October 31, 2006

Megan White, Director
WSDOT Environmental Services Office
P.O. Box 47331
Olympia, WA 98504


Dear Ms. White:

The Seattle Planning Commission appreciates the opportunity to comment on the SR 520 Bridge Replacement and HOV Project Draft Environmental Impact Statement (DEIS).

The Planning Commission is an independent citizen volunteer advisory body that provides advice and recommendations to City officials. As stewards of Seattle’s Comprehensive Plan, our comments and recommendations focus on the SR 520 project’s relationship to City planning goals, policies, and plans. The full Commission (with the exception of those who have recused due to conflicts of interest*) has reviewed specific sections of the SR 520 DEIS. The attached Comments Matrix presents our specific comments.

General Observations:
The three alternatives and their options present a range of potential solutions. We concur that the No Build Alternative would not meet the safety and transportation needs of Seattle residents; however we also believe that the other alternatives have significant disadvantages.

Both the Four-Lane and the Six-Lane Alternatives are consistent with the transportation goals outlined in Seattle’s Comprehensive Plan. Both alternatives will have greater impacts to communities and the natural environment and the sheer size and scale causes us concern. The current choice on the table appears to be a choice between transportation and transit functionality with greater impacts versus a system that would not function as well but would be slightly less adverse. We remain open to the possibility that another solution may still exist.

Based on our review we find that the Six-Lane Alternative provides increased opportunities to move people and goods, including transit mobility, in the near future. However, in terms of costs versus benefits, it remains unclear whether the Four-Lane or Six-Lane Alternative would be preferable in the long term due to a lack of clarity concerning how each would allow for the addition of high-capacity transit infrastructure. While the Pacific Interchange also provides increased opportunity for transit mobility, these benefits may be offset by potentially significant adverse impacts. Increased opportunity for both bus and high capacity transit is of enormous benefit to the region. However, we are particularly concerned about noise impacts, the health of the arboretum, the potential visual blight and unusual height of
the proposed sound walls and Pacific Interchange proposal, the increased impacts to fish and wildlife habitat, and the impacts to Seattle neighborhoods. There are significant issues that will require a great deal of thought and effort by the State if the Six-Lane Alternative becomes the preferred alternative.

Again, we appreciate the opportunity to provide our comments on this project, recognizing the magnitude of its importance to the community and region. We would be happy to meet with your staff at an upcoming Planning Commission meeting to discuss the SR 520 project and our DEIS comments.

Sincerely,

[Signature]
Jerry Finrow, Chair
Seattle Planning Commission

cc:
Secretary Doug McDonald, WSDOT
Mayor Greg Nickels
Seattle City Council
Tim Ceis, Emelie East, Nathan Torgelson, Michael Mann, Mayors Office
Michael Fong, Casey Hanewall, Council Central Staff
Phyllis Shulman, Council Staff
Grace Crunican, Bob Powers, Dave Allen, SDOT
Diane Sugimura, John Rahaim, DPD
Karen Kiest, Guillermo Romano, Layne Cubell, Seattle Design Commission

* SPC RECORD OF RECUSALS AND DISCLOSURE *

Commissioner Steve Sheehy disclosed that he works for Sound Transit, who is a co-lead on the project. Commissioner Sheehy recused himself from all Planning Commission activities and discussion on this matter.

Commissioner Kirsten Pennington disclosed that her firm CH2M Hill had a large part in writing the draft. Commissioner Pennington recused herself from all Planning Commission activities and discussion on this matter.

(Notes: Advisory board members are not required to disclose the nature of a conflict of interest that results in a recusal. Also Planning Commission policy allow Commissioners to recuse themselves even when the City's ethics policies do not dictate recusal).

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Commissioner Jerry Finrow disclosed that he is employed by the University of Washington which has a great interest in this project but that he has no financial conflict of interest thus is not required to recuse. In addition, Seattle Ethics and Elections Commission (SEEC) Director has provided Mr. Finrow with a Advisory Opinion that determined that he has no financial interest so must disclose on the record and to SEEC office but can participate in all Commission discussion and activities on this matter.

Commissioner Amalia Leighton disclosed that her sister is employed by EnviroIssues which contracts with WSDOT to assist in the 520 Public Involvement process. Commissioner Leighton has no financial conflict of interest and thus is not required to recuse.

Commissioner Kevin McDonald disclosed that he is employed by the City of Bellevue which has a great interest in this project but that he has no financial conflict of interest thus is not required to recuse.

Commissioner Hilda Blanco disclosed that she is employed by the University of Washington which has a great interest in this project but that she has no financial conflict of interest thus is not required to recuse.