

**University of Washington**  
**Comments on the SR 520 Bridge Replacement and HOV Project**  
**Draft Environmental Impact Statement**  
**October 30, 2006**

**I. GENERAL COMMENTS**

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**Use of University Lands**

Pursuant to legislative direction, the State of Washington conveyed “unto the State of Washington for the use and benefit of the University of Washington” Lots 1 through 6 of Section 16 upon which the Seattle Campus of the University of Washington was built. The language “for the use and benefit of the University” was a condition of the deeds from the city founders and their heirs that allowed the movement of the University from the downtown campus to its present location. Those earliest supporters of the State and the University were prescient of the pressures of urban development on the property set aside for the University. The intent of the donors and their heirs was that the current University location be used "exclusively for educational purposes."

Certain shorelands within Section 16 were separately conveyed to the University of Washington. The University owns portions of the State Arboretum Park and co-manages it with the City of Seattle.

Under state law, the Board of Regents has “full control” of University property “except as otherwise provided by law.” RCW 28B.20.130(1). University regulations reserve University property, including all grounds, parking lots, water fronts, and airspace owned or operated by the University, primarily for educational use. WAC 478-136-012(1). “Educational use” includes instruction, research, public assembly, student activities, and recreational activities related to educational use. WAC 478-136-010.

The Board of Regents of the University of Washington has been given complete discretion over the use of the property of the University and they may make such use of the property as in their discretion will promote the best interest of the University. 1959-1960 Op. Attorney Gen. Wash. No 75.

Consistent with its agreement with and the intent of the founding families of Seattle, the Legislature has dictated that the University campus is to be used for university purposes. Just as the Regents have broad discretion to determine that an activity is for university purposes, they also have great discretion to determine that a use is not compatible with university purposes. WSDOT will need to work with the Regents to determine whether options under consideration for replacement of SR 520 are an appropriate use of campus lands.

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## **SEPA/NEPA Issues**

The DEIS does not detail mitigation for any of the identified impacts. Mitigation is the avoidance, minimization, rectification, compensation, reduction, or elimination of adverse impacts to the built and natural environment. Mitigation may also involve monitoring and a contingency plan for correcting problems if they occur or the mitigation is not adequate. Mitigation is defined as avoiding (by not acting), minimizing (by limiting the action), using appropriate technology, rectifying (repairing the damage), reducing (over time), eliminating, compensating (by replacing, enhancing or providing substitute resources or environments), or monitoring (and taking corrective actions) environmental impacts. The EIS should identify possible mitigation measures that will or may be applied or implemented as part of the project. The discussion should include information on the intended environmental benefit of the proposed mitigation as it related to the identified impact. If the technical feasibility or economic practicality is uncertain, the mitigation measure may be discussed, but discussion of the uncertainties must be included. The EIS should also clearly identify the mitigation measures as either mandatory or as potential so reviewers may better assess the impacts of the proposal.

SEPA rules state that the beneficial aspects of a proposal shall not be used to balance adverse impacts in determining significance.

An EIS provides decision-makers and the public with a complete and impartial discussion of the proposed project, existing conditions, probable significant adverse environmental impacts, and reasonable alternatives and mitigation measures that would avoid or minimize adverse impacts. This provides information needed for informed decisions. A critical defect in the DEIS is its relationship and inclusion of information from the Technical Appendix. The Technical Appendix contains information which is critical for decision makers yet is either not mentioned in the DEIS or is misconstrued. Certainly we all understand that most decision makers do not have the time to read both the DEIS and the Technical Appendix. Therefore the DEIS must include an adequate summary of adverse environmental impacts for each element of the environment discussed in the document. This discussion must include the disclosed impact, potential mitigation if there is any, and its feasibility. Each element of the environment must include a discussion of impacts which may or cannot be mitigated.

The primary purpose of an EIS is to provide an impartial discussion of significant environmental impacts, and reasonable alternatives and mitigation measures that avoid or minimize adverse environmental impacts. The discussion of impacts should include direct, indirect and cumulative impacts. The SEPA Handbook gives examples of these types of impacts. For example a road may be constructed which impacts a wetland (a direct impact). The new road will encourage increased development and traffic in the area because of the improved access (an indirect impact). Increase runoff and contaminants from the development would be added to the volumes and levels of contamination from similar developments surrounding the wetland (cumulative impacts). The document does not clearly distinguish project impacts as direct, indirect or cumulative. A detailed chart should be developed which identifies each impact, whether the impact is direct, indirect or cumulative, and mitigation which is practical, feasible and within control of WSDOT.

Mitigation must be reasonable and capable of being accomplished. WSDOT does not clearly state what mitigation is within the department's control and what mitigation would be the responsibility of other agencies or beyond the scope of this project or WSDOT.

WAC 197-11-440 (8) discusses optional elements of the environment to be analyzed in an EIS. One example is a cost/benefit analysis. This type of analysis is critical to help evaluate the proposal. This same type of analysis should be done for mitigation to ensure that decision-makers can determine the practicality and feasibility of the mitigation.

The document does not discuss any of the impacts from the Graving Dock. Specifically what are the impacts, both temporary and long term, of moving the pontoons into Lake Washington? Will there be an economic impact to the Locks i.e. will businesses which rely on this facility be adversely impacted? What will be the impact on the boating community? How will this impact fish?

During construction WSDOT will implement a travel demand management program. This program will help reduce impacts during construction. Why will this program be discontinued once the proposal is completed? Isn't in the best interest of the region to continue to implement travel demand management? If the travel demand management is effective during construction, will it have a similar advantage of reducing trips and therefore reducing the need for the six lane option? Why wouldn't the travel demand management program reduce the size of the project?

The impact of the Pacific Street Interchange on the health and vitality of the academic, business and residential community at the University of Washington and in surrounding neighborhoods has not been adequately addressed. Some analysis should be conducted on moving the interchange away from Foster and Marsh Islands, an environmentally sensitive area.

The entire proposal promotes the use of SOV due to an increase in road capacity on the new bridge, the expanded intersections at Montlake and Pacific, and two new lanes along Montlake. This impact, both in the short and long term, is not adequately addresses.

WSDOT has not provided an archeological study of Foster Island. This survey should be completed now, prior to further planning for the project. This is especially important to avoid similar negative financial impacts to the citizens of the State associated with the Port Angeles Graving Dock Project.

WSDOT has stated in the past that placing the bridge over Foster Island will result in fewer impacts to fish because less time will be spent in the water during construction. However, this statement is not based on documentation in the DEIS. More analysis is required to determine the validity of the statement.

Construction impacts from the temporary detour bridge have not been adequately analyzed in the DEIS as required by SEPA/NEPA guidelines.

Without a detailed analysis of mitigation, its feasibility and practicality, decision-makers will have a difficult time making informed decisions on this project. The University has identified mitigation which should be included in the Final EIS. Measures include:

- 1) Additional parking for both ICA and UWMC.
- 2) Police to manage traffic for football and other events during construction.
- 3) Costs will increase during game day as people choose to ride Metro rather than drive.
- 4) Parking revenue to the University will be significantly reduced during game days and potentially overall depending on parking mitigation.
- 5) Many units impacted by the Pacific Street Interchange are self sustaining. These include the Waterfront Activities Center, Intercollegiate Athletics, UW Medical Center, UW Physicians and others. Mitigation for business losses by these units must be included in the FEIS.
- 6) Patients coming to the UW Medical Center and UW Physicians should have access to improved valet parking. This mitigation should be included in the FEIS.
- 7) The UW's Transportation Management Plan may be adversely impacted due to the increased access to campus by SOVs via the Pacific Interchange. This will result in significant costs increases and potentially jeopardize continued growth on campus. How will this be mitigated?

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### **Campus Master Plan and Design**

The proposed Portage Bay Bridge alternative will have a significant impact on the University's south east campus and the stadium, limiting access to the site, disrupting parking and for the most part eliminating the opportunity for any future development in this area of campus. While the University's Campus Master Plan does not identify this as a development site, studies of future development potential were undertaken and show that this area has significant development potential. The loss of future developable space will need to be addressed by mitigation.

The visual impact as well as noise and light impacts will significantly impact the historic Canoe House and the Waterfront Activities Center. The Waterfront Activities Center is used by University students and a significant number of community members. This is a unique, one of a kind, resource for the community. The scale and height of the proposed structure will be an intrusion and destroy the serene, tranquil, open and magnificent natural beauty of the area.

The Waterfront Activities Center (WAC) provides water-related recreation to faculty, staff, students and the general public. It is open 337 days a year including holidays and weekends. More than 220,000 people visit this facility each year; 35% of those are the general public. The WAC rents 15,000-20,000 boats each year. The WAC lounge is used 300-340 times per year, with more than 250 requests for use denied due to lack of availability. When the WAC was constructed, the City required it to provide public canoe access to the Arboretum. If public access to this facility is limited by construction or long-term design, how will this access be

provided? Access to the WAC must be maintained throughout construction of 520 and impacts to the facility, including business loss, must be mitigated.

The widening of Montlake will have a significant negative impact in the vicinity of the stadium, the future Sound Transit Station, Edmondson Pavilion, and the Intramural facility with respect to access by pedestrians (especially for events), vehicles and bicyclists. Additionally, above grade crossings will be required from the central campus to these facilities as mitigation. The proximity of the expanded roadway to these activities and buildings and the loss of open space in this area will be significant. Adequate mitigation should be included in the FEIS to determine its feasibility and practicality.

The proposed lowering of Montlake and Pacific Street intersection and inclusion of above grade pedestrian and bicycle crossings must be studied in depth before an analysis of environmental impacts can be provided. Safe and convenient pedestrian access must be provided not only for the University but for all the users of the Sound Transit Station. The lid **MUST NOT** intrude on the view north and south and the view provided by Rainier Vista. The Vista is a unique and valued element of campus.

Open plazas, such as the one over the Montlake/Pacific Intersection, do not always solve pedestrian and bicycle access issues. Without proper analysis and design they can be desolate areas which detract from the environment and therefore are not used or enjoyed by the public. The DEIS talks about a lid but provides no information on its parameters, constraints or opportunities. Most importantly it is not adequately analyzed as a mitigating measure and therefore it is impossible to determine if the impact of the major intersection is actually mitigated. How feasible is this mitigation in terms of engineering and cost? Without adequate analysis it is not known if the mitigation is practical or feasible and therefore the impact is unmitigated.

The DEIS does not discuss the Design Advisory Group and the Aesthetic Handbook that was developed. This information should be included in the EIS under aesthetics.

What is the grade of the Union Bay Bridge? Is this grade too steep for bikes, and if so, how will bicycles get to and from campus?

What steps will be taken to maintain the noise walls and eliminate graffiti? Is there a sufficient WSDOT operating budget to manage the maintenance of these walls?

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### **University of Washington Botanic Gardens/Arboretum**

The University of Washington has grave concerns about the SR 520 project alternatives with regard to their effects on adjacent roads and lands on the western shores of Lake Washington in Seattle. These alternatives will have significant impacts on the UW Botanic Gardens in the Washington Park Arboretum and its world-renowned plant and tree collection.

The form of the Arboretum was designed by the Olmsted firm at the beginning of the last century as a crucial component of their vision for the boulevard and park network for Seattle. The arboretum now forms the southern limb of UW Botanic Gardens which also includes sensitive shoreline wetlands and a nature reserve (Union Bay Natural Area), besides the Union Bay Gardens surrounding Merrill Hall (Center for Urban Horticulture) to the north of SR 520. The Arboretum alone is the largest open green space in the central metropolitan area of Seattle and provides an invaluable park experience for local people as well as visitors to the city. It has some 350,000 visitations a year.

The Arboretum is the only collection in Washington to be officially designated a State Arboretum. The tree collections are in the very top tier of North American botanic gardens and arboreta and, indeed, are of international significance, with world-class holdings of oaks, maples, hollies, and many other plant groups. Already the first two are deemed leading collections in the North American Plant Collections Consortium, a major new conservation and stewardship initiative of the American Public Gardens Association. Any development that impinges on this national treasure must be assessed with the greatest care and consideration for future generations.

In the 1960s, the northern part of the Arboretum and the Montlake neighborhood was sliced through east-west by SR 520: only after an extensive public process were plans for a further highway running north-south through the Arboretum abandoned. Proposals on the table today present an equally dismaying series of options, which, if implemented, will impact very adversely on the most ecologically sensitive parts of the Botanic Gardens, notably the wetlands lying at the heart of the Arboretum. At present, SR 520 is largely at a low level near the Arboretum: proposals include raising it to 50-70 feet above the waterline [DEIS p. 5-7], making it visible over much more of the Botanic Gardens than it is at presently.

One alternative now proposed [DEIS p. 5-27] has a 'footprint' some 400 feet wide over the western approaches to the Arboretum. One option [DEIS p. 5-32] calls for a large intersection over the wetlands and, from that, a bridge over 110 feet high leading northwards to the main campus of the University. The southern arm of what effectively would be a cross at the heart of the Botanic Gardens would funnel increased [DEIS 5-32] traffic onto the present-day northern part of the Arboretum and on to Lake Washington Boulevard, one of the Olmsteds' most important thoroughfares in Seattle, impacting on the Arboretum and its users as a whole.

Construction will take several years [DEIS p. 8-10] and involve the building of a temporary bridge on Arboretum property [p. 8-8]. No meaningful traffic plan through the Arboretum for the construction period has been presented.

Additional alternatives should be commissioned to assess the effects of such a system which would remove the concerns about the out-of-proportion scale of the proposed developments and their visual impact, the shading of the Arboretum, traffic noise, and the effects on salmon passing through waters surrounded by the Botanic Gardens. If such a scheme were acceptable after such a study, its implementation would also allow not only the Arboretum to be returned to the original Olmsted vision, but also restore tranquility to the Botanic Gardens as a whole - as well as to the adjoining neighborhoods.

Any mitigation for impacts to this area must occur within the area of the Botanic Gardens and Washington Park Arboretum.

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### **UW Medical Center and UW Physicians**

The University of Washington Medical Center (UWMC) is one of the top-ten hospitals in the nation, providing irreplaceable services to the region and state. UWMC is also a self-sustaining business unit of the University with revenues in excess of \$600M annually. It is critical that its operations be protected during construction of SR 520 and after. More than 1,400 patients are seen in UWMC clinics each day. Maintaining access for patients, staff and visitors is crucial for the success of this facility and health care of patients.

UW Physicians (UWP) is another self-sustaining unit of the University whose members are medical staff of UWMC and faculty of the University of Washington Medical School. The patients who this group cares for must have access to facilities on campus during construction and after.

WSDOT has discussed using Transit Demand Management to reduce traffic congestion in the area during construction. WSDOT should study providing permanent incentives to residents in the area to permanently reduce traffic volumes rather than just during the time period of this construction.

It was understood that WSDOT wanted UWMC's preference as to which option was more desirable when construction work required closure of NE Pacific Street east of the Emergency Department entrance to the intersection with Montlake Boulevard (for lowering of the NE Pacific Street/Montlake Boulevard intersection). If the Pacific Interchange option is selected as the preferred alternative, UWMC prefers to always leave a lane open eastbound and westbound on NE Pacific Street **AND** for construction to occur 24 hours per day, 7 days a per week.

**UWMC must keep access to its Emergency Department open at all times.**

UWMC is extremely concerned about the time period when, in order to lower the NE Pacific Street/Montlake Boulevard intersection, Montlake Boulevard (north of the Montlake Bridge) will be relocated to within 16 feet of the east wall of UWMC's Surgery Pavilion:

- What will the vibration from construction equipment and vehicles do to UWMC's ability to perform surgeries and other invasive procedures in that building?
- Can the construction work be done at night?
- Will the current landscaping, which the local community requested remain in place, be destroyed? What will be the final landscaping after the project is complete?

UWMC would like to see how travel times to its facility (as the destination) would be impacted by the Pacific Interchange option. All travel time modeling results presented thus far show only vehicles traveling through the Montlake/Pacific intersection, not to UWMC.

Construction dust is a great concern to UWMC as it is a source of infection for immunocompromised patients. UWMC is responsible for protecting these patients against dust. We must be given the opportunity to review and approve the mitigation plans for dust control. There must be protection and filtering on UWMC's air intakes and watering/cleaning of the general area to control dust.

WSDOT's work on the Pacific Interchange must be coordinated with the construction schedule for UWMC's expansion. Currently, UWMC expects to start construction during the third quarter of 2008, with a 2-year construction period.

UWMC is concerned that the construction will cause a loss in patient volume due to difficulty of access, noise and dust. WSDOT must assure UWMC's financial stability during construction period and during the period when UWMC is working to regain its lost volume. We expect WSDOT to guarantee UWMC and UWP's required operating margin during this time period.

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### **UW School of Medicine**

Two "build" alternatives and seven options were studied for replacement of SR 520. While all of these options may have impacts on the University of Washington School of Medicine, we believe the Pacific Interchange will have the greatest impacts.

Construction of the Pacific Interchange will cause vibration, dust and noise that will adversely affect the research and teaching missions of the School of Medicine. Although any construction project may create impacts, this project is of such a magnitude that adverse effects will be more pervasive, over a longer period of time and thus more harmful. Potential impacts could result in lost productivity of researchers or even loss of faculty due to the difficulty in conducting research. This research is recognized as a major economic benefit to the region. Mitigation must be provided for vibration, dust and noise impacts on this research.

**Vibration:** The DEIS does not address the impact of vibration, its existing condition or its anticipated effect in the area of concern. Much of the research that is done within the Magnusson Health Sciences Building is vibration sensitive. As pilings are pounded or trucks continuously move to and from the project site, it can be expected that the vibration will be transmitted to the building foundations. Sensitive research instruments will pick up this vibration and render the science unusable. Without analysis of this issue in a matter similar to that of noise, the report should be considered incomplete.

**Dust:** Dust generated by the construction project does not seem to be addressed in the document. It is anticipated that the HSB will require a greater amount of preventative maintenance to keep the heating, ventilating and air conditioning equipment operating effectively.

**Noise:** Noise impacts on the University are addressed in the verbiage of the document but are not graphically presented in the summary. This information should be graphically presented similarly to that of south of the Cut. Further, the University requests that noise analysis evaluate impacts from trucks and cars struggling to get up the new Union Bay Bridge and braking on the way down. This bridge may have a considerable grade and this may change the noise profile of traffic using it.

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### **UW Intercollegiate Athletics**

The document contains very little mention of the financial impacts upon Husky Stadium and the Intercollegiate Athletics Department (ICA). Construction related to SR 520 will have a significant impact upon the operating costs for ICA and possibly on its revenues.

ICA is a self-sustaining \$50M business at the UW. There is little ability to reduce the scope of the athletics department and, thus, its expenses. For example, NCAA has minimum requirements regarding sports sponsorships and scholarships that we must meet in order to remain a Division 1A institution. Construction on SR 520 may significantly add to ICA costs and reduce revenue. If football game attendance goes down, ICA may put the greater University at great risk financially. To the extent that fans believe it is too difficult to get through construction to the stadium, then the University could be left to deal with an annual deficit in athletics.

Also, there is no mention of the economic impact over a multiple year time-frame caused by construction so close to Husky Stadium and Hec Ed Pavilion. Intercollegiate Athletics annually generates \$25M-\$30M in revenue from events in Husky Stadium alone. This provides considerable support to the economy of the region, supporting hotels, restaurants, and other services. For example, ICA generates almost \$2M annually in sales and admissions tax for local government. A significant decline in attendance (spending) will have a huge multiplying impact upon the economy of this area.

Economic impacts to ICA need to be thoroughly analyzed in the Final Environmental Impact Statement.

The SR 520 corridor has been a consistent environmental fixture in Seattle for more than 40 years. The community has adapted to its existence and generations of community members, including the University of Washington population, have known no other aesthetic environment. The sensibilities of the State have matured over this time and it now advocates sustainability. To create a second freeway across one of the most iconic, scenic waterways and shoreline environments in America does not support the environmental policies advocated by State leadership. The University believes the peninsula of land on which Husky Stadium, the Waterfront Activities Center, canoe house, campus parking and community green space are located, should remain dedicated to supporting educational purposes.

A University campus—especially one as internationally renowned for its environmental beauty as the University of Washington--should be protected from new roadway intrusions. The essence of the experience related to visiting the campus in this area will be adversely changed if the Pacific Interchange option is chosen. The University is concerned about visitors to Husky Stadium and how the quality of their experience will be diminished.

The DEIS appears to have no analysis of impacts to the University’s sports programs, especially the Rowing Program. The rowing program is internationally renowned and uses the waters in Union Bay and Lake Washington for practice. Further, this area hosts the annual Windermere Cup, an event which upholds a tradition of inviting qualified international athletes to the area, including Olympians, who may not ordinarily have a chance to compete in the U.S. Indeed, for many international athletes, the Windermere Cup marks their first visit to the U.S. Invited international rowing teams have come from Australia, China, Croatia, Czech Republic, Egypt, Germany, Great Britain, Italy, Lithuania, Poland, New Zealand, and South Africa. Stanford, Northeastern, Yale, U.C.L.A., Dartmouth and Notre Dame Universities and the US Navy are just a sampling of the collegiate teams to have competed in the regatta. The FEIS needs to include analysis of how the different 520 replacement options impact the University’s rowing program and associated events. In particular, how will new bridge columns impact the use of this area by shells, create aesthetic impacts and force changes to the rowing program?



## II. COMMENTS DIRECTED TO SPECIFIC SECTIONS OF THE DEIS:

### 1. Introduction to the Project

1-2 Under “Logical Termini,” it states that the project must be useable and reasonable even if no other transportation improvements are made in the area. However, the Pacific Interchange option requires significant improvements beyond the immediate area of the project to make it function properly. Does the Pacific Interchange option require a project scope beyond the logical boundary of the bridge replacement?

1-3 Please include University of Washington under the list of communities included in the project area. The University comprises a community of some 60,000+ people who live, visit, work and learn on campus.

1-12 *6-Lane Alternative* – WSDOT is committing to build five 500-foot-long landscaped lids across SR-520 to help connect communities. WSDOT should commit in writing to a landscaped lid that connects the UW campus across the intersection of Pacific and Montlake. WSDOT consultants represented the commitment to provide a lid at this location during workshops. Lowering and lidding Pacific Place, Montlake Boulevard and Pacific Street should also be investigated.

1-13 *Montlake Interchange and Surrounding Areas* – There is no visual representation of a second Montlake Bridge solution. This is not a balanced representation, since a preferred option has not been selected.

1-13 Photos showing the Montlake Interchange are cropped in such a way as to not show the impacts on the University & Arboretum of selecting the Pacific Interchange alternative. This shows the benefits of selecting the Pacific Interchange option without showing the concurrent impacts. Please expand these pictures to show more of the Union Bay Bridge, Arboretum Interchange, and Pacific/Montlake Interchange.

1-13 Do cost estimates on this page include mitigation for impacts on the University of Washington and Arboretum? These impacts will be considerable and costs to sufficiently mitigate will be large.

1-17 *What have we learned from these outreach efforts?* – The second paragraph from the bottom of the page references neighborhoods desiring to have corridor noise mitigated, which wasn’t provided in the 1960s. The University would desire this consideration with the Pacific Interchange.

1-18 The DEIS states that “Seattle residents in some locales” have concerns about the Pacific Interchange option. In fact, many Seattle neighborhoods surrounding the SR-520 project have taken a position against this option. This statement does not necessarily reflect the sentiments of neighborhoods in the area. The University participated in multiple workshops in which grave concerns regarding the Pacific Interchange were voiced. These concerns are not shown here.

1-18 Not all groups want sound walls. There may be trade-off's that make sound walls unacceptable due to their height and visual impacts.

## **2. The Project Area: Then and Now**

2-10 Discussion of development in the Seattle area does not include any information about the University of Washington Campus. This is a historic campus, established in 1896 and pre-dates many of the buildings & neighborhoods listed in the DEIS. A more thorough discussion of its history, and the project's impact on the historical context of the campus, is required.

2-22 The views of the current bridge in the Arboretum are from nearby areas only. The bridge as it is now cannot be seen from outside the immediate area but with the proposed height being increased the impact will be greater and from more areas in the Arboretum.

2-24, sidebar: It is misleading to compare the 80,000 trips generated by the University on the 20+ roads entering and leaving the campus area with the 115,000 trips traveling on one road - SR 520. The implication is that the University generates 80,000/115,000 or 70% of the traffic on SR 520, which it does not. No analysis is shown of University related SR 520 traffic. In fact, less than 10% of the University employee and student population – less than 6,200 people live on the east side and more than half of them commute by HOV. The University's current campus population is closer to 60,000 people, not the 55,000 noted in the DEIS.

The University's Transportation Management Plan does NOT rely on SOV's. Its basic premise and success is based on the fact that the University discourages SOV's from coming to campus. The University's UPass Program is one of the most successful programs in the country. How will the proposal impact the University TMP?

2-25 *Exhibit 2-8 Neighborhoods and Community Facilities in the Seattle Project Area* – There is no representation on the map of Husky Stadium or Bank of America Arena at Hec Edmundson Pavilion, which are major community facilities with far-reaching impacts.

2-32 A summary of noise studies for the area around University of Washington should be included in this section.

2-33: Exhibit 2-12. Noise Levels in the Project Area -- If the Pacific Interchange option were to be selected, further noise study should be undertaken to evaluate the impact on various areas and types of activities on campus and its shoreline.

2-36 *What are the state, regional and local plans and policies relevant to this project?* -- The current University of Washington Master Plan for the Seattle campus identifies development in the vicinity of the Waterfront Activities Center (Expansion Site 63E). The plan requires development to be sensitive to the existing shoreline and the historic canoe house. The Pacific Interchange encroaches on a site that was not designated for development and would not meet

the criteria of being sensitive to the shoreline. It should be noted that the Campus Master Plan was adopted by the Board of Regents and the City of Seattle.

2-36 The Washington Park Arboretum Master Plan is not described correctly and descriptions are not accurate. This section needs to be made more succinct and accurate. Impacts and mitigation need to be described.

2-44, Exhibit 2-16: Basins and Streams: The University Drainage Slough is NOT Ravenna Creek as identified in the graphic. The stream shown cutting through NE 41<sup>st</sup> Street does not appear to exist.

### **3. Developing the Alternatives**

3-25, Exhibit 3-5a, page 9-4 and 9-7: The alignment of the Pacific Street Interchange as shown destroys real development potential on the University of Washington campus. Loss of this development potential will need to be addressed. If this option is pursued, the route should be shifted as far to the south as possible. The State should consider negotiations with the Corps of Engineers to utilize their property on the north side of the Montlake Cut. In addition, location of the viaduct interchange should not impact the historic Canoe House on the University's Campus.

3-27[-]3-29; 5-6[-]5-7; 5-37[-]5-40: The document does not provide enough detail to adequately analyze the impacts of a second Montlake Bridge to both the existing bridge and the residences. The drainage plans to do not contain enough detail to understand or identify impacts.

3-28 There were many concerns about the Pacific Interchange that were captured at the WSDOT/UW Workshops. The 110-foot bridge height creates a higher profile of the Pacific Interchange Bridge. The University's preference would be to see the entire Pacific Interchange covered by a lid where it reaches land to the Montlake and Pacific intersections. It may be appropriate for this lid to extend down further along Montlake Blvd, Pacific St. and Pacific Place. Among the issues we are requesting further investigation by WSDOT: how to deal with weather-related (snow) traffic jams on the steep incline of the new bridge; noise impacts on the University and surrounding areas; the risk and impact of debris from the overpass; whether this will result in degradation of the natural beauty of the site; how this will impact the pedestrian experience around the Stadium and other areas of campus; impacts from loss of University parking; impacts from loss of tailgating at UW events; how less access to the athletic campus will affect the University; whether the University will lose the opportunity to host traditional rowing (a UW strength) races due to bridge impacts; whether the Pacific Interchange will conflict with the Sound Transit station; whether this is a possibility for crime under and around the new freeway; financial impact to campus programming; sports recruiting impacts; increased filling and shading of the wetland and shoreline habitats; negative impact to wildlife species, including endangered species; impact on boaters attending football games and Boating Opening Day; whether staging buses in the depressed Montlake intersection is dangerous and disorienting to transit riders; and whether the bridge diminishes the view from Husky Stadium and from the related campus roads, paths, parking lots and shoreline zones.

Page 3-28, Paragraph 2: The description of the option is incomplete as it omits the planned widening NE Pacific Street and NE Pacific Place. The description also omits integral design features, such as raising the landscape surrounding the Pacific Street and Montlake Blvd intersection and providing a lid or facsimile above this intersection. This level of completeness is required so that this design alternative can be properly compared to the base 6 lane alternative, the description of which includes mention of lids, sound walls, reconstruction of intersections, etc.

Page 3-28, Paragraph 4: This section asserts that the Pacific Street Interchange option would “provide a more reliable transit connection to the Sound Transit University Link light rail station at Husky Stadium...” This assertion is misleading because the Pacific Interchange Option is irrelevant for light rail: the transfer between SR 520 transit and light rail would require an extraordinary 1,500 foot walk between modes that alone would preclude most transfers. Even without this distance, the trip between the east side and downtown, the dominant SR 520 trip pattern, would be less attractive and slower than the current one seat direct bus service. More analysis is required to determine if this area will become a “kiss-n-ride” area. WSDOT should detail how transportation planning is being coordinated between KC Metro, UW, Seattle and Sound Transit.

3-29 It is only in WSDOT’s opinion that the Pacific Interchange is best for the Arboretum. It actually creates a net loss of an island as the bridge will go right over it. The wording sounds as if this is okay and glosses over the fact that the loss of any Arboretum land is a loss for the community at large.

3-38 The proposed new trail in the Arboretum described on this page is a multi-use trail that is not compatible with a bike only trail. What is the impact to the Arboretum, UW and others if there is no bike access to Madison Park? What are the impacts of not providing this access?

3-39 Are the storm water treatment facilities to be fenced? If not, these would make excellent interpretive and education opportunities. Opening these facilities to the public should be considered as part of the design.

#### **4. Comparison of the Alternatives**

4-7 There is no discussion about the traffic that would impact the Arboretum via Lake Washington Blvd. Any increase in traffic whatsoever is a negative impact on the Arboretum. It is already hazardous for guests and employees to try to cross the road. Additional traffic may also create problems for bicyclists on this road. One of the main reasons for people to visit the Arboretum is for a quiet respite from the congested City. What is the impact of closing Lake Washington Blvd. to all traffic?

4-10, Sidebar: The condensation of Level of Service (LOS) A – D into the term “low to moderate” is not a standard use of LOS terminology. This use obscures the changes that the standard use, i.e., LOS A, LOS B, LOS C and LOS D reveals and therefore hides the changes from the DEIS reader.

4-10, paragraph 2: The DEIS inappropriately limits the analysis of the effect of increased local street traffic volumes associated with the Pacific Interchange. Of particular concern are: NE 45<sup>th</sup> Street and Union Bay Place NE, NE 55<sup>th</sup> Street and 25<sup>th</sup> Ave NE, NE 45<sup>th</sup> Street and 15<sup>th</sup> Ave NE, NE Northlake Way and 6<sup>th</sup> Ave NE, NE 40<sup>th</sup> Street and 7<sup>th</sup> Ave NE, NE 40<sup>th</sup> St and 6<sup>th</sup> Ave NE and NE 40<sup>th</sup> St and Latona Ave NE.

4-10, paragraph 3: The analysis asserts that it “...currently takes about 25 minutes for traffic to make the short journey southbound between 25<sup>th</sup> Ave NE and the Montlake Interchange”. This misleadingly implies that 25 minutes is the normal condition, something that was not concluded from the analysis. It may be that a set of Montlake bridge openings and SR 520 ramp metering conditions occasionally leads to extreme travel times as long as 25 minutes, but frequency is not demonstrated. Therefore the travel time benefit shown by the Pacific Interchange can only be attributed to occasional and perhaps worst case conditions.

4-12, paragraph 4: The bus stop in the U District is at the Pacific Place and Pacific Street intersection, not at the Montlake Blvd and Pacific Street intersection.

4-12, last paragraph: The assertion that “The Pacific Street Interchange option would make transit to and from SR 520 more reliable in the vicinity of the University link light rail station at Husky Stadium” is misleading and contradicts the analysis shown in the Addendum to the Transportation Technical Report dated 2/13/06. The assertion is misleading because the Pacific Interchange Option is irrelevant for light rail: the transfer between SR 520 transit and light rail would require an extraordinary 1,500 foot walk between modes that alone would preclude most transfers. Even without this distance, the trip between the east side and downtown, the dominant SR 520 trip pattern, would be an otherwise less attractive slower one than the current one-seat direct bus service. The assertion is contradicted by the Addendum to the Transportation Technical Report, pages 5-13 and 5-14, which shows that in both the AM peak hour and PM peak hour, at both the westbound and eastbound ramps, “traffic would queue back through the HOV direct access ramp intersection”.

The queuing issues described in Addendum to the Transportation Technical Report, pages 5-13 and 5-14 indicate that the “tight diamond interchange” shown on page 3-25, Exhibit 3-5a. is too closely spaced to prevent blockage of the HOV ramps. This condition leads designers to increase the space the intersections, thus increasing the visual, light and other impacts of the proposed interchange. This increase in interchange footprint is not analyzed in the DEIS.

4-16 If the existing off-ramps are removed as part of the construction, where does all of the traffic go during the time before the new off ramps are built?

4-22 There is no discussion of the impacts on recreation or education in the Arboretum under possible affects.

4-25 Under the Key Points-How is visibility improved by adding sound walls?

4-26 While WSDOT describes the increased bridge height as a positive aspect, this could actually be a negative impact on the Arboretum. First, most plants that survive in these more

shady, droughty areas are invasive in nature. Second, this creates additional work for Arboretum staff who are already overburdened. If adequate maintenance of these areas cannot be provided due to limited resources, the mitigation is not practical or feasible.

4-29, section of “Community Cohesion:” The DEIS fails to show an analysis of the affect of the Pacific Street Interchange on Community Cohesion, and specifically on the cohesion between the sectors of the University caused by additional traffic and street width on Montlake Blvd and Pacific Streets. Extensive lidding of these areas – Montlake Blvd, Pacific St. and Pacific Place- may be required to knit the campus back together.

4-30 This may increase views at the water level but a large structure will be overshadowing the whole area.

4-31 Property acquisition- does fair market value apply to the Arboretum and University?

4-32 Is construction staging talked about elsewhere in the document? If not, where will that be discussed?

4-38 Lake Washington Blvd. will be impacted. This is a historic Olmstead Boulevard. Impacts should be discussed and analyzed.

## **5. Detailed Comparison of Alternatives – Seattle**

5-3 Viewer sensitivity- The UW Botanic Garden has approximately 320,000 (250,000 in the Arboretum) visitors a year who would be impacted visually by this huge proposed bridge.

5-4 The Pacific Interchange is detrimental to the historic Canoe House. The National Register of Historic Places Inventory nomination form states that the structure was constructed by the U.S. Navy as a seaplane hanger in 1918, and the structure is significant to the state as a rare, if not unique, example of an architectural type developed in the early years of aviation. The airplane hanger was a response to new technology. Its efficient form was essentially without historical precedent. No other examples of the hanger type dating from the period of the First World War are known in Washington. No other early hangers are known to have survived in the vicinity of Seattle, which has figured prominently in aviation history since the founding of the Boeing Company in 1916.

Part of what makes this structure so significant is its location. The nomination form goes on to state that in 1917 and 1918 portions of the campus were taken over for war preparations. Army Training Corps activities were located on the upper campus. The U.S. Naval Training Camp extended along lower ground fronting Lakes Union and Washington and the Ship Canal connecting the two bodies of water. The location of the Canoe House is significant to the University of Washington, the City of Seattle, State and Nation because it is the home of rowing which started as early as 1902 and 1904. During the early years the Pocock Brothers were brought to campus to fabricate racing shells according to a revolutionary, light-weight design which contributed to the varsity crew’s success and subsequent recognition nationwide. All crew activities, including Mr. Pocock’s shell-building shop were housed in the former Naval Military

Hanger from 1922 to 1949, when activities were shifted to a new facility called the Conibear Shell House. During the years the crew team was housed in the Canoe House the varsity crews compiled a distinguished record, of which a high point was competing in the World Olympic Games of 1936. During this time in the Canoe House, George Pocock was permitted to fill orders for his superior racing shells from Harvard, Columbia, Cornell, Princeton, Syracuse and other universities around the country. The University has worked hard to maintain this critical element of history. Both the structure's use and its current location reflect on its significance. Both the structure's use and location are significant and any impact should be analyzed, disclosed and mitigated.

5-6 Visual Quality- The Pacific Interchange may reduce the width of the freeway but would add another bridge that would have profound visual impact for visitors to the UW Botanic Gardens and the Arboretum.

5-7 The visual impact of the bridge being at its highest point in the Arboretum is a definitively negative effect on the recreational and educational users of this area. This bridge will be 60 feet high at the base with an additionally higher total including sound walls. This cannot be mitigated by plants/trees. It would take 60 years to have any effect that would adequately address the issue of such a huge piece of concrete.

5-10 There is no discussion under Local Streets of the impact on Lake Washington Blvd., a one-lane road that is currently overcapacity. Any additional traffic would create negative impacts on the user experience, damage the plant collection and diminish educational use.

The Pacific Street Interchange would alleviate the traffic on Montlake Blvd. south of the cut but would increase the traffic south of the 520 onto Lake Washington Blvd.

Again, there is no detailed discussion on the impacts of traffic through the Arboretum on Lake Washington Blvd. Any increase at all is a negative for the Arboretum.

5-12, paragraph 1: The DEIS has omitted that volumes would also increase on 24<sup>th</sup> Ave E, south of Roanoke and Lake Washington Blvd in the Arboretum. What is the street capacity and impacts from increased traffic on the Montlake neighborhood?

5-12 to 5-14: The DEIS inappropriately limits the analysis of the effect of increased local street traffic volumes associated with the Pacific Interchange. Of particular concern are: NE 45<sup>th</sup> Street and Union Bay Place NE, NE 55<sup>th</sup> Street and 25<sup>th</sup> Ave NE, NE 45<sup>th</sup> Street and 15<sup>th</sup> Ave NE, NE Northlake Way and 6<sup>th</sup> Ave NE, NE 40<sup>th</sup> Street and 7<sup>th</sup> Ave NE, NE 40<sup>th</sup> St and 6<sup>th</sup> Ave NE and NE 40<sup>th</sup> St and Latona Ave NE. Analysis must be provided in the FEIS.

5-13, sidebar: The condensation of LOS A – D into the term “low to moderate” is not a standard use of LOS terminology. This use obscures the changes that the standard use, i.e., LOS A, LOS B, LOS C and LOS D reveals and therefore hides the changes from the DEIS reader. This should be corrected in the FEIS.

5-14, paragraph 3: The analysis asserts that it “...currently takes about 25 minutes for traffic to make the short journey southbound between 25<sup>th</sup> Ave NE and the Montlake Interchange”. This misleadingly implies that 25 minutes is the normal condition, something that was not concluded from the analysis. It may be that a set of Montlake bridge openings and SR 520 ramp metering conditions occasionally leads to extreme travel times as long as 25 minutes, but frequency is not demonstrated. Therefore the travel time benefit shown by the Pacific Interchange can only be attributed to occasional and perhaps worst case conditions. For decision makers to make informed decisions, a worst case scenario must be tempered with a frequency analysis.

5-16, paragraph 1: The analysis asserts that it “...bus travel times to and from eastbound SR-520 would improve by approximately 15 minutes...” This misleadingly implies that 15 minutes is the normal condition, something that was not concluded from the analysis. It may be that a set of Montlake bridge openings and SR 520 ramp metering conditions occasionally leads to extreme travel times as long as 15 minutes, but frequency of this congestion is not demonstrated in this analysis. Therefore the travel time benefit shown by the Pacific Interchange can only be attributed to occasional and perhaps worst case conditions. Further, the Addendum to the Transportation Technical Report dated 2/13/06, pages 5-13 and 5-14, shows that in both the AM peak hour and PM peak hour, at both the westbound and eastbound ramps associated with the Pacific Interchange, “traffic would queue back through the HOV direct access ramp intersection”. The affect of this queuing on travel time is not shown.

5-17, paragraph 4 says that “The Pacific Interchange option would remove an additional 250 parking spaces in the University of Washington E-11 and E-12 parking lots...” whereas page 5-17, exhibit 5-8 sets that number at 180. What is the exact number of spaces removed from these parking lots and what is the mitigation for this?

5-18 Where is the parking replacement for access to the Arboretum via MOHAI to be? This is a loss of 150 parking spaces that visitors to the Arboretum use.

5-22 Noise analysis and the impact to the UW are not adequately addressed.

5-23 There needs to be discussion about the noise impacts on the Arboretum and University during the 7-10 year construction period. The loss of recreation and education opportunities during this period must be analyzed and mitigated.

5-24, section of “Community Cohesion:” The DEIS fails to show an analysis of the affect of the Pacific Street Interchange on Community Cohesion , and specifically on the cohesion between the sectors of the University caused by additional traffic on Montlake Blvd and Pacific Streets. The University of Washington campus community is approximately 65,000 people and warrants analysis as well.

5-26 through 5-30: No analysis is offered on the effect of the Pacific Interchange option on the University’s Waterfront Activity Center, canoe house, the climbing rock nor the passive use of open space south of the E11 and E12 parking areas.

5-36 There is no discussion about the impacts on the historical aspects of Lake Washington Blvd.

## **6. Detailed Comparison of Alternatives – Lake Washington**

6-1: Views – This is an incomplete study: views from the back side of Husky Stadium are dramatically altered by the Pacific Interchange. The repeating theme of the iconic view from the UW peninsula being devastatingly negative should be shown and analyzed in the FEIS.

Page 6-4 and 6-5: How would the second Montlake Bridge (before, during and after construction) meet navigational standards? Several ships that enter Lake Washington require an air draft of at least 105 feet.

## **8. Construction Effects**

8-5 Not only is the new proposed bridge wide, up to 420 ft. in some places, but there is a temporary bridge (7-10 years) to be built during construction. This will have a significant long term effect on the Arboretum, which should be analyzed in the FEIS.

8-12 Where will the traffic go during the removal phase of the Lake Washington Blvd ramps?

8-16 The replanting of the area taken for the temporary bridge will have a tremendous effect on the Arboretum. This is a place where people seek the trees and it will take a half a century at least to recover. These impacts should be disclosed, analyzed and mitigation identified.

8-16 Construction Impacts: The dual projects of Sound Transit and the SR 520 Interchange could create operational difficulties for Intercollegiate Athletics (ICA) to the point that it could no longer operate. The financial burden of supporting ICA programs could fall to the University and the State of Washington. Thus far, ICA is a self-sustaining higher education program. The construction could be in conflict of ICA's construction at Husky Stadium, depending on timing. Construction impacts on the access to and operations of UWMC, UW Physicians and UW Medical School could also be significant. These impacts should be disclosed, analyzed and mitigation identified.

## **9. Other Considerations**

9-4 The implementation of the Washington Park Arboretum Master Plan should be included. How will this project impact the ongoing implementation of this master plan?

9-6-11: There are roughly four paragraphs dealing with the impacts of the SR 520 Pacific Interchange. Although the paragraphs are largely accurate, the University of Washington should be viewed as an equivalent neighbor to Montlake and perhaps its issues should be represented more in depth and with more clarity. Mitigation for these impacts should be identified.

## **Appendix J: Indirect and Cumulative Effects Discipline Report**

Page 37 This section mentions indirect effects but it does not define the specific indirect impacts. The reader is left with the assumption that the phrase “indirect effect” is enough to clarify the impact analysis. This is not the case. Is the indirect effect growth? Is the indirect effect more traffic? Is the indirect effect more congestion or economic development? How can the 4-Lane Alternative encourage more growth in less developed outlying areas northeast and east of Lake Washington than the 6-Lane Alternative? The 6-Lane Alternative goes exactly in the same place as the 4-Lane Alternative. While it directs growth to the highly urbanized areas of Seattle it also opens the east up to more population growth as well. This section does not consider the reverse commute (from west to east) and its impact on the growth of the region. It also states that the indirect effects on the economy which are not described are minimal and only a matter of timing. Why then does the State consider any other alternative than the 4-Lane Alternative which has fewer impacts to the Arboretum, wetlands, fish and wildlife?

## **Appendix R: Addendum to the Transportation Discipline Report**

Page 1-3, paragraph 2, states “The intent of the Pacific Street Interchange option is to reduce the traffic effects of the Montlake interchange on the surrounding neighborhood”. Instead, the Pacific Interchange shifts the effects from the northern part of the Montlake neighborhood to the Arboretum, to the University of Washington and to the residential and commercial areas north of the Ship Canal.

Page 1-5, paragraph 3, asserts that the Pacific Street Interchange option would provide “a more direct connection between buses and the proposed Sound Transit North Link Station at Husky Stadium.” This statement is misleading because the Pacific Interchange Option is irrelevant for light rail: the transfer between SR 520 transit and light rail would require an extraordinary 1,500 foot walk between modes that alone would preclude most transfers. Even without this distance, the trip between the east side and downtown, the dominate SR 520 trip pattern, would be an otherwise less attractive and slower trip than the current one-seat direct bus service.

Page 2-11, last paragraph, states that “at times, northbound and southbound traffic would queue back through the adjacent intersections.” The affect of this queuing on bus reliability and travel time should be revealed in the main body of the DEIS, particularly in sections discussing the affect on transit, for example DEIS page 4-12 last paragraph and page 5-16, first paragraph.

Page 7-1, last paragraph, states that with the Pacific Street Interchange option: “Bus travel times would likely be better than under the No Build Alternative because of the HOV direct access ramps and buses would not be delayed by draw bridge openings. This would improve the reliability between bus and light rail connections at the University of Washington Station at Husky Stadium that is planned as a part of the North Link light rail system.” The assertion is contradicted by the analysis shown on pages 5-13 and 5-14, which shows that in both the AM peak hour and PM peak hour, at both the westbound and eastbound ramps, “traffic would queue back through the HOV direct access ramp intersection.” The statement about improved reliability between bus and light rail connections at the University of Washington Station at Husky Stadium is misleading because the Pacific Interchange Option is irrelevant for light rail:

the transfer between SR 520 transit and light rail would require an extraordinary 1,500 foot walk between modes that alone would preclude most transfers. Even without this distance, the trip between the east side and downtown, the dominant SR 520 trip pattern, would be an otherwise less attractive and slower trip than the current one-seat direct bus service.

Page 7-2, first paragraph, states: “The Pacific Street Interchange option would increase capacity in the University of Washington/Montlake area. These capacity improvements would likely improve bus travel times in the area” without showing analysis to support the assertion. Most local bus service travels on NE Pacific Street to 15<sup>th</sup> Ave NE; in the PM peak period, this project will add 37% to the traffic volume on NE Pacific Street, 33% to the volume on 15<sup>th</sup> Ave NE (exhibit 3-27), will degrade the intersection of these two streets, to LOS E (Exhibit 5-4) and according to exhibit 3-20 will remove the HOV lane on EB NE Pacific Street. It is hard to imagine this additional traffic added to an already congested local street system will improve bus travel times.