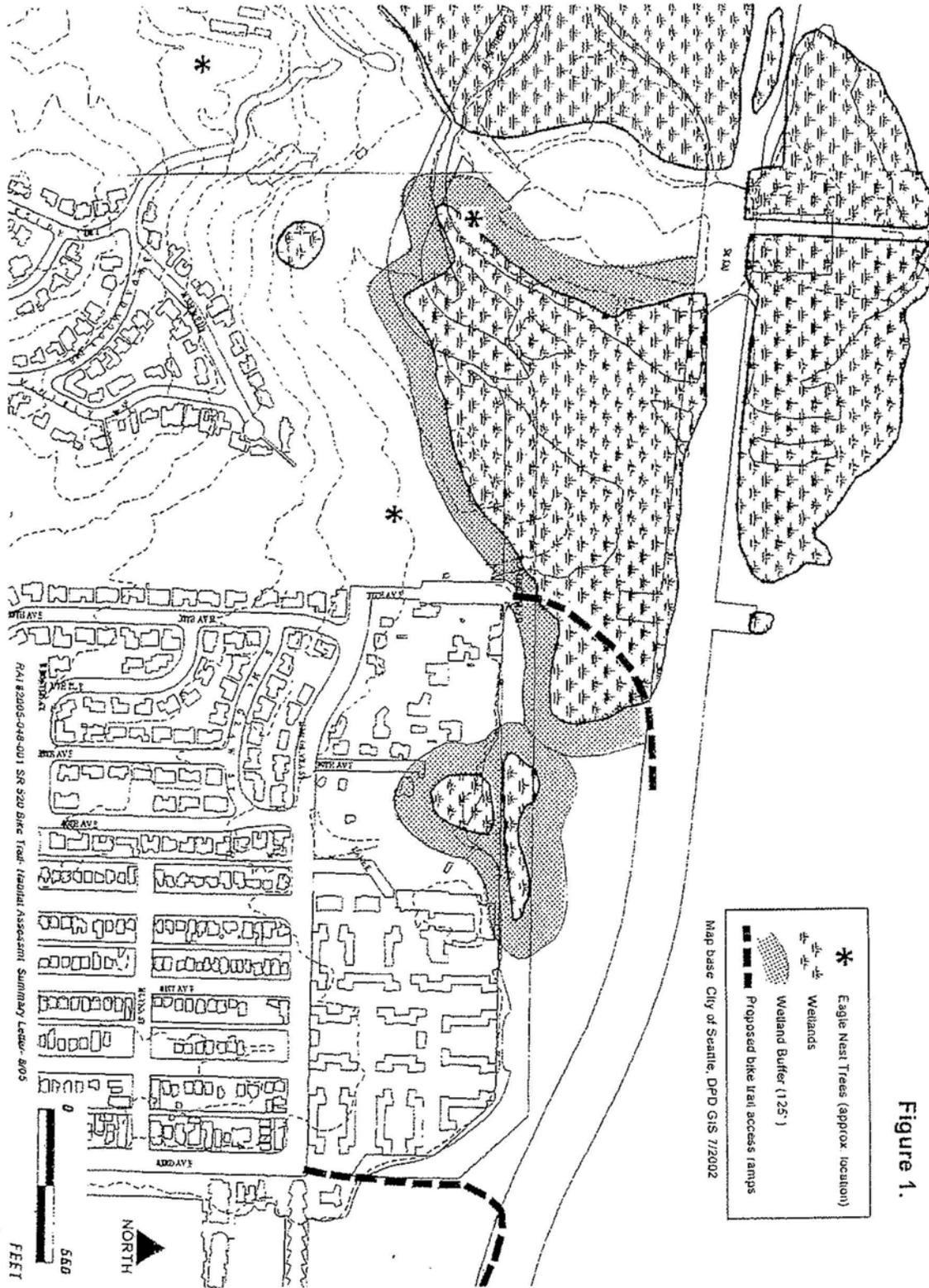


Figure 1.

From: [Jonathan Dubman](#)
To: [SR 520 DEIS Comments](#);
CC: jon@dubman.com; [Rob Wilkinson](#);
Subject: BetterBridge org SR 520 public comment.doc
Date: Wednesday, November 01, 2006 12:00:40 AM
Attachments: [BetterBridge org SR 520 public comment.doc](#)

Caught some typos. Please use this version. Thank you.

*** eSafel scanned this email and found no malicious content ***
*** IMPORTANT: Do not open attachments from unrecognized senders ***



October 31, 2006

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C-032-001

BetterBridge.org is a 501c(4) organization formed to play a constructive advocacy role on the SR 520 Bridge Replacement & HOV Project. We are proud to have suggested concepts that eventually led to WSDOT's official Pacific Street Interchange for SR 520. We at BetterBridge.org strongly support the 6-lane Pacific Street Interchange option for SR 520, and oppose all other DEIS options.

Origin of BetterBridge.org

BetterBridge.org was co-founded by Rob Wilkinson and Jonathan Dubman, who suggested a daring new approach for SR 520 via an Opinion piece in the Seattle Times in February of 2005. These concepts were quickly met with interest and enthusiasm in the Montlake community, among elected officials and countless other interested parties with whom we have met. Some 162 individuals and groups have donated money to fund BetterBridge.org, and many have volunteered in various capacities.

C-032-002

Appreciation for the SR 520 project team

Throughout this process, we have been absolutely delighted that WSDOT has been willing to listen, and has given all the citizen-generated ideas, ours included, serious and fair consideration. We have come to understand that the SR 520 project team is led by and comprised of exemplary public servants who deserve enormous credit for their hard work, dedication, flexibility and objectivity. The project has clearly gone to enormous efforts to do public outreach, to provide concerned citizens, jurisdictions, agencies, etc. with clear, accurate, relevant and timely

C-032-002 | information in an objective manner, and to listen to and respond to everyone's concerns. This track record bodes very well for the hard work ahead as we move towards an FEIS, a Record of Decision, years of construction and many decades of operation of a new SR 520 facility.

We want to take this opportunity to make a special remark on the record concerning the outstanding legacy of the late Maureen Sullivan, at one time the head of both the SR 520 and the Alaskan Way Viaduct projects, whose skillful leadership helped guide the SR 520 project through challenging times. She combined professionalism with warmth, openness and a willingness to listen, and has left a legacy in our hearts as well as on this project.

Pacific Street Interchange is the only solution to averting stalemate on SR 520

Prior to the addition of the Pacific Street Interchange option, it appeared to us that we were headed for a stalemate on SR 520 that would serve nobody's interests. There were adamant supporters of a 4 lane floating bridge, an 8 lane floating bridge. It was our perception that neither of these would be politically viable regionally, and neither would meet our transportation needs. The latter is borne out by the facts of the analysis in this DEIS. On March 1, 2005, a meeting (organized by a large coalition of neighborhood organizations, BetterBridge.org not included) was held at the Museum of History and Industry to send a clear message that none of the alternatives on the table at that time was acceptable. The meeting had about 350 attendees including SDOT, the office of the Mayor of Seattle, and every member of the Seattle City Council, or a representative thereof. Essentially, the project was perceived as having unacceptable impacts and insufficient transportation benefit.

C-032-003 | Major advantages of Pacific Street Interchange

Pacific Street Interchange is the only option that creates a direct, fast and reliable connection between SR 520 bus service and light rail.

Pacific Street Interchange is the only option that restores a continuous greenbelt linking Portage Bay with Union Bay and the Arboretum.

Pacific Street Interchange is the only option that fixes the Montlake Bridge bottleneck, saving over 20 minutes for trips from 45th St. to SR 520 in the PM peak period.

Pacific Street Interchange adds HOV lanes for the length of the corridor without necessitating an 8 or 9 lane Portage Bay Viaduct.

When no alternative is specified in the comments below, the comments should be interpreted as referring to the Pacific Street Interchange option.

C-032-004 | On our original suggestion of a high-level suspension or cable-stayed bridge

We originally suggested a pair of high level suspension or cable-stayed bridges, with a Pacific Street Interchange. Suspension and cable-stayed bridges were screened out due to issues including noise, constructibility, cost, environmental impacts. Although a high level bridge was thought to be possible, from discussions with WSDOT, we arrived at the belief that a new facility closer to the current profile would be preferable in terms of visual impacts. The WSDOT team was very helpful in providing sufficient information, including renderings, to reach this conclusion.

C-032-005

Bus-rail transfer at the UW transit hub

Because the University of Washington is a critical transit destination, Sound Transit plans a light rail station in the vicinity of Montlake Blvd. / Pacific St. intersection. From this station, Sound Transit anticipates running trains as frequently as every 2.5 minutes. It will be a 6 minute train ride from UW to Westlake, 3 minutes from UW to Capitol Hill, and 7 minutes to Northgate. Via bus rapid transit, it will be about a 12 minute ride to Overlake / Microsoft from UW.

Because of the siting of a light rail station in this vicinity, the UW becomes the natural location for a transit hub that connects light rail, local and regional buses. This area, the vicinity of what is today, Triangle Parking Garage, has a lot of geometric and functional constraints, and cries out for an integrated plan. We strongly advocate that this plan be optimized for transfer between buses and light rail, to minimize the number of steps and maximize the comfort and convenience for transit patrons. This entire interchange requires a comprehensive plan that will consider the joint use of WSDOT right of way and UW property to create a pedestrian-friendly transit hub that serves both transient and local pedestrian movement in an attractive, quiet and safe manner. Grade separation, inclement weather protection, moving walkways and the needs of bicyclists should all be considered.

C-032-006

Montlake lid

The lid in Montlake should extend from Montlake Blvd. all the way east to the 24th Ave. overcrossing, with an opening for ventilation if absolutely necessary. If possible, a sidewalk and room for landscaping should be cantilevered to the north of Lake Washington Blvd., east of 24th Ave. E, linking this park to the part of the Arboretum south of SR 520 and helping to respect and restore the Olmsted legacy of Lake Washington Blvd.

C-032-007

Montlake Blvd. treatment

The outer lanes of Montlake Blvd. that currently serve on- and off-ramps for SR 520, should be striped as bicycle lanes, possibly shared with local transit if that is seen to be helpful. The "boulevard treatment" of Montlake Blvd. as envisioned by the Olmsted Brothers should extend further south across the SR 520 right of way all the way to Roanoke St.

The sidewalks along Montlake Blvd. south of the Montlake Bridge are in unsafe condition and should be repaved and brought up to current accessibility standards.

West Montlake Place E realignment

For the FEIS, please evaluate restoring the alignment of West Montlake Place E to roughly match what it was prior to SR 520 construction, while reconfiguring E Roanoke St. to be a quiet neighborhood street with planting strips, like E Louisa St., E Miller St., etc. It is important to maintain a signalized pedestrian crossing south of Lake Washington Blvd. E and north of E McGraw St. on the arterial that is variously referred to as 24th Ave E and East Montlake Place E.

C-032-008 | Mitigation for 24th Ave. E

Traffic speeds and volumes are of great concern on 24th Ave. E in the Montlake community. This community is trying to nurture a small business district, a block away from an elementary school, that is also home to a new branch of the Seattle Public Library system. Law enforcement officers have clocked numerous drivers traveling at over 60 mph through this area. Automated speed enforcement should be provided as a form of mitigation for the increased traffic volumes that are anticipated on this arterial as a result of this project.

C-032-009 | Arboretum mitigation

We believe this project should transfer ownership of the "WSDOT peninsula" to the Arboretum, and fund the Arboretum Master Plan as partial mitigation for the disruption and loss of property that the construction will cause.

We support a toll surcharge at the Lake Washington Blvd. ramps to help generate funds and to prevent an increase, and potentially decrease, the traffic volume in the Arboretum.

C-032-010 | Foster Island Loop Trail

The Foster Island Loop Trail should be brought up to current environmental standards, if possible, and should be designed such that it is above the water level of Lake Washington year round as an interpretive trail system for educational and recreational use. This trail should tie into the treatment ponds at the current MOHAI site. The exemplary water treatment facility in Renton and associated public art should be seen by all who participate in the design for water treatment facilities on SR 520.

C-032-011 | Trail link to Madison Park

BetterBridge.org strongly endorses a bicycle/pedestrian trail link to Madison Park. This connection probably makes more sense at 43rd Ave. E than at 37th Ave. E due to wetland impacts at 37th. There are navigation issues and concerns over trailhead parking. Leaders and members of the bicycle community with whom we have met have been enthusiastic about this connection, which would provide a much shorter route from the east part of Seattle to the Eastside and also to UW. The Arboretum Master Plan includes a recreational trail but does not include a commuter trail through the Arboretum, and Lake Washington Blvd. a narrow, winding roadway with high traffic volumes and poor nighttime lighting, is not bicycle-friendly, so this connection from Madison Park would provide a vital link in our region's bicycle network.

We are a bit puzzled at opposition to this idea from some residents of Broadmoor who live nowhere near 43rd Ave., as there would be no access to this trail to the Broadmoor community, nor would the trail be visible from that community.

C-032-012 | Other bicycle/pedestrian trail opportunities and issues

The SR 520 project is to be commended for its inclusion of a full 14-foot trail across Lake Washington. Every effort should be made to provide connectivity to other routes and trails on both sides of the lake. BetterBridge.org advocates extending the SR 520 bicycle trail west to Montlake Blvd. to connect with the proposed freeway lid park in Montlake, and from there down to the popular Montlake Playfield and connecting routes to Interlaken Park, Eastlake and other Seattle destinations. This should be constructed in addition to, but not in place of, a bicycle trail on the Union Bay Bridge to UW. We expect the SR 520 bicycle trail to be much more popular than the I-

C-032-012 | 90 bicycle trail, given the proximity of the Burke-Gilman trail and UW to residential districts and employment centers on the Eastside. If a connection is made on only one side of the ship canal, many bicyclists will be forced onto the narrow shoulders of the Montlake drawbridge, which will be shared with high pedestrian volumes. Additionally, extending the SR 520 bicycle trail west to Montlake would activate the park on the lid, and save about half a mile for bicycle commuters coming from or going to south of the ship canal.

With its location at the UW and its proximity to the Burke-Gilman trail, a local bicycle route across the Montlake Bridge and SR 520 bicycle trail access, the UW transportation hub at Montlake/Pacific will be a major bicycle hub as well as a transit hub. It is a natural spot for a bicycle station incorporating secure bicycle storage, rental and other services, kiosks with maps and other bicycle-related information. There are some excellent examples of this such as the facility at Millennium Park in Chicago.

A trail on the Portage Bay Bridge would have an extended, steep grade and would add significant cost and environmental impacts and need not be pursued.

C-032-013 | Mitigation opportunity: South Portage Bay Park / Montlake Playfield

With a matching neighborhood grant and participation from Seattle Parks Dept., FABNIA (Fuhrman and Boyer Neighborhood Improvement Association) has been evaluating opportunities to improve South Portage Bay Park and the Montlake Playfield with shoreline mitigation, a waterfront trail, a put-in for hand-carried boats, etc. This plan ought to be funded as mitigation for the major construction and view impacts that the rebuild of the Portage Bay Bridge will imply.

C-032-014 | Waterfront trail on NOAA property

It was once possible to walk along the shoreline of Portage Bay from the Seattle Yacht Club to the Bill Dawson trail which passes under SR 520 and connects to the Montlake Playfield. Since a near-waterfront trail is envisioned all the way west to Everett St., and there is an existing waterfront trail all the way from the Seattle Yacht Club to Foster Island, the NOAA property represents a "missing link" in what could be an approximately 1.5 mile waterfront to waterfront trail from Portage Bay to Union Bay and the Arboretum. This trail opportunity should be pursued as part of this project.

C-032-015 | Alignment of Montlake Blvd. widening north of Pacific Place.

The green wooded buffer alongside the Burke-Gilman trail is an important asset for the University of Washington campus, for trail users, and even for all those who travel along Montlake Blvd. between 45th St. and Pacific Place. Please choose an alignment for the widening of Montlake Blvd. that preserves to the greatest possible extent this wooded buffer. This would require the displacement of additional surface parking spaces on the UW campus. These parking spaces can readily be replaced through structured parking.

C-032-016 | Pedestrian crossings of Montlake Blvd. on the UW campus

There are several pedestrian crossings of Montlake Blvd. connecting the central UW campus to the east campus, athletic facilities and parking lots. These pedestrian crossings would have to be reconstructed as part of this project if Montlake Blvd. is widened. None currently meets ADA standards. These bridges would be viewed by at least 60,000 people per day passing over or underneath and should be held to a high standard of design. They should be wider, and of course, accessible, with adequate clearance. We have heard concerns that the widening of

C-032-016 | Montlake Blvd. would further divide these parts of campus. We believe that exemplary pedestrian bridges in this area would actually serve to unite the campus.

C-032-017 | Potential early action: Early widening of Montlake Blvd. with HOV lanes

With Pacific Interchange, Montlake Blvd. is widened from Pacific St. to the vicinity of 45th St. One idea that was suggested before Pacific Interchange was conceived (e.g., the City of Seattle's University Area Transportation Study) is a southbound HOV lane on Montlake Blvd., to reduce person-hours of delay on the approach to the Montlake Bridge. While this is not a solution for the whole problem, it could help achieve tangible benefits quickly, years before the completion of the SR 520 project. We would like to see the early action of adding HOV lanes north and southbound on Montlake Blvd. (to be converted eventually to GP lanes) evaluated as a form of construction mitigation. For the FEIS, provided Pacific Street Interchange is chosen as a preferred alternative, please forecast and document the reduction in daily person-hours of delay that could be achieved by the addition of HOV lanes on Montlake Blvd. (on the inside or outside lanes, as appropriate) prior to completion of the Union Bay Bridge, please assess potential transit service that could serve as construction mitigation, and please assess what would be required to accelerate construction of this arterial widening.

C-032-018 | Potential early action: Accelerate initiation of tolls on SR 520

The SR 520 project will include tolls. The Project's traffic analysis shows that these tolls have significant traffic benefits in the corridor. With legislative action and support from WSDOT and the region, these could be instituted earlier rather than later, making better use of today's SR 520 bridge, while accelerating funding for project mitigation. BetterBridge.org has suggested this in numerous public forums and found great enthusiasm for this concept. We believe the privacy issues are important, but solvable. It is vital for Washington State to have a single, reliable, low-maintenance and highly secure transponder system that is flexible enough for us to migrate to regional tolling, which is probably where we are headed. For the FEIS, please evaluate the financial and traffic implications of initiating tolls as early as possible, either regionally or on SR 520 alone if procedural issues preclude looking at the region as a whole as part of this study. This could be done in the context of any corridor development authority, public/private partnership, or other innovative approach that is eventually decided upon for designing, building, operating and maintaining the corridor.

C-032-019 | Congestion or value-pricing in the GP lanes

With the 6 lane alternatives, considerable congestion is forecast in this DEIS for the GP lanes on SR 520, particularly westbound in the morning, albeit far less than with the 4 lane alternative or No Build. While this congestion may provide an incentive for time shift, mode shift or other behavioral adaptations, it represents an economic and environmental cost that every effort should be made to avoid. For the FEIS, please attempt to determine a regional tolling policy that would implement "congestion pricing" or "value pricing" on SR 520. Please give careful consideration to what it might take to eliminate, if possible, or reduce to the maximum possible extent, congestion on the GP lanes of SR 520. Since the noise analysis already assumes posted speeds at maximum traffic volume, that should not need to be reevaluated.

C-032-020 | Width of shoulders and GP lanes in Seattle

Some are advocating for narrower shoulders and GP lanes in environmentally sensitive areas in Seattle. While we agree with the intent of this narrowing, a balanced view would consider the implications for safety and reliability. Balancing these factors will present a challenge, but it

C-032-020 | should not be assumed that narrower is necessarily better. For the FEIS, please quantify the anticipated impact to safety and reliability for narrowed shoulders and travel lanes at various widths, so the environmental impacts can be balanced against transportation impacts and public safety.

C-032-021 | 4 lanes across the lake fails to accommodate transit and lacks political support
The 4-lane option as proposed by the Project does not provide transit speed and reliability that is necessary to provide a viable transit alternative in this corridor. Buses are stuck in congestion that is projected to increase dramatically across Lake Washington, failing to meet the purpose and need of the Project.

Local transit: The Montlake mess impacts speed and reliability for some of the most productive Metro bus routes including routes 43 and 48. Unless the Montlake bottleneck is relieved, speed and reliability for local transit will continue to decline over time.

Traffic: The 4-lane option fails spectacularly for local traffic in the Montlake area, as well as for traffic on the mainline of SR 520.

Neighborhood and park impacts: The footprint of the 4 lane configuration is not only larger through Seattle than the current SR 520, but much larger, in fact, through the heart of Montlake than the footprint of Pacific Interchange. With 4 lanes, any Montlake lid (not included in DEIS) would fail to reconnect the neighborhood due to access ramps getting in the way. 4 lanes does not provide the continuous park and trail system provided by Pacific Interchange. The Montlake interchange is expanded, and overall, things are made worse for pedestrians, bicyclists, transit and local traffic. It should be noted that WSDOT's "4 lane" project has a 5 lane Portage Bay Bridge, which is almost as wide as the 6 lane Portage Bay Bridge associated with Pacific Interchange.

4 lanes may be the cheapest solution with the least Arboretum impact, but it has fatal flaws, particularly for transit.

C-032-022 | 8 lanes across the lake has multiple fatal flaws
Any configuration across Lake Washington that has more than 4 general purpose lanes is a recipe for both political gridlock and traffic gridlock. Any configuration that would add a significant amount of traffic to I-5 would essentially be predicated on widening I-5 at least as far as Fort Lewis. Expanding I-5 is neither affordable nor consistent with numerous City of Seattle policies. An 8 lane option would cause massive congestion on our arterial streets, degrading local transit performance.

Any 8 lane configuration would clearly have profound negative impacts to neighborhoods, parks and the environment.

In summary, 8 lanes across the lake would be unaffordable, unacceptable, and counterproductive to the purpose of this project.

C-032-023 | The Base 6 alternative, with 9 lanes across Portage Bay, fails on mobility and livability

The Base 6 alternative retains the Montlake interchange and the bus stop in Montlake. As developed by WSDOT, the Portage Bay Bridge must be 9 lanes due to the need for transit acceleration/deceleration and auxiliary (weaving) lanes.

C-032-023 Regional transit: The Base 6 lane alternative fails to make a fast and reliable transit connection to light rail. A 4-lane historic drawbridge forms the only connection between SR 520 and all of Northeast Seattle, including the University of Washington, the city's largest employer, and the most important light rail stop north of Westlake. Pedestrian and bicycle access to the Montlake bus stop would be very poor due to enormous congestion in the Montlake area. The Montlake bus stop would continue to separate UW and downtown-bound buses on an upper and lower level, causing confusion.

Local transit: The Base 6 alternative depends on the already over-capacity Montlake Bridge. This would imply a steady reduction in speed and reliability for some of the most productive bus routes in the region.

Neighborhood and park impacts: The physical footprint of the Base 6 alternative through Montlake and across Portage Bay is profound, prompting residents to nickname the interchange the "Montlake Monster." The total acreage of parks impacts are about par with Pacific Interchange, but the Base 6 lane option covers more parkland at ground level and has far inferior mitigation opportunities. Unlike the area underneath relatively high spans in the vicinity of Foster and Marsh Island with Pacific Interchange, parkland covered at ground level would be unusable.

C-032-024

The Second Bascule Bridge option fails on mobility and livability

The Second Bascule Bridge option (parallel Montlake drawbridge) is even worse than Base 6 in almost every regard, which explains why it has vanishingly little support. It was introduced as a potential alternate approach to reduce the footprint and increase transit connectivity, but it does not deliver on these aims.

Regional transit: The Second Bascule Bridge fails to make a fast and reliable transit connection for SR 520 buses to the UW. It is particularly unreliable in off-peak times when the drawbridge goes up, but buses are generally stuck in tremendous congestion on Montlake Blvd. The SR 520 afternoon peak hours on which the restriction on bridge opening hours is based are not aligned with the UW schedule, which has peak travel demand earlier in the afternoon, so "off peak" transit reliability is a problem for access to the UW.

Local transit: Local and regional transit both share the extremely congested Montlake Blvd., and would be equally slow and unreliable with this option.

Traffic: In some ways, congestion is actually worse with this option than without a second drawbridge. By and large it is the same bad story as the Base 6 lane alternative; there are other bottlenecks in the vicinity besides the bridge itself that are not and cannot be addressed by this plan.

Neighborhood and park impacts: The Second Bascule Bridge causes irreparable harm to the Montlake neighborhood, its Olmsted legacy (which includes Montlake Blvd.) and other historic resources, and has impacts to the UW campus without attendant benefits.

C-032-025

Roanoke Park lid

BetterBridge.org supports the configuration for the Roanoke lid proposed by the SR 520 Local Impact Committee (LIC), including the concept of a bicycle trail link from 10th to Broadway Ave E. on the south side of SR 520 right of way.

C-032-026

Microsoft/Overlake transit access

Although it is outside the geographic scope of this project, the Overlake transit station serving Microsoft and other nearby employers is very important to many users of this corridor. Today, westbound Sound Transit Regional Express buses are forced to make a 6 to 7 minute diversion to serve the transit station. Microsoft plans to add approximately 12,000 employees in Redmond and the overall employment of Redmond is projected to grow from approximately 80,000 today to over 100,000 within the planning horizon of this project. Something needs to be done to optimize bus service to Overlake, perhaps either with an in-line transit stop or direct access ramps serving the Overlake transit station.

C-032-027

Height and Design of Union Bay Bridge

The navigational clearance of the Union Bay Bridge should be lowered from 110 feet to 70 feet. This would reduce noise and visual impacts, improve traffic operations, improve the operation of buses full of passengers, and provide an easier grade for bicyclists. BetterBridge.org encourages the Project to analyze a Union Bay Bridge with 70 foot clearance in the FEIS and to work with the Coast Guard to permit this.

All parts of this corridor should be given careful design consideration, but the Union Bay Bridge will be a new Seattle landmark and deserves the highest standard of aesthetic design. Private funding should be sought to supplement public funding in order to achieve the highest possible aesthetic standard for this bridge.

C-032-028

Noise walls and quiet pavement

Given the proximity of this highway to parks and historic neighborhoods, and the limitations of noise walls given the topography in the corridor, and the visual impacts of noise walls, we strongly encourage the Project to research and pursue quiet pavement technology in this corridor, even if it is more expensive to construct and/or maintain.

C-032-029

Noise walls should be designed to strongly discourage graffiti, and to make it easy to remove graffiti should it occur. We are intrigued by the possibility of translucent and/or curved noise walls and encourage the Project to research these and examine costs and impacts thereof.

C-032-030

Construction Impacts

We are concerned over the potentially 5 year closure of the Lake Washington Blvd. access ramps. Even if a way is found to reduce the closure period, this seems likely to have a profoundly negative impact on traffic congestion at the Montlake Interchange. We encourage the Project to come up with a plan to make the best of this unavoidable situation. Early tolling could be part of this plan.

Thank you for your careful attention to this important matter.

Jonathan Dubman and Rob Wilkinson, on behalf of the Directors and Board Members of BetterBridge.org:

Kate Battuello

Mabry DeBuys

Jonathan Dubman

Bob Mahon

Robert Rosencrantz

Ken Schubert, III

Peter Stoner

Rob Wilkinson

Millennium Park Bike Storage and Locker Facility, Chicago Illinois.
(Photo courtesy Art on File, Inc.)



From: [David Hiller](#)
To: [SR 520 DEIS Comments;](#)
CC:
Subject: WSDOT SR 520 Project
Date: Tuesday, October 31, 2006 6:04:25 PM
Attachments:

Paul Kruger
Environmental Manager
WSDOT SR 520 Project
Via e-mail at: sr520deiscomments@wsdot.wa.gov

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

We offer these numbered comments for the record on the subject DEIS,
published July 2006.

C-033-001

The project's main bridge pedestrian-bike facility should be carried west across Portage Bay to extend to a western terminus at Roanoke Ave vicinity 10th Ave E.

C-033-002

The new cross-lake bike/ped facility should be connected both south of SR520 to Madison Park, and east to the existing SR-520 trail. This will allow nonmotorized travel between north and south Seattle and allowing much better connections across the lake to major employment, retail and residential centers. The 43rd and 37th Ave. routes for this bike-ped connection must both continue to be studied in the final EIS, and other routes should also be explored.

C-033-003

We recommend the adoption of an alternative to the Pacific Interchange that would be HOV and transit only - reducing its footprint, impacts and cost. Further, we recommend the closure of the Montlake on and off ramps, thereby reducing the footprint of the Portage Bay bridge significantly and discouraging short to medium distance SOV trips.

C-033-003

With our recommendation of a modified transit, HOV only Pacific Interchange, bicycle flow through the Pacific/Montlake intersection should also be provided with grade separation along with the proposed grade separation for the pedestrian crossings for this location. (Exhibit ES-12a, Part B). This is needed to more efficiently and safely serve the major demands for bicycle movement originating both on the Eastside and south of Montlake and the Arboretum along Lake Washington Blvd – to and from the U.W campus and points north of the campus as well as the Burke-Gilman Trail corridor.

C-033-004

The north side option for the project's bike/ped trail should be adopted for the Eastside project segment, thus eliminating two sharp cross-overs in the trail to/from the south-side alignment alternative (at the Medina shore area and vicinity 96th Ave NE.) thereby improving the ease and clarity of use and signing for cross-lake bicycle traffic. This bicycle demand is expected to grow considerably when the project is completed owing to the current capacity constraint and inconvenience associated with the bike-on-transit bus service.

C-033-005

Any alternative should aggressively maximize the use of transit, active traffic management, congestion pricing and Transportation Demand Management to move people through the 520 corridor.

C-033-006

WSDOT should provide supplemental information on the 4-lane alternative that includes the provision of transit and HOV lanes on local arterials, a corridor design that maximizes transit use, and the effects of new regional transit and light rail investments.
For study purposes, HOV and transit lanes should be immediately converted from general purpose lanes on the existing bridge; the draft EIS fails to study converting any of the existing four lanes to HOV or transit-only, whether at rush-hour or around the clock. WSDOT should consider peak-period SOV bans on a proposed 4-lane reconstruction to improve transit service on a lower-cost alternative.

C-033-007

The 520 replacement should be built to accommodate future high capacity

C-033-007 | transit: Pontoons should be constructed to accommodate possible future light rail connections. Height/grade of the 520 facility should accommodate possible future light rail connections. The 520 facility should be built to accommodate possible future light rail into the proposed four or six lane footprint

C-033-008 | A 520 Corridor Transportation Demand Management Agreement should be developed with the adjacent 520 cities and major employers to work together to decrease SOV use in the corridor. A four-lane option with congestion-pricing should be studied.

WSDOT should provide supplemental information on another 4-lane option that includes a “congestion-pricing” toll that ensures free flow at rush hour for a four-lane option, to provide incentives to reduce SOV use and increase the use Transit/HOVs. We urge studying tolling on the I-90 bridge to reduce diversion of SR 520 users to another close-by Cross-Lake facility as well as the effect of system-wide tolling on 520 Bridge throughput.

C-033-009 | We propose the plans be subjected to a Health Impact Assessment. Health impact assessment (HIA) is commonly defined as “a combination of procedures, methods, and tools by which a policy, program, or project may be judged as to its potential effects on the health of a population, and the distribution of those effects within the population”

C-033-010 | Lid options should be studied and presented to the community for all alternatives.

C-033-011 | WSDOT should select the alternative that most supports good land-use: The SR520 Bridge replacement project is an excellent opportunity to meet the goals of the Growth Management Act, and selection of the preferred alternative should consider potential impacts and benefits to land use and future development.

C-033-012 | Reductions in global warming emissions: Climate change is no longer the subject of debate: rather, it is our most urgent environmental and social challenge. In our region, transportation is the single greatest source of global

C-033-012 | warming emissions. Supplemental information should be provided to show how we can achieve a net reduction in global warming emissions for each alternative over a 2006 baseline.

C-033-013 | The footprint of each of the six-lane options should be reduced. Options should be looked at to drastically limit the existing footprint including:

* Two-lane, bus and HOV-only Pacific interchange. We acknowledge that this severely limits SOV access to the UW but the environmental and aesthetic benefits outweigh this concern. This supports UW's neighborhood commitment to grow without increasing SOV trips.

* Reducing shoulder widths and lane widths. WSDOT should consider reducing design speed and vehicle speed on the bridge to ensure safety on narrower lanes as well as maximizing throughput.

* As mentioned in the above mobility section, possible future light rail should be accommodated in the proposed four-lane or six-lane footprint.

C-033-014 | The region should contribute significantly to financing the 520 project through the Regional Transportation Investment District within its current taxing authority.

C-033-015 | Tolls, specifically congestion pricing, should be imposed now to start generating revenue for the project. The EIS fails to consider a rush-hour toll level that would keep the four-lane alternative free-flowing at rush hour. Tolling should extend to I-90 at equal levels to discourage SOV commuting.

Thank you for your time and attention to our comments,

David Hiller
Advocacy Director

"Creating a Better Community Through Bicycling"

Cascade Bicycle Club
PO Box 15165

7400 Sand Point Way NE
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From: [Chris Leman](#)
To: [SR 520 DEIS Comments;](#)
CC:
Subject: Eastlake Community Council comments on the draft SR520 EIS
Date: Tuesday, October 31, 2006 11:39:47 PM
Attachments:

Dear Mr. Krueger:

C-034-001 | In addition to our previous comments, the Eastlake Community Council offers the following regarding the SR520 draft EIS. The EIS has made a serious error in largely omitting analysis of the impacts of SR520 expansion on Seattle's Eastlake neighborhood. Eastlake's SR520-related impacts from noise, impairment of the landmark Seward School, air pollution, long-term traffic, and construction traffic are all virtually ignored.

The Eastlake neighborhood is located along the west edge of I-5 and is centered on the portion of I-5 that gives and receives SR520 traffic via various ramps, including flyover ramps which are as little as 100 feet from our streets and buildings, and which currently broadcast noise, vibration, dust, and air pollution into our neighborhood--all impacts that will increase as these ramps are expanded in the various alternatives.

The Eastlake neighborhood is one of the state's densest neighborhoods, and it also has the state's best balance of jobs and residents, with equal numbers of each. Since its founding in 1971, the Eastlake Community Council has closely followed discussions about SR520, and has had representatives on a series of governmental committees that have examined the SR520 project. This neighborhood deserves more equitable treatment from the EIS, which largely ignores its SR520 impacts.

C-034-002 | The entire technical report on noise is seriously deficient in failing to address noise impacts on the Eastlake neighborhood. In important instances, noise analysis areas were not included in the Eastlake neighborhood, and they should be. SR520 expansion will cause increases in noise in this neighborhood, but these impacts are not modeled or even mentioned.

C-034-003 | Emblematic of this neighborhood's neglect in the EIS is that the "valuable historic

C-034-003 | resources" listed entirely ignore Seward School, the City's oldest continuously operated school, and which is on the National Register of Historic Places, and also has been designated as a Seattle landmark under the City's landmarks ordinance. Seward School is located very close to SR520 traffic that emerges from the flyover ramps that move traffic between SR520 and I-5. Seward School already has serious visual, noise, vibration, and pollution impacts from SR520 that would be worsened by all of the proposed alternatives, but less so by the four-lane alternative.

C-034-004 | The EIS analysis of construction traffic impacts is also particularly neglectful of impacts on the Eastlake neighborhood. Boylston Avenue East, Lynn Street, and Eastlake Avenue are already severely hurt by southbound traffic on its way to the I-5 on-ramp at Newton. It seems likely that a large proportion of the southbound truck traffic will access I-5 at this ramp. The EIS fails to provide any serious data or analysis regarding the magnitude of this truck traffic and its impacts on streets, residences, and businesses that already face unacceptable impacts. These impacts bear particularly on the choice between the four and six lane alternatives, but the EIS fails to provide any quantitative data or analysis of their meaning for our neighborhood

C-034-005 | We urge that the EIS data and analysis be redone, if necessary via a supplemental EIS, so that the Eastlake neighborhood's impacts from SR520 expansion are fairly and fully assessed.

Sincerely,

Chris Leman, Secretary
Eastlake Community Council
117 E. Louisa St. #1
Seattle, WA 98102
(206) 322-5463

From: [Steve Broback](#)
To: SR520DEIScomments@wsdot.wa.gov;
CC:
Subject: ECRD SR-520 Draft EIS Comments
Date: Tuesday, October 31, 2006 4:29:51 PM
Attachments:

ECRD, an eastside Lake Washington Citizen's Group concerned with maintaining and enhancing the livability of our neighborhoods. Our members represent neighborhoods ranging from South Bellevue to Woodinville. We have attended several SR-520 public meetings and has reviewed the draft EIS for the SR-520 bridge replacement and HOV project. We offer the following comments.

c-035-001 | ECRD strongly supports the four lane rebuild alternative. It improves safety, provides improvements to the environment, e.g. storm water runoff treatment, and is affordable. We strongly oppose the massive six lane Pacific Street interchange alternative. It would cause widespread environmental devastation to Lake Washington, arboretum, wetlands, neighborhoods, and protected species habitats. It would also cost an exorbitant 4.38 billion dollars, twice the estimated cost of the four lane rebuild.

c-035-002 | We have reviewed the OTAK 10/17/06 tech memo to the University of Washington which asserts, "Several important analyses of environmental effects are either not performed, performed using questionable assumptions or inappropriate analysis." This report raises serious concerns about the validity of the WSDOT SR-520 DEIS supporting documents.

c-035-003 | We also believe that the WSDOT must seriously study the "tube tunnel" concept, which is not now included in the SR-520 alternatives.

c-035-004 | Traffic congestion relief claims, especially for the six lane alternative, are not believable. The assumptions regarding the significant numbers of drivers who will leave their cars in favor of transit are unrealistically optimistic.

c-035-005 | We believe the WSDOT must include the cost of quiet pavement deployment in

c-035-005 | all alternatives that affect neighborhoods. State legislators have indicated they want to see this type of noise mitigation put in place to alleviate neighborhood noise concerns.

c-035-006 | Seismic hazards are not well-defined. The OTAK report, concludes "there is no thorough analysis of potential risks associated with geologic hazards, such as earthquakes, and how they would influence the proposed roadway in its various potential forms." We are concerned that no reference is made in the DEIS to the 2005 Cascadia region earthquake work group report.

c-035-007 | Throughout this process, we have been disappointed that no scenario for rebuilding of the current bridge structure has been included. The inclusion of a "do nothing" alternative while ignoring a "rebuild existing structure" alternative seems disingenuous to us. Noted highway engineers have assured us that floating in a new span and replacing the hollow-core pilings is a reasonable, phasable, and inexpensive alternative.

c-035-008 | Total financing required to fund all alternatives are not adequately discussed. Considering that major personal privacy concerns exist with electronic bill collection, the assumption that tolls will be embraced is not realistic.

c-035-010 | The WSDOT has proposed stormwater treatment facilities/cells to replace wetlands. We understand these cells are an experimental design that may not have been proven to effectively treat polluted stormwater run-off. In addition, these cells (even if effective) are no panacea. To quote OTAK once more: "some pollutant levels under the proposed alternatives will actually be higher than the levels monitored in today's runoff."

c-035-011 | We believe WSDOT should study/adopt the contents/approach of the SR-520 project corridor and status handbook dated 08/30/06, which emphasizes neighborhoods and context sensitive solutions (CSS) for the project design. WSDOT should proceed with LEED principles for application to the SR-520 project.

Thank you for your consideration,

Steve Broback
ECRD

From: [Jim Horn](#)
To: [SR 520 DEIS Comments](#);
CC:
Subject: Comments on the SR 520 Bridge Replacement DEIS
Date: Tuesday, October 31, 2006 3:59:50 PM
Attachments: [Krueger ltr re SR-520 DEIS.pdf](#)

Mr. Krueger;

c-036-001

Please accept our comments from the Eastside Transportation Association on the subject DEIS documents. Our members are very concerned that the DEIS evaluate all feasible solutions to our cross-lake transportation problems and not exclude, for political reasons, options that offer congestion relief, more throughput, and reduced tolls.

Sincerely,



Jim Horn
Chairman
Eastside Transportation Association

*** eSafe2 scanned this email and found no malicious content ***
*** IMPORTANT: Do not open attachments from unrecognized senders ***

Eastside Transportation Association

"Dedicated to improving our quality of life and environment by reducing congestion through increased mobility"

P.O. Box 50621
Bellevue, WA 98015

October 31, 2006

Paul Krueger
Environmental Manager

Re: Comments on the SR-520 Bridge Replacement DEIS

Dear Mr Krueger:

c-036-002 | The WSDOT SR-520 Bridge Replacement Draft EIS summarizes results of the 8 years of the corridor planning process thus far. Page ES1-2 states that: *"The ... Project is one of the region's highest transportation priorities. Transportation congestion needs to be addressed and traffic safety and reliability improved."* Unfortunately *congestion relief* was a critical element that has been largely ignored.

During the PM peak period, the "Montlake Mess" has traffic backed up from the SR-520 eastbound on-ramp to as far back as Sand Point Way, and from the Lake Washington Blvd eastbound on-ramp halfway back through the Arboretum. Westbound backups on the Eastside typically extend to Bellevue Way and often all the way to I-405 and beyond. The DEIS does not describe these intolerable existing traffic congestion conditions, nor do its alternatives address any congestion relief for these existing conditions.

The only action proposed for non-HOV congestion relief will be the imposition of tolls in the hopes that tolls will drive some of the excess non-HOV and commercial/ freight vehicle traffic away from the corridor. The 6-lane alternative that adds a transit/HOV lane in each direction would provide minimal relief for non-HOV drivers (one and two-occupant vehicles) and commercial freight traffic using the corridor whose diverse travel patterns do not have reasonable transit or higher-occupancy HOV options.

The Bridge Bottleneck

c-036-003 | The totally unaddressed issue for the SR-520 corridor is that over one-third of the trans-lake bridge traffic enters and exits mid-corridor between Montlake and Bellevue Way – and that occurs even though those ramps are heavily metered during peak periods. That means that a proper balance for corridor traffic demand would require an additional GP traffic lane each way between Montlake and Bellevue Way. With an added eastbound GP lane east of Montlake, the Montlake and Lake Washington Blvd ramp meters could be greatly relaxed or even eliminated.

Not only would that relieve the Montlake Mess and Arboretum backups, but it would shift even more eastbound traffic between northeast Seattle and the Eastside from I-5 to the preferred local access routes via Montlake. This shift is even better accommodated by the new "Pacific Interchange" subalternative with a new crossing of Portage Bay to relieve the Montlake Bridge – an option that we believe is supported by the Montlake Community.



C-036-004

“What happened to the 8-Lane Alternative?”

The WSDOT project team studied the 8-lane alternative. Its models found that when the bridge bottleneck was relieved by the addition of two GP lanes on the bridge, bridge traffic to/from I-5 was reduced – not increased. Up to 45% of the bridge traffic to and from Seattle have origins and destinations east of I-5. The percentage of bridge traffic to/from Montlake Blvd increased from 25% to 35%, and bridge traffic to and from I-5 decreased to 55%.

However, the reduction of bridge traffic on I-5 and the Portage Bay Viaduct allowed the model to more than offset the bridge traffic reductions with even greater traffic increases from northeast Seattle. Traffic accessing I-5 at its NE 45th/50th ramps merely shifted to Montlake and the Portage Bay Viaduct for a short hop to I-5 via SR-520 and the new metered westbound on-ramp from Montlake. Under strong pressure from the City of Seattle to exclude any GP capacity expansion of SR-520, the study team has erroneously reported the traffic increase on the SR-520 approach to I-5 a result of the added GP capacity on the SR-520 bridge. It used this interpretation to maintain its prior decision to exclude an 8-lane alternative from further consideration.

C-036-005

A 6/8-lane Hybrid Alternative

The ETA has proposed consideration of what we call a 6/8-lane Hybrid alternative. It strongly endorses the 6-lane Alternative from Foster Island through Montlake to I-5. It further strongly endorses the relocation of the Montlake Interchange to the new “Pacific Interchange” with a new overcrossing of the waterway to relieve the Montlake Bridge and the Montlake Community of SR-520 bridge traffic. We further propose metering of the westbound on-ramp from Montlake (or from the new interchange) to prevent more northeast Seattle traffic from overloading the I-5/SR-520 interchange. This would eliminate the condition that the project team has used as the reason to eliminate the 8-lane Alternative from further consideration.

Our proposal then focuses on relief of the existing bridge bottleneck condition that is unevaluated in the DEIS. From 35 to 45% of the bridge traffic desires to enter the corridor eastbound via the heavily metered Montlake and Lake Washington Blvd on-ramps, but with no added capacity on the bridge to absorb this major traffic inflow. To relieve the so-caused eastbound bottleneck, we propose addition of a third eastbound GP lane that would run from the Montlake (or new Pacific Interchange) on-ramp to 108th Avenue NE where it would interface with the four existing eastbound lanes on SR-520. This added GP lane would significantly reduce the Montlake Mess and traffic backups through the Arboretum (not addressed by the study team).

C-036-005

In the westbound direction, only 65% of the bridge traffic comes from the east of Bellevue Way via two GP lanes and the limited HOV lane. The other 35% of the bridge traffic that enters from the Bellevue Way and 84th Ave NE on-ramps must merge into these same lanes, causing the westbound corridor traffic backups often into Redmond. To relieve this westbound bridge bottleneck condition, we propose addition of a third westbound GP auxiliary lane from the four lanes east of 108th Avenue NE to the Montlake or Pacific Interchange off-ramp.

In summary, our 6/8-lane Hybrid alternative in conjunction with the new Pacific Interchange option would not only reduce bridge traffic impacts on I-5 compared to the No Build, 4-Lane and 6-Lane alternatives, it would also address and largely mitigate the existing bridge bottleneck condition of the corridor that has been unaddressed by the study team and its DEIS documents.

The 6/8-lane Hybrid would add little cost to the SR-520 Bridge Replacement project. The 6-lane Alternative would already require a complete rebuild of SR-520 and all of its over/under crossings from I-5 to I-405. The bridge pontoons are being planned for maximum width that could accommodate four lanes in each direction. The 6/8-lane Hybrid would require no further widening west of the new Pacific Interchange, and only an additional 24 feet of roadway width over water and thru the Points communities on the Eastside to 108th Avenue NE where SR-520 already has three to four GP lanes in each direction. The increased throughput more than offset the additional costs resulting in a lower toll of \$.75 per trip.

C-036-006

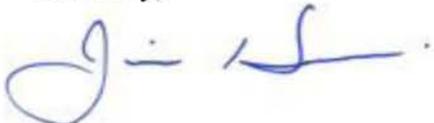
The primary corridor problem now and in the future is constraints to traffic flow out of Seattle in the morning and its return in the afternoon. When the bridge bottleneck causes westbound traffic backups beyond I-405 in the afternoon, it causes total breakdown of a large proportion of our Eastside street and highway system. This will become a normal daily occurrence in the future under the 4 and 6-Lane Alts.

We believe it will be embarrassing to the WSDOT if we spend \$3 billion on a total corridor rebuild between I-5 and I-405 yet provide no congestion relief for non-HOVs and freight traffic. It will add insult to injury for those same unbenefitted bridge users if they are to be charged tolls with no congestion relief. Tolls would likely cause some traffic diversion from the SR-520 lake crossing; but to where would that traffic divert? At the same time that WSDOT is proposing no congestion relief for SR-520, Sound Transit is trying to eliminate traffic use of the I-90 center roadway to allow its exclusive use by rail transit.

C-036-007

We respectfully request full consideration of our 6/8-lane Hybrid alternative in the FEIS and full disclosure of the bridge bottleneck that has been ignored in the presentation and evaluation of the 4 and 6-Lane Alternatives.

Sincerely,



Jim Horn, Chairman
Eastside Transportation Association