

5. Revised DEIS Comments and Responses

5. Revised DEIS Comments and Responses

This section contains all comments and responses made on the Revised DEIS received by WSDOT during the comment period. The comments and responses are grouped in the following order: federal and state agencies (A), local jurisdictions and representatives (L), comment forms (C), and public hearings (CRO, CRH).

Substantive comments requiring acknowledgement or a response have a comment number in the left margin that corresponds to the response number. The responses for each comment letter immediately follow the letter. The first comment in each letter is designated as 1.

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ER-02/146

A1

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240



APR 25 2002

Mr. John White, P.E.
Project Engineer
6431 South Corson Avenue
Washington State Department
of Transportation, Mailstop 61
Seattle, Washington 98108

Dear Mr. White:

This letter provides the comments of the U.S. Department of the Interior (Department) on the Revised Draft Environmental Impact Statement (RDEIS) and Draft Section 4(f) Evaluation for the proposed SR 509 Corridor Completion/I-5/South Access Road. This project will complete a major north south corridor in a metropolitan area where the existing highway system is inadequate. The present configuration of roads, airport, and essential development and protection zones put significant constraints on locating new highways and appropriate interchanges, as do the natural features such as streams, wetlands, ravines, and the wildlife that inhabit this green space.

We believe that with sensitive project development, the essential natural and recreational values of this area can be sustained. While many environmentally sensitive design elements have already been incorporated into the planning for this project, we have serious concerns about the affected wetlands, watersheds and remaining fish and wildlife habitat in the project area; and we request that you address these concerns in the Final EIS. We would also like to see more information about mitigation measures to protect recreational values and allow the taking of parkland under Section 4(f).

GENERAL COMMENTS

In general, the RDEIS does not place enough emphasis on watershed-based approaches for mitigating stormwater impacts. The project takes place in a highly urbanized setting with a number of complex environmental and regulatory constraints. We suggest a more proactive approach in the Final EIS, to creatively manage stormwater impacts. This approach will result in an ecological benefit for the species and their habitats, and can help the project meet the complex requirements of this particular situation. Although we do not anticipate major impacts to listed species from this project, we do have serious concerns about the continued degradation of the affected wetlands, watersheds, and remaining fish and wildlife habitat in the project area.

We request that you address the following three concerns with the rest of our comments in the final EIS for the proposed SR 509/South Access Road Project: (1) Approach mitigation of stormwater impacts from a watershed level, using non-engineered solutions as a starting point; (2) Clarify the extent to which each of the "build" alternatives might negatively impact base flows for each of the affected subwatersheds in the project area; and (3) Expand the analysis of potential impacts to anadromous fish and their habitat to include each of the subwatersheds affected by the "build" alternatives, and to areas where ongoing and future mitigation efforts will allow fish access in the future.

Response A1-1

A watershed approach for mitigating stormwater impacts was implemented for the project. A stormwater value engineering (VE) study was conducted in May 2002 to address stormwater issues for the SR 509 project. Based on this study, stormwater design has been integrated with proposed improvements identified in the Des Moines Creek Basin Plan to meet the goals of the plan. WSDOT, as a recent member of the basin planning team, will participate in funding Capital Improvement Projects identified in the plan if the project EIS is approved and construction is funded. The Des Moines Creek Basin Plan would meet the following goals: reduce peak flows for the 6-month to 10-year storm events, to a level that prevents flooding and stream bank erosion; increases dissolved oxygen levels; restores riparian vegetation to lower water temperatures and improves fish habitat; provides low-flow augmentation to maintain biodiversity and improves fish habitat; and removes the fish passage barrier at Marine View Drive. Implementation of the plan would slow degradation of wetlands and affected watersheds and would improve fish and wildlife habitats in the Des Moines Creek Basin.

A1-1

Stormwater

The RDEIS discusses the best combination of conventional management practices and highly engineered facilities (i.e., large detention ponds and underground vaults) for meeting stormwater mitigation requirements. However, we suggest an approach using non-engineered solutions as a starting point that would prove more effective at restoring degraded hydrologic functions.

The RDEIS references a technical memorandum by the consulting firm CH2M Hill, entitled “Stormwater Treatment Technical Memorandum for SR 509/South Access Road” (August 2001). We were also provided with an earlier document, by the same firm entitled “SR 509 Stormwater Practicability and Environmental Decision Making, Preliminary Draft” (September 2000). This earlier document, discusses in some detail, ideas for “alternative watershed-based mitigation” drawn in part, from the 1997 Draft Des Moines Creek Basin Plan. These ideas include low flow augmentation and habitat restoration. We were disappointed to learn that the current memorandum (August 2001) does not include such emphasis on watershed-based approaches.

A1-2

The current technical memorandum (August 2001), cited in the RDEIS, states that current cost estimates for the project’s stormwater treatment measures have reached at least \$115 million. It would be helpful to see what watershed based mitigation opportunities are possible, and how those costs might compare with the cost of the proposed concepts.

We are concerned that the RDEIS lacks an evaluation for the potential of watershed based stormwater mitigation alternatives, and we request a more thorough analysis of the possibilities and benefits of such an approach in the final EIS. We encourage the project proponents to fully investigate the use of non-engineered solutions that could result in protected water quality/quantity as well as habitat enhancement and creation. Tools that could be incorporated in such an approach include:

Use of low impact development methods such as soil amendment, mulching, etc., to help absorb stormwater and increase infiltration rather than increasing the amount of stormwater discharged directly to surface waters;

Permanent removal and restoration of existing impervious surfaces in order to reduce the total impervious area in a subwatershed;

Replacement of lost stormwater storage capacity with newly created or restored floodplain storage areas;

Augmentation of instream base flows through permanent acquisition of water rights;

Locating water quality treatment structures outside of riparian, shoreline, and wetland buffer areas;

Restoration of riparian buffers; and,

Permanent acquisition of wetlands, riparian areas, and upland areas for use as infiltration reserves that improve and/or protect hydrologic functions.

A1-4

We are concerned that the RDEIS does not contain enough information or analysis on potential impacts of the “build” alternatives concerning the base flows of affected subwatersheds. The emphasis is instead focused on potential increases in runoff rates and volumes. The September 2000 Memorandum from CH2M Hill points out base flows that have been reduced 21 percent from pre-development conditions. Please clarify how each of the “build” alternatives could alter base flows in each of the affected subwatersheds, in the Final EIS.

Response A1-2

Since publication of the August 2001 stormwater technical memorandum, the baseline cost estimate for stormwater design was revised to \$102 million. The results of the watershed-based approach applied during the May 2002 stormwater VE study (see response to Comment A1-1) identified potential cost savings, as well as potential added costs. If the recommended cost savings and added costs are implemented, the revised total stormwater costs would be approximately \$63 million, compared to a baseline cost of \$102 million.

Response A1-3

The stormwater VE study conducted in May 2002 (see response to Comment A1-1) applied a watershed-based approach to stormwater mitigation and non-engineered solutions, including pollutant source control measures such as galvanized guard rails, poles, and fencing. In addition, WSDOT is a member of the Des Moines Creek Basin Plan committee and would fund some of the mitigation projects identified in the basin plan if the SR 509 project is built. These projects include low-flow augmentation, riparian habitat restoration, and maintenance and enhancement of natural flood storage.

Response A1-4

The proposed project would not reduce the base flow of Des Moines Creek. The transformation of pervious soils into impervious areas generally eliminates water infiltration into soils. Infiltration and subsequent discharge of water is one of the major components of the base flow in Des Moines Creek. As currently planned, the SR-509 project would collect stormwater runoff for every storm less than the 6-month storm event. Collected stormwater would be allowed to infiltrate via bioswales, infiltration vaults, and/or infiltration ponds wherever subsurface conditions allow. Where infiltration is not feasible, stormwater runoff would be released into stormwater treatment wetlands, or would receive enhanced treatment in most areas. If the proposed project is approved and funded, WSDOT would contribute to projects identified in the Des Moines Creek Basin Plan. These projects include a low-flow augmentation facility in the vicinity of South 200th Street, which would provide benefits to the aquatic environment during summer periods of stress caused by elevated temperatures and low flows.

Fish and Wildlife Habitat

A1-5 We understand that the project's proximity to the Seattle-Tacoma International Airport poses some significant design constraints, especially with regard to minimizing potential wildlife attractants that may pose a hazard to aircraft operation. We are concerned about the proposal to place netting over open water areas such as stormwater ponds to prevent bird use. Please include in your final EIS analysis, the potential effects that such netting may have on wildlife that is attracted to open water areas and perhaps, trapped in the netting. We encourage you to pursue other options, such as planting shrub vegetation to dissuade birds from landing on the water, instead of using potentially harmful netting.

A1-6 The project proposes to replace a culvert that is currently an anadromous fish barrier at Marine View Drive. The Marine View Drive project is a separate project that has already gone through some stages of environmental review. Therefore, the potential impacts of the "build" alternatives should be assessed with consideration to the increased anadromous fish access that the project will create.

A1-7 The RDEIS appears to focus on impacts to fish habitat in Des Moines Creek because it is "the only fish-bearing aquatic resource that would be crossed by the proposed project" (Page 3-134). However, the added impervious area that each of the "build" alternatives would add to the region will result in impacts to each of the affected subwatersheds, regardless of whether the road physically crosses the streams. Please include analysis of the impacts to each of the affected subwatersheds in the final EIS, and not just those that are physically crossed by the alternatives.

Wetlands

A1-8 Please evaluate how wetland impacts resulting from each of the "build" alternatives might impact base flows in Des Moines Creek in the final EIS.

SPECIFIC COMMENTS

A1-9 Table S-1, Page S-24: Under the description of Construction Impacts for Alternative C2, the RDEIS states, "Anadromous fish runs do not occur in the reaches of Des Moines Creek that will be affected." However, stormwater discharge and increased impervious surface in the Des Moines Creek watershed will occur with this alternative. These impacts could potentially affect the entirety of Des Moines Creek. Additionally, part of the proposed mitigation is to replace a fish-blocking culvert at Marine View Drive. This will allow anadromous access further upstream in Des Moines Creek, so the analysis should address potential impacts to anadromous fish upstream of Marine View Drive.

A1-10 Page 2-27, paragraph 4: "Alternative C3 would encroach into the northeast corner of Des Moines Creek Park by crossing through the park on an elevated structure." Figure 2.3-8 does not show the road crossing the park on a structure.

A1-11 Page 3-30, paragraph 3: This section discusses the use of noise barrier mitigation and states that areas for barrier mitigation were considered for each of the "build" alternatives. Please provide some additional discussion about the potential use of noise barriers in the vicinity of Des Moines Creek Park, and whether or not it is possible or worthwhile to use this type of mitigation to minimize noise impacts to wildlife species that inhabit the park.

Response A1-5

Waterfowl concentrations near airports are typically deterred to avoid collisions with aircraft. During the design phase of the project, WSDOT will coordinate with the FAA to develop appropriate methods to discourage waterfowl use of new stormwater facilities in areas where airport restrictions apply. This coordination will occur during the design phase of the project.

At this time, the FAA discourages the use of netting and prefers the use of floating or solid covers. WSDOT will pursue options other than netting to control waterfowl use, such as planting shrub vegetation or using floating covers. However, it is possible that nets will be used on some of the stormwater facilities if the FAA determines that nets are the best way to control waterfowl. If nets are used, birds caught in the nets could be harmed.

No federal- or state-listed sensitive, threatened, or endangered wildlife species regularly breed in, forage in, or occupy the project area of the build alternatives. Because of this, the waterfowl management method used near the airport will not affect threatened or endangered wildlife species.

Response A1-6

The Revised DEIS analysis of fish in Des Moines Creek was done assuming anadromous fish use up to RM 1.0, which is the extent to which King County and WDFW have determined anadromous fish to be present. This is upstream of the Marine View Drive project, which is located at RM 0.4.

Response A1-7

Section 3.7 of the EIS has been revised to include an analysis of the effects of adding impervious surfaces to each of the affected watersheds.

Response A1-8

The SR 509 project is not expected to impact Des Moines Creek base flows. Wetland impacts within the basin have been reduced to 0.3 acre. Wetland functions such as water detention and retention that could be affected would be mitigated within the basin, fully compensating for wetland functions that contribute base flow to Des Moines Creek. Additionally, stormwater would be infiltrated wherever subsurface conditions allow, which would help preserve base flow. See also response to Comment A1-4.

Response A1-9

The referenced text in Table S-1 pertains to construction activity impacts associated with bridge construction. The proposed bridges are located above the reach of documented anadromous fish use. Impacts associated with runoff from impervious surfaces are summarized under the Operational Impacts heading in Table S-1. This text has been revised to more clearly identify impacts associated with runoff.

Response A1-10

Figure 2.3-8 has been corrected to show the bridge crossing of Des Moines Creek Park.

Response A1-11

Your comment is noted. Noise impact criteria and analysis are based on processes and requirements for the human environment. Wildlife species hear sounds differently than humans and differently from one another. Currently, there are no approved methodologies or processes to accurately assess highway noise impacts on wildlife. Furthermore, existing aircraft flights over Des Moines Creek Park generate sound levels much higher in amplitude than those anticipated to result from SR 509. Also, the use of noise barriers for abating traffic noise within parks typically does not meet WSDOT's reasonableness criteria.

A1-12

Page 3-92, paragraph 5: This paragraph states, “opportunities to address stormwater issues using a watershed approach would be sought. This approach would focus on treating stormwater at the subwatershed level, emphasizing infiltration techniques and restoration of natural hydrological functions where practicable.” We encourage you to utilize this approach as a starting point, rather than relying on opportunities to integrate into the plan for engineered solutions. Such an approach would not only benefit the watershed ecologically, but it could help reduce conflicts between engineered solutions such as large detention ponds and Federal Aviation Administration requirements.

If you have any questions about these RDEIS comments, please call Lynn Childers at the Western Washington Field Office, U.S. Fish and Wildlife Service, in Lacey, Washington, at (360) 753-5831.

DRAFT SECTION 4(f) EVALUATION

It appears that a diligent effort has been made to identify alternatives that would avoid the use of parkland, but no feasible and prudent alternative has been identified that would completely avoid impacts to parks. The preliminary preferred alternative would place an elevated highway across the northeast corner of Des Moines Creek Park. The highway crosses over a small portion of a 16-acre park wetland designated “Wetland A” in the document. The project would cause slight increases in noise at other area parks, but these increases are expected to be increments that would not be noticeable to park users. A private golf course developed on leased Port property is not deemed a Section 4(f) property.

Des Moines Creek Park, with 95.8 undeveloped acres of forest and stream habitat, is the largest natural preserve of woodland environment in the highly urbanized SeaTac/DesMoines area. The park includes a ravine, wetlands, streams and woodlands and a paved trail along Des Moines Creek. The tranquility of the setting is marred by the park’s proximity to Sea-Tac International Airport, and the park is affected by frequent aircraft noise; nevertheless, the park is considered an important element of local, community and regional park systems. It will be critically important that the project is developed in a way that maintains or enhances the park’s recreational value as a natural preserve for passive public enjoyment.

The affected parkland is owned by the King County Park System. It lies within the City of SeaTac and is also currently managed by the City. The County and the City of SeaTac are negotiating a possible transfer of ownership from the County to the City, but a mutually satisfactory agreement has not yet been reached.

The park, recreation and open space element of the SeaTac Comprehensive Plan places a high priority on the development of the Des Moines Creek Trail and maintenance of the natural habitat values of the park. Retaining the “rich array of wildlife, wildflowers and access to water environment is important to the quality of this park experience.” (Page 4-17 of the Draft Section 4(f) Evaluation) Direct and indirect impacts to the natural environment could affect the desired opportunities for passive recreational enjoyment of the park, and these impacts must be minimized in order that a recommendation to proceed can be forthcoming.

Of the alternatives presented in the Revised DEIS, the preliminary preferred alternative appears to be the best approach to minimize harm to the park and also to cause the least harm to the area’s wetland ecology and Des Moines Creek. Several mitigating measures have been proposed, including:

The highway would be an elevated structure along the entire alignment within the park. There is a stated goal to replace any lost park acreage with an equal amount of acreage adjacent to the park’s boundary and of reasonably equivalent or greater recreational utility. The Washington State Department of Transportation (WSDOT) would provide an extension of Des Moines Creek Trail to the north of the existing park. The WSDOT proposes to move the trailhead and associated parking if necessary to provide continued access. The

Response A1-12

A watershed approach for mitigating stormwater impacts was utilized for the project. Please see response to Comment A1-2 above.

WSDOT is also committed to financially assisting in the construction of a new Marine View Drive bridge over Des Moines Creek at the western edge of the park. The new bridge design will include a trail underpass and will provide for fish passage.

A1-13

Construction of SR 509 on park property is viewed as a use that will cause substantial harm to the park, and these mitigating measures will help to reduce harmful impacts. While these proposals show good faith, the document does not yet demonstrate the adequacy of park mitigation measures. The Department remains concerned about possible harm to the stream, riparian and wetland resources of the park and about replacement property for acreage impacted by the project. Because replacement property has not been specifically identified, it is difficult to evaluate. The document states that the replacement property is to “be determined through a coordinated land swap between the WSDOT and the City of SeaTac.” (page 4-31) While it is likely that adequate property will be offered, it is not demonstrated in the document. It is also not entirely clear who will own and manage the affected park acreage at the time the WSDOT needs to use it.

Before this Department concurs, under Section 4(f), that the project includes “all possible planning to minimize harm to the park property,” we request that you provide in the final document more specific information about land replacement proposals as well as any other measures that would minimize harm to the park values affected by the project. Please feel free to contact Nancy Stromsem, in the Columbia Cascades Support Office of the National Park Service, in Seattle, at (206) 220-4015, if you have questions about this Section 4(f) review.

We appreciate the opportunity to provide these comments.

Sincerely,



Willie R. Taylor
Office of Environmental
Policy and Compliance

Response A1-13

Measures that minimize impacts on the natural values of Des Moines Creek Park – the stream, riparian, and wetland resources – are presented in the revised Measures to Minimize Harm section of the Section 4(f) Evaluation (Section 4.5). The measures presented are drawn from the Vegetation and Wildlife, Fish, and Threatened and Endangered Species; Water Quality; and Wetlands sections of the EIS.

An Interagency Letter of Understanding has been signed by the City of SeaTac and WSDOT regarding mitigation for direct impacts on Des Moines Creek Park (see Chapter 4 of this FEIS). WSDOT would provide a roughly 100-foot-wide strip of replacement land within the existing SR 509 right-of-way south of 200th Street and immediately adjacent to the park’s western boundary. The land to be provided would be of equal size to that being acquired from the park and of reasonably equivalent recreational utility. The land would be transferred to either King County or the City of SeaTac, depending on which agency is owner of the park at the time of the transfer.

A2

United States Department of the Interior

FISH AND WILDLIFE SERVICE
911 NE 11th Avenue
Portland Oregon 97232-4181

AES/HC

To: Cascade Support Office, National Park Service
Seattle, Washington

From: Regional Director, U.S. Fish and Wildlife Service
Region 1, Portland, Oregon

Subject: Review of Revised DEIS and Section 4(f) Evaluation for Extension of SR-509:
Corridor Completion/I-5/South Access Road, Cities of Des Moines and Sea Tac,
King County, Washington (ER 02/0146)

We have reviewed the subject document and offer the following comments for inclusion in the Department of Interior's response to the Federal Highway Administration. We evaluated the proposed project alternatives for potential impacts to fish and wildlife resources and their habitat, with specific attention to proposed, listed and endangered species under our jurisdiction.

Attachment

A2-1

Region 1 of the U.S. Fish and Wildlife Service has reviewed the Revised Draft Environmental Impact Statement (RDEIS) and Section 4(f) statement for the proposed SR 509 Corridor Completion/I-5/South Access Road, and presents comments for the response to the National Park Service. Our Western Washington Field Office is familiar with the proposed project, because of ongoing involvement through the NEPA/404 Merger Agreement. In general, the RDEIS does not place enough emphasis on watershed-based approaches for mitigating stormwater impacts. The project takes place in a highly urbanized setting with a number of complex environmental and regulatory constraints. We suggest a more proactive approach in the Final EIS, to creatively manage stormwater impacts. This approach will result in an ecological benefit for the species and their habitats, and can help the project meet the complex requirements of this particular situation. Although we do not anticipate major impacts to listed species from this project, we do have serious concerns about the continued degradation of the affected wetlands, watersheds, and remaining fish and wildlife habitat in the project area.

We request you address the following three large concerns we have, along with the rest of our comments, in the final EIS, for the proposed SR 509/South Access Road Project: (1) Approach mitigation of stormwater impacts from a watershed level, using non-engineered solutions as a starting point; (2) Clarify the extent to which each of the “build” alternatives might negatively impact base flows for each of the affected subwatersheds in the project area; and (3) Expand the analysis of potential impacts to anadromous fish and their habitat to include each of the subwatersheds affected by the “build” alternatives, and to areas where ongoing and future mitigation efforts will allow fish access in the future.

GENERAL COMMENTS

Stormwater

The RDEIS discusses a combination of conventional best management practices and highly engineered facilities (i.e., large detention ponds and underground vaults) for meeting stormwater mitigation requirements. However, we suggest an approach using non-engineered solutions as a starting point would be more effective at restoring degraded hydrologic functions.

The RDEIS references a technical memorandum by the consulting firm CH2M Hill, entitled “Stormwater Treatment Technical Memorandum for SR 509/South Access Road” (August 2001). We were also provided with an earlier document, by the same firm entitled “SR 509 Stormwater Practicability and Environmental Decision Making, Preliminary Draft” (September 2000). The earlier document discusses, in some detail, ideas for “alternative watershed-based mitigation” drawn, in part, from the 1997 Draft Des Moines Creek Basin Plan. These ideas include low flow augmentation and habitat restoration. We were disappointed to learn that the current memorandum (August 2001) does not include such emphasis on watershed-based approaches.

A2-2

The current technical memorandum (August 2001), cited in the RDEIS, states that current cost estimates for the project’s stormwater treatment measures have reached at least \$115 million. It would be helpful to see what watershed-based mitigation opportunities are possible, and how those costs might compare with the cost of the proposed concepts.

Response A2-1

Please see response to Comment A1-1 from the U.S. Department of the Interior.

Response A2-2

Please see response to Comment A1-2 from the U.S. Department of the Interior.

We are concerned the RDEIS lacks an evaluation of the potential for watershed-based stormwater mitigation alternatives, and we request a more thorough analysis of the possibilities and benefits of such an approach in the final EIS. We encourage the project proponents to fully investigate the use of non-engineered solutions that could result in protected water quality/quantity as well as habitat enhancement and creation. Tools that could be incorporated in such an approach include:

A2-3

1. Use of “low impact development” methods such as soil amendment, mulching, etc., to help absorb stormwater and increase infiltration rather than increasing the amount of stormwater discharged directly to surface waters;
2. Permanent removal and restoration of existing impervious surfaces to reduce the total impervious area in a subwatershed;
3. Replacement of lost stormwater storage capacity with newly created or restored floodplain storage areas;
4. Augmentation of in stream base flows through permanent acquisition of water rights;
5. Locating water quality treatment structures outside of riparian, shoreline, and wetland buffer areas;
6. Restoration of riparian buffers; and,
7. Permanent acquisition of wetlands, riparian areas, and upland areas for use as “infiltration reserves” that improve and/or protect hydrologic functions.

A2-4

We are also concerned the RDEIS does not contain enough information or analysis on the potential impacts of the “build” alternatives on the base flows of the affected subwatersheds. Instead the emphasis is focused on potential increases in runoff rates and volumes. The September 2000 memorandum from CH2M Hill points out base flows in Des Moines Creek have been reduced 21 percent from pre-development conditions. Please clarify how each of the “build” alternatives could alter base flows in each of the affected subwatersheds, in the final EIS.

Fish and Wildlife Habitat

A2-5

- We understand the project’s proximity to the Seattle-Tacoma International Airport poses some significant design constraints, especially with regard to minimizing potential wildlife attractants that may pose a hazard to aircraft operation. We are concerned, though, about the proposal to place netting over open water areas such as stormwater ponds to prevent bird use. Please include in your final EIS analysis, the potential effects that such netting might have on wildlife attracted to the open water areas that may be trapped in the netting. We encourage you to pursue other options, such as planting shrub

Response A2-3

Please see response to Comment A1-3 from the U.S. Department of the Interior regarding the watershed-based approach to stormwater management. Regarding the specified management tools:

1) Low-impact development methods were considered and analyzed as part of the stormwater VE. At this time there is no accepted way to document flow control benefits of soil amendments, nor have they been accepted as a method of providing enhanced treatment instead of more traditional stormwater facilities. If these conditions change, WSDOT will further investigate the use of soil amendments during the design phase of the project.

2) The redesigned SR 516 interchange would have less impervious surface than the existing interchange. Opportunities would be sought to remove existing pavement where not needed as a result of the proposed project design.

3, 4, 6, and 7) Stormwater would be infiltrated wherever groundwater conditions allow to reduce loss of stormwater storage capacity and protect hydrologic functions. Additionally, if the proposed project is approved and funded, WSDOT would contribute to funding of Des Moines Creek Basin Plan improvements. These include expansion of the Northwest Ponds regional detention facility (which would increase infiltration), a low-flow augmentation facility in the vicinity of South 200th Street (to augment stream base flows), and restoration of riparian buffers. Purchase of infiltration reserves are beyond the scope of this project

5) Stormwater treatment facilities would be located outside riparian and wetland buffers, as currently defined, wherever feasible; there are no shorelines in the project area. Because of the topography of the area and proximity of the build alternatives to existing wetlands, however, some stormwater facilities may be located in riparian areas and wetland buffers.

Response A2-4

Please see response to Comment A1-4 from the U.S. Department of the Interior.

Response A2-5

Please see response to Comment A1-5 from the U.S. Department of the Interior.

vegetation to dissuade birds from landing on the water, instead of using potentially harmful netting.

A2-6 • The project proposes to replace a culvert that is currently an anadromous fish barrier at Marine View Drive. The Marine View Drive project is a separate project that is already through some stages of environmental review. Therefore, the potential impacts of the “build” alternatives should be assessed with consideration to the increased anadromous fish access that the project will create.

A2-7 • The RDEIS appears to focus on impacts to fish habitat in Des Moines Creek because it is “...the only fish-bearing aquatic resource that would be crossed by the proposed project...” (Page 3-134). However, the added impervious area that each of the “build” alternatives would add to the region will result in impacts to each of the affected subwatersheds, regardless of whether the road physically crosses the streams. Please include an analysis of the impacts to each of the affected subwatersheds in the final EIS, and not just those that are physically crossed by the alternatives.

A2-8 Wetlands

- Please evaluate how wetland impacts resulting from each of the “build” alternatives might impact base flows in Des Moines Creek in the final EIS.

SPECIFIC COMMENTS

A2-9 Table S-1, Page S-24: Under the description of Construction Impacts for Alternative C2, the RDEIS states, “Anadromous fish runs do not occur in the reaches of Des Moines Creek that will be affected.” However, stormwater discharge and increased impervious surface in the Des Moines Creek watershed will occur with this alternative. These impacts could potentially affect the entirety of Des Moines Creek. Additionally, part of the proposed mitigation is to replace a fish-blocking culvert at Marine View Drive. This will allow anadromous access further upstream in Des Moines Creek, so the analysis should address potential impacts to anadromous fish upstream of Marine View Drive.

A2-10 Page 2-27, paragraph 4: “Alternative C3 would encroach into the northeast corner of Des Moines Creek Park by crossing through the park on an elevated structure...” Figure 2.3-8 does not show the road crossing the park on a structure.

A2-11 Page 3-30, paragraph 3: This section discusses the use of noise barrier mitigation and states that areas for barrier mitigation were considered for each of the “build” alternatives. Please provide some additional discussion about the potential use of noise barriers in the vicinity of Des Moines Creek Park, and whether or not it is possible or worthwhile to use this type of mitigation to minimize noise impacts, to wildlife species that inhabit the park.

A2-12 Page 3-92, paragraph 5: This paragraph states, “...opportunities to address stormwater issues using a watershed approach would be sought. This approach would focus on treating stormwater

Response A2-6

Please see response to Comment A1-6 from the U.S. Department of the Interior.

Response A2-7

Please see response to Comment A1-7 from the U.S. Department of the Interior.

Response A2-8

Please see response to Comment A1-8 from the U.S. Department of the Interior.

Response A2-9

Please see response to Comment A1-9 from the U.S. Department of the Interior.

Response A2-10

Please see response to Comment A1-10 from the U.S. Department of the Interior.

Response A2-11

Please see response to Comment A1-11 from the U.S. Department of the Interior.

Response A2-12

Please see response to Comment A1-12 from the U.S. Department of the Interior.

**A2-12
(cont.)**

at the subwatershed level, emphasizing infiltration techniques, and restoration of natural hydrological functions where practicable.” We encourage you to utilize this approach as a starting point, rather than relying on opportunities to integrate into the plan for engineered solutions. Such an approach would not only benefit the watershed ecologically, but it could help reduce conflicts between engineered solutions such as large detention ponds and Federal Aviation Administration requirements.

Thank you for the opportunity to comment. If you have any questions, please call Lynn Childers at the Western Washington Field Office, in Lacey, Washington, at (360) 753-5831.

A3



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

May 1, 2002

MAY 08 2002

Reply To
Attn Of: ECO-088

Ref: 96-003-FHA

Elizabeth Healy
Area Engineer
Federal Highway Administration
711 S. Capitol Way
Suite 501
Olympia, WA 98501

Dear Ms. Healy:

We have completed our review of the Revised Draft Environmental Impact Statement (RDEIS) and Draft Section 4(f) Evaluation for the proposed **SR 509: Corridor/I-5/ South Access Road** project, pursuant to the Environmental Review Process, under section 309 of the Clean Air Act and section 102(2)(c) of the National Environmental Policy Act as amended. Section 309, independent of NEPA, directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Thank you for the opportunity to allow us the opportunity to provide input on the Revised Draft Environmental Impact Statement at this time.

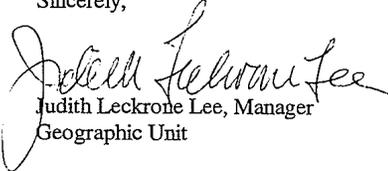
The RDEIS proposes an action plan to improve regional connections with an extension of SR-509 to serve future transportation needs in southwestern King County and to improve southern access for Seattle-Tacoma International Airport (Sea-Tac Airport). The lead agency (the Federal Highway Administration) in cooperation with the project proponents, the Washington Department of Transportation and local agencies, proposes to construct a SR-509 corridor extension. In addition, this proposed project will construct a south access road to skirt the southern edges of Sea-Tac Airport and add capacity improvements to I-5 between South 210th and South 310th Street.

EPA's main concerns are that the Final EIS needs to address issues surrounding aquatic resources, air quality, direct, indirect and cumulative effects, environmental justice, and Tribal consultation. Based on our review, we have assigned the Draft Supplement EIS a rating of EC-2 (Environmental Concerns - Insufficient Information). This rating and a summary of our comments will be published in the *Federal Register*. For your reference, we have enclosed a copy of the rating system we used in our evaluation of this RDEIS.

Enclosed please find our detailed comments, which elaborate further on these issues. We are interested in working with the interested agencies in the resolution of these issues. I encourage you to contact Tom Connor at (206) 553-4423 at your earliest convenience to discuss our comments and how they might best be addressed.

Thank you for the opportunity to review this Revised Draft EIS on the SR 509: Corridor/I-5/
South Access Road of King County.

Sincerely,



Judith Leckrone Lee, Manager
Geographic Unit

Enclosures

cc John White, P.E. (WSDOT)

EPA COMMENTS ON SR-509: CORRIDOR COMPLETION/I-5/SOUTH ACCESS ROAD
REVISED DRAFT ENVIRONMENTAL IMPACT STATEMENT
AND DRAFT SECTION 4(f) EVALUATION

AQUATIC RESOURCES

For background purposes, the project area is located within Water Resource Inventory Area (WRIA) 9, as designated by the State of Washington. Within the project area there are two waterbodies listed as impaired under Section 303(d) of the Clean Water Act (Section 303, Water Quality Standards and Implementation Plans), Des Moines Creek and Mill (Hill) Creek. Des Moines Creek flows directly into Puget Sound, while Mill Creek is a lowland tributary that flows into the lower Green River near river mile 23.9. Based on Department of Ecology's most current 303(d) list of 1998, Des Moines is listed for one parameter, fecal coliform bacteria. Mill Creek is listed for several parameters, which are temperature, dissolved oxygen, and fecal coliform bacteria. Related to beneficial uses and Endangered Species Act (ESA), Washington Department of Fish and Wildlife has identified Des Moines Creek as containing anadromous habitat. As an often quoted reference source, *A Catalog of Washington Streams for the Puget Sound Region* (1975) lists Des Moines Creek and Mill Creek as being utilized by coho salmon. Currently, Puget Sound/Straight of Georgia Evolutionary Significant Unit (ESU) coho salmon are candidate species under ESA. Furthermore, the RDEIS has indicated that the project area is within the critical habitat of Puget Sound ESU chinook salmon and that chinook presence could be near the project area (page 3-130).

FISHERIES

A3-1

The FEIS should confirm, according to best available information (e.g., information contained within *A Catalog of Washington Streams for the Puget Sound Region*), if coho salmon do utilize Mill Creek.

GROUNDWATER

A3-2

1) The FEIS should provide improved disclosure on well ownership, usage, and existence of any specific water quality issues for these community wells where groundwater quality is of primary concern.

Figure 3.5-2 (page 3-88) shows the location of four wells within the project area. Active groundwater contamination and the spread of this pollution is an on-going concern within the project area. For example, the RDEIS stated that "contaminated groundwater [near the Midway Landfill Superfund site] was found beyond the landfill boundary" (page 3-269).

A3-3

2) In reference to the community wells and in recognition of the importance of maintaining groundwater and drinking water quality, the Final Environmental Impact Statement (FEIS) should disclose if proposed project activities could impair the quality of the water associated with

Response A3-1

Section 3.7 of the EIS has been revised to include information regarding potential coho use of Mill Creek.

Response A3-2

The groundwater discussion in Section 3.5 has been expanded. Based on Department of Ecology well records, the area in question has the following wells:

Public wells – Highline Water District (several wells near Angle Lake and several wells at Des Moines Creek near South 200th Street); King County Water District 75 (well near Angle Lake and Des Moines well on Memorial Drive); King County Water District 54 (well on South 219th Street east of existing SR 509 roadway); and Port of Seattle (two wells near Tyee Pond).

Private wells – Washington Natural Gas water well (west of 24th Avenue South), a private well on South 188th Street and SR 99, and two private wells on Des Moines memorial Drive near South 192nd Street.

Response A3-3

Public wells that could potentially be impacted by the SR 509 project include Highline Water District wells, King County Water District No. 75 wells, King County Water District No. 54 wells, Washington Natural Gas well, and three private wells (see revised Figure 3.5-2 in EIS). Highline Water District wells (Well 1, Well 2M, and Tyee well) are the only wells close to the future roadway alignment of SR 509. During construction of the roadway, WSDOT would work with Highline Water District to ensure that existing water supply is not contaminated. Construction BMPs and water quality monitoring of the stormwater runoff from the construction site also would be implemented.

WSDOT would work with each well district/owner to ensure that infiltration from the SR 509 stormwater treatment facilities do not occur in the vicinity of these wells. This commitment assures compliance with restrictions within the Groundwater Management Protection Area (GWMA) of South King County (currently in development) and forthcoming BMPs from the Washington State Department of Health Source Water Assessment Program (SWAP) (expected in 2004). The protection of groundwater quality expected from these two programs will satisfy Chapter 173-200 WAC water quality requirements.

A3-3
(cont.)

local wells in the project area. In general, the RDEIS is not clear how it evaluated groundwater impacts within the project area due to highway runoff.

The RDEIS (Figure 3.5-2) has identified the presence of three community wells in the project area located within the Des Moines Creek watershed. On page 3-82, the RDEIS states that “infiltrated stormwater pollutants from new impervious surfaces could cause potential adverse impacts on groundwater quality.” While the RDEIS states that adverse impacts “would be low if standard best management practices (BMPs) are implemented” (page 3-82), the FEIS should disclose if these anticipated low impacts could cause impairments to existing and future beneficial uses of the groundwater (Chapter 173-200 WAC, Water Quality Standards for Ground Waters of the State of Washington).

In support of the goal of Chapter 173-200, the FEIS should discuss how project related activities would “maintain the highest quality of the state’s ground water quality...through the reduction or elimination of discharge of contaminants to the state’s ground waters.” Hydrologically, there are pathways and interfaces between surface waters and groundwaters. With this concept in mind, the FEIS should disclose if anticipated low impacts could cause groundwater quality standards to be exceeded.

SURFACE WATERS

1) The FEIS should disclose how the proposed project would restore beneficial uses and promote protection of 303(d) listed waterbodies within the project area.

We would like to acknowledge Washington Department of Transportation’s (WSDOT) proposed mitigation and restoration efforts within the Des Moines basin. These efforts include replacement of an existing box culvert (river mile 0.4) which has been identified as the major fish barrier in the system, as well as proposed stream restoration and riparian enhancement in the vicinity of Marine View Drive (RDEIS, page 3-144). According to recent studies reflecting the best available science (Roni et. al., 2002¹), culvert replacement and improvement are essential elements for stream restoration and habitat reconnection. Yet, we still have concerns that are presented below.

A3-4

A) Describe how the proposed project will be integrated with watershed cleanup activities that will be undertaken within the project area?

Washington State Department of Ecology (Ecology) is currently drafting a Near-Term Action Agenda for the Lower Green River watershed of which the Mill Creek system is an essential element. Ecology will be proposing water cleanup projects on the lower

¹Roni P., Beechie, T. J., Bilby, R. E., Leonetti, F. E., Pollock, M. M., and Prees, G. R. (2002). *A Review of Stream Restoration Techniques and a Hierarchical Strategy for Prioritizing Restoration in Pacific Northwest Watersheds*. North American Journal of Fisheries Management 22:1-20.

Response A3-4

WSDOT will not be participating in the Near Term Action Agenda projects as mitigation for the SR 509 project.

Green River next fall which will be consistent with the Near-Term Action Agenda and sensitive to other inputs from basin stakeholders. At this time, there are twelve proposed WRIA-wide Near-Term Action Agenda projects, such as adoption of stormwater standards for protection of salmon habitat and water quality assessment projects to review conditions on the lower Green River and the Duwamish Waterway. In addition, proposed lower Green River projects would specifically target Mill Creek. Proposed site-specific projects on Mill Creek are a West Hill Creek spring channel improvement and a central conveyance storage and water quality improvement. As these proposed projects illustrate, Mill Creek would become a priority stream for Ecology as near-term assessment and clean-up activities in the Lower Green River watershed.

B) Describe how the proposed project will address potential additional water quality impairment of 303(d) listed waterbodies due to elevation of stormwater discharges.

Based on proposed project actions, both Des Moines Creek and Mill Creek have a strong possibility of receiving and experiencing additional stormwater impacts as highlighted in the RDEIS (Tables 3.5-3 to 3.5-7). Also, the RDEIS (page 3-73) states that “total runoff volumes would most likely be higher compared with existing conditions, and the duration of flow for a given storm volume would be shorter.” If additional stormwater impacts are anticipated, EPA is concerned that proposed stormwater quality management activities in the project could have a direct impact on beneficial uses related to cold water fisheries of these impaired waterbodies. For improved stormwater mitigation, we strongly recommend that the FEIS undertake a watershed-based approach.

C) The FEIS should disclose measures to retain beneficial uses and restore water quality that would be applied with project implementation.

As geological studies (Figure 3.4-3, page 3-57) illustrate, hillslope and riparian sections of two independent salmon-bearing tributaries (Des Moines Creek and Massey Creek) do contain landslide and erosion hazard areas. Studies have documented that stormwater can increase peak flows and flow volumes (Booth and Jackson, 1994; May et al., 1996; and Booth and Jackson, 1997; Booth, 2000; and Beach, 2002). Furthermore, stormwater can cause an elevation of stream channel erosivity and channel width expansion (Robinson, 1976 and Kirkpatrick, 1990). We are concerned that elevated stormwater discharges to Des Moines Creek could decrease streambank stability in riparian areas that are susceptible to erosion.

D) To aid in understanding additional urbanization impacts within the project area, the FEIS should disclose the amount in acres (above existing levels) of impervious surfaces that would be created as a result of proposed actions related to SR-509 and South Access Road improvements. The RDEIS discusses the amount of impervious surfaces that would be generated due to I-5 improvements, but not for other improvements.

Response A3-5

A watershed approach for mitigating stormwater impacts was utilized for the project (please see response to Comment A1-2 from the U.S. Department of the Interior) that would be protective of water quality in 303(d) listed waters. The 303(d) listing cites Des Moines Creek for high fecal coliforms; the Green River for heavy metals and temperature; and Mill Creek for temperature, dissolved oxygen, and fecal coliform. Trees and shrubs would be planted along segments of Des Moines Creek and around treatment facilities to mitigate for potential increases in water temperature. Fecal coliform bacteria are usually not generated by highway runoff.

Heavy metals typically appear in the creeks during first fall flush storms. However, enhanced treatment provided by the proposed stormwater treatment system would prevent most metals from entering the creeks. All stormwater would be treated and infiltrated, or would be detained and then would receive enhanced treatment for removal of metals and other pollutants, except at stormwater subbasin D3, where stormwater would flow through a constructed filter strip of amended soils to a pond on Tyee Golf Course. Details of stormwater facilities and treatment are provided in Section 3.5. Storms with a return period higher than the design event could be released into the creeks and could bypass some facilities. However, pollutants of concern for 303(d) listing in runoff from these storms would be diluted and would not present a significant water quality issue.

Response A3-6

As a member of the Des Moines Creek Basin Plan committee, WSDOT will contribute funding to the Capital Improvements Projects identified in the plan. These projects include a high-flow bypass and expansion of the Northwest Ponds regional detention facility, which would reduce flows in the lower reaches of Des Moines Creek. Implementation of the proposed stormwater design for the SR 509 project, in conjunction with these Capital Improvement Projects, would reduce peak flows in Des Moines Creek by two to five times compared to peak flows under existing conditions (Olympic Associates Company 2002). Because stormwater releases to the existing creek would be significantly reduced, no increase in erosion potential to the existing stream banks is anticipated.

Response A3-7

The Revised DEIS reported that the total increase in impervious surfaces is 126.5 acres for Alternative B (89.5 acres for the SR 509 freeway extension and South Access Road, and 37 acres for the I-5 improvements); 113 acres for Alternative C2 (76 acres for the SR 509 freeway extension and South Access Road, and 37 acres for the I-5 improvements); and 113.5 acres for Alternative C3 (76.5 acres for the SR 509 freeway extension and South Access Road, and 37 acres for the I-5 improvements).

WETLANDS

EPA appreciates the efforts towards developing a preferred alternative. From a wetland perspective, the preferred alternative appears to be the least environmentally damaging. It has fewer acres of direct impact, fewer acres of impacted buffer, and the lowest amount of cut and fill material. Yet, the following concerns and issues should be addressed in the FEIS.

A3-8

1) The FEIS should clarify information contained within Table S-1.

Information in Table S-1 appears to conflict with the text and downplays some of the impacts. Table S-1 states that there are no anadromous fish in Des Moines Creek. This information conflicts with page 3-98 and Figure 3.5-4, which indicate salmonid usage in this system.

A3-9

Table S-1 also indicates "potential" shade impacts to wetlands A, B, and D. Page 4-25 indicates effects are "expected to be minimal because of the height of the structure." These statements both seem to understate the impact of shading. The roads will be six lanes wide. They will not only shade vegetation below from direct sunlight, but they will also prevent rainfall on these areas. As we are not told the height of the structure, it is difficult to truly understand the impact.

A3-10

2) The FEIS should discuss how impacts to Wetland D relate to the proposed mitigation activities at the site. Also, the FEIS should disclose further what BMPs will be implemented to maintain the existing functions of the Tyee Pond wetland complex

Regarding Wetland D, the issue of shading is of particular concern in relation to Wetland D (Tyee Pond). The Tyee Pond is a mitigation site for the Seattle Tacoma International Airport's third runway project. The Tyee Pond complex was designed to contain hydrocarbon spills and prevent them from reaching Des Moines Creek (page 3-69). This 4.9 acre complex, is rated as a Class II wetland by the Ecology Rating system, and is hydrologically connected to Des Moines Creek (Table 3.6-1). The RDEIS states that the project proponent, Washington Department of Transportation (WSDOT), proposes to construct a bridge to arch over a portion of these wetlands. This new bridge will contribute to permanent shading over portions of the mitigation site. To mitigate for potential tree removal and permanent shading impacts from the proposed bridge site, WSDOT will transplant shade tolerant vegetation within the impacted area of Tyee Pond.

A3-11

3) Causes of and rationale for temporary impacts should be described in the FEIS.

The RDEIS has identified clearing, grading, excavation and filling as "temporary impacts" to wetlands and buffer. These activities may be temporary, but the impacts of these activities could destroy the wetland functions. Even if the fill is later removed and the area re-graded, the affected wetland will have to "start from scratch" and it is possible that functions will never totally recover in those areas.

Response A3-8

The text in Section 3.6, *Wetlands*, has been corrected to state that Des Moines Creek has been classified by King County as a Class 2 stream with salmonids to River Mile (RM) 1.0. Figure 3.5-4 is correct. According to the King County Sensitive Areas Map Folio, Des Moines Creek is a Class 2 stream up to Tyee Ponds. Anadromous fish use has not been documented by King County and WDFW biologists upstream of RM 1.0 (as is stated in the DEIS); however, King County and WDFW biologists consider the upstream limits of anadromous fish use to extend up to RM 1.0. The referenced text in Table S-1 pertains to construction activity impacts associated with bridge construction. The proposed bridges are located above RM 1.0. Table S-1 correctly states that anadromous fish runs do not occur in the stream reaches that would be crossed.

Response A3-9

The EIS text has been revised to describe shading impacts in terms of height and width of bridge structures, and separation between northbound and southbound lanes to allow light and precipitation to reach underlying vegetation.

Response A3-10

Tyee pond (Wetland D) is a spill containment facility, not a wetland mitigation site. The SR 509 project would span the pond with a bridge and would not interfere with the spill containment function of the pond.

Response A3-11

Construction activity in wetlands would be minimized as much as practicable. The selected bridge design would minimize construction activity impacts in wetlands, and would be limited to placing of bridge piers. Where unavoidable, access roads would be built to the minimum width, and best management practices would be implemented to avoid soil compaction. Areas disturbed during construction would be restored by replanting with native trees and shrubs upon completion of construction activity.

A3-12 4) It is not clear if “on-site” storage area is within a wetland or not and should be clarified in the FEIS.
Page 3-123 states: “ wetland water quality could be adversely affected during construction as a result of on-site storage and use of fuel and lubricants for construction equipment.” Every attempt should be made to ensure activity in wetlands and buffers is minimized to the maximum extent possible. Wetland and buffer areas should not be used for storage of materials of any kind, and use of equipment should also be restricted to the maximum extent possible in these areas. Wetlands should not be used as detention facilities of pollutants during construction. Fueling of equipment should not occur within or near wetlands, to avoid possible contamination.

A3-13 5) Clean Water Act Section 404 permit will, of course, be needed prior to work in any wetland areas.

AIR QUALITY

A3-14 1) The FEIS should disclose why ambient CO concentrations for South 200th Street and South Access Road for the preferred alternative would be significantly higher than calculated under the No Action Alternative.

On page 3-8, the RDEIS indicates that predicted 2020 ambient CO concentration for South 200th Street and South Access Road for the preferred alternative will be 92 percent higher than calculated under the No Action Alternative. This is significant, however, the RDEIS offers no explanation.

A3-15 2) EPA recommends that the FEIS should reflect revised dispersion modeling using receptors located according to CAL3QHC² user’s guide.

For important air quality calculations CAL3QHC is a mobile source dispersion model recommended by EPA. Based on the statement expressed on page 3-11, it would appear that modeling receptors have been placed incorrectly. On page 3-11, the RDEIS states that a CO receptor is located 25 feet away from the travel-way and that 1-hour average concentrations were predicted at a maximum value of 4.1 parts per million. The CAL3QHC user guide (page 12) suggests that: “receptors should be located outside the “mixing zone” of the free flow links (i.e., total width of travel lanes plus 3 meters (10 feet) on each of the outside travel lanes).”

²EPA, User’s Guide to CAL3QHC Version 2.0: A Modeling Methodology for Predicting Pollutant Concentrations Near Roadway Intersections, U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, Technical Support Division; Research Triangle Park, NC.; EPA-454/R-92-006; November 1992.

Response A3-12

Fuel and equipment storage areas would not be located in wetlands or their buffers.

Response A3-13

Required permits and approvals for the SR 509 project, including a Section 404 permit, are listed in the Fact Sheet, the Summary, and Appendix A of the EIS.

Response A3-14

CO concentrations at the South Access Road ramps with South 200th Street would be higher under the Preferred Alternative than under the No Action Alternative because traffic would increase in this area due to the addition of ramps to and from the proposed South Access Road that would not exist under the No Action Alternative. Under the Preferred Alternative, CO concentrations at this location would be less than the NAAQS standards; therefore, they would not pose a risk to human health and welfare and would not result in a significant adverse impact.

Response A3-15

Receptor locations were placed according to EPA guidelines. For all signalized intersections, receptors were placed at mid-sidewalk distance in areas generally accessible to the public. At the specific location in question, the distance of 25 feet from the traveled lane was appropriate because the new roadway is a controlled access facility with no adjacent pedestrian access. The 25-foot distance is conservative; the closest public access would be more than 25 feet away.

A3-16 3) The FEIS should disclose if FHWA has given its conformity approval for Puget Sound Regional Council's (PSRC) proposed Metropolitan Transportation Plan and Transportation Improvement Plan.

On page 3-12, the RDEIS states that " PSRC Metropolitan Transportation Plan (MTP) and Transportation Improvement Plan (TIP) have been . . . accepted by EPA for the proposed SR 509." This statement is incorrect. EPA does not take action to approve or accept MTP and TIP conformity. MTP and TIP conformity approval is done by Federal Highway Administration (FHWA).

DIRECT, INDIRECT, AND CUMULATIVE EFFECTS

DIRECT EFFECTS

A3-17 1) The FEIS should provide clear explanation of the immediate impact (or foot-print) of the proposed action.

On page 3-128, the RDEIS states that "Des Moines Creek is the only fish-bearing aquatic resource located within 2,000 feet of the proposed build alternatives." This is misleading and confusing since Mill Creek (another local fish-bearing system) might also be impacted by the proposed project. In addition, stormwater impacts and associated influences on salmonid habitat are not restricted to arbitrary distances from the proposed build alternatives. For example, since elevated stormwater volumes will enter Des Moines Creek, the whole system, with an estimated length of approximately 3.5 river miles (*A Catalog of Washington Streams for the Puget Sound Region*), will have to adjust for these additional discharges.

SECONDARY AND CUMULATIVE EFFECTS

A3-18 1) An improved Secondary and Cumulative Impacts Section should be provided within the FEIS.

This section within the RDEIS states that many projects are ongoing in the project vicinity, yet does little to specifically analyze what this means, or how this project and other proximate proposed projects might contribute to the total impact within the basins. The RDEIS lists other large projects expected but then states "these projects ...are subject to separate environmental reviews; analysis of their specific impacts is not included in this revised DEIS." While an exhaustive analysis of other projects is not expected, a cumulative impacts section should provide some discussion of what associated project impacts are expected, and how this project will add to the suite of impacts. Impacts from this project are in the same watersheds as the SeaTac third runway project (which will have heavy impact on Des Moines and Miller Creeks). Yet the Sea Tac project is mentioned almost as an aside, and only as total wetland acres affected (the acreage is

Response A3-16

On June 27, 2002, the PSRC Executive Board approved refinement of Destination 2030 (the Puget Sound Region Metropolitan Transportation Plan) to reflect the design of the Preferred Alternative for the proposed SR 509: Corridor Completion/I-5/South Access Road Project. The refinement to Destination 2030 has been submitted to FHWA for approval. Reference to approval by EPA has been removed from the EIS.

Response A3-17

Please see responses to Comment A1-7 from the U.S. Department of the Interior and Comment A3-1 and A3-6 above.

Response A3-18

The cumulative effects analysis was done in accordance Council of Environmental Quality guidelines. Resources of concern identified in the analysis are wetlands, surface water quality, and fish and fish habitat because of their heightened importance in the Puget Sound region, and on residential displacements and relocations because of their importance on a local level. Cumulative effects on wetlands, surface water quality, and fish and fish habitat were evaluated based on stream basin boundaries. Cumulative relocation effects were evaluated for the cities where the SR 509 project would be located. Impact numbers associated with the Sea-Tac Airport master plan improvements have been updated.

incorrect and out of date) which does not reflect the actual impact of the SeaTac projects on the creeks' water quantity and quality. It is difficult to do a cumulative analysis, but given that the RDEIS identifies 8 large projects expected in this area, please attempt to discuss their anticipated cumulative impacts upon water quality, fish, and fish habitat seems warranted.

To address the secondary and cumulative impacts, we suggest five main points for review:

**A3-18
(cont.)**

- Identify resources of concern, for example, those that will be significantly impacted.
- Perform an in-depth cumulative impacts analysis only on those resources that are significantly impacted or those that contribute to a broader ecosystem effect.
- The analysis must include a baseline with an explanation as to why that baseline was selected.
- The outputs of the analysis must be interpreted in terms of impacts to affected resources.
- When cumulative impacts occur, and mitigation is proposed, clearly state the lead agency's mitigation responsibilities and the mitigation responsibilities of other agencies.

In addition, we stress that cumulative impacts analyses must be more than a list of planned development in the project study area, and we urge FHWA to use existing data sources to assess cumulative impacts.

SUPPLEMENTAL ROAD ALIGNMENTS AND EFFECTS OF ADDITIONAL CAPACITY

1) The RDEIS is not clear as to the purpose and intent of supplemental road alignments associated with the proposed project.

A3-19

A map (Figure 2.3-7, page 2-26) of proposed activities within the RDEIS shows a spur that extends south onto Military Road. The purpose of this spur is not clear in the RDEIS.

A3-20

The FEIS should disclose if the SR-516 Interchange and S. 228th St. Extension are being proposed as active elements for consideration within the proposed action plan. This extension has been proposed in previous draft designs and is currently referenced on WSDOT's website for this project. If the interchange and extension are active elements of the proposed project, what are its purposes?

A3-21

Also, the FEIS should address the secondary environmental effects of additional road capacity, especially for these supplemental alignments that provide additional capacity into the Green River Valley and associated communities (i.e., Kent).

Response A3-19

The segment of roadway is the northernmost segment of a collector/distributor lane along I-5. The I-5 collector/distributor lanes are described in Section 2.3.2, *Features Common to All Build Alternatives, I-5 Improvements*.

Response A3-20

SR 516 interchange improvements and connection to the South 228th Street extension are part of the Proposed Action and are described in Section 2.3.2, *Features Common to All Build Alternatives – I-5 Improvements*. Improvements would be made to the ramps at SR 516 to alleviate conflicts between merging and exiting traffic. The South 228th Street extension from Military Road and I-5 underpass would provide a direct connection to the northbound and southbound collector/distributors to South 228th Street. The extension of South 228th Street to Military Road is not included in the SR 509 project. It is a City of Kent project, evaluated in a separate SEPA document.

Response A3-21

The proposed improvements to the ramps at SR 516 and the connection to the South 228th Street extension would not provide additional capacity into the Green River Valley, although they would increase the efficiency of traffic operations. Please see response to Comment A3-20 for a description of these improvements.

STORMWATER

A3-22 1) The FEIS should disclose potential cumulative effects of stormwater discharges by multiple projects (i.e., proposed construction of the third runway, South Access Road, and the proposed SR-509 extensions) into the Des Moines Creek, a 303(d) listed waterbody

A3-23 2) The FEIS should disclose direct and indirect impacts to all waterbodies, especially impaired waterbodies, during construction.

Environmental Justice and Tribal Consultation

1) According to Executive Order 12898, the FEIS should disclose what efforts were initiated to ensure effective public participation, access the information, and what was the outcome. Also, it is EPA's position that the identification of potential impacts and mitigation measures, developed in consultation with the minority and/or low income populations, must be included in the EIS to meet the direction of Executive Order (EO) 12898 (*Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*) and the accompanying memorandum from President Clinton to the heads of all Departments and Agencies.

A3-24 While the RDEIS does have sections on relocation and social issues, it is not clear how the affected community is responding to the proposed project. The lead agency and project proponents should develop effective public participation strategies and assure meaningful community representation in the process. Therefore, the Environmental Justice analysis presented in the FEIS should include the following three major components:

Description (including maps) of all low income and people of color communities in the area that would be impacted by the proposed project

A3-25 This should include a description of the methodology and criteria utilized for identifying the low income and people of color communities, the sources of data utilized for these analyses, and references utilized for establishing the criteria. Note: If 1990 U.S. Census data is utilized, the FEIS needs to discuss any short falls that may result from utilizing this data set, and/or what steps were taken to assure the data is still appropriate for 2001 analyses.

Comprehensive accounting of all the impacts on low income and people of color

A3-26 The identification of impacts needs to include (and not limited to) cumulative and indirect impacts, exposure pathways unique to the impacted communities, historic exposures, and impacts to cultural, historic and protected resources. In addition, the FEIS needs to determine if the impacts on the low income and people of color communities will be

Response A3-22

Cumulative effects on Des Moines Creek are discussed in Section 3.17.2, *Cumulative Impacts – Surface Water Quality*.

Response A3-23

Direct and indirect impacts on waterbodies during construction are described in Section 3.5.5, *Water Quality - Construction Activity Impacts and Mitigation*.

Response A3-24

Please see the revised Outreach to Minority and Low-Income Populations section in Appendix F, *Environmental Justice*, for a summary of the public involvement activities to date and discussion of public response towards the project.

Response A3-25

Please see the Affected Environment section of Appendix F, *Environmental Justice*, for a description (including maps) of the distribution of minority and low-income populations in the study area.

Response A3-26

In response to Executive Order (EO) 12898, the U.S. Department of Transportation (DOT) drafted an Order to Address Environmental Justice in Minority Populations and Low-Income Populations (DOT Order 5610.2). FHWA issued a corresponding order (FHWA Order 6640.23) establishing policies and procedures for FHWA to use in complying with Executive Order 12898 and DOT Order 5610.2. The environmental justice analysis documented in the SR 509: Corridor Completion/I-5/South Access Road EIS was conducted in conformance with the requirements of FHWA Order 6640.23.

Since publication of the Revised DEIS, additional supplemental information has been incorporated to support the conclusion of the environmental justice analysis that there would be no high or adverse impacts falling disproportionately on minority and/or low-income populations. Please see Appendix F for the updated analysis.

A3-26
(cont.)

disproportionately higher those impacts on non-low income and non-people of color communities. For such a determination, the FEIS must identify a reference community and provide a justification for utilizing this reference community. This justification should include a discussion of the methodology for selecting the reference community.

Identification of disproportionately high and adverse effects to the low income and people of color communities

A3-27

The EIS must demonstrate that communities bearing disproportionately high and adverse effects have had meaningful input into the decisions being made about the project. The EIS needs to provide a discussion on what was done to receive input from the effected communities (notices, mailings, fact sheets, briefings, presentation, exhibits, tours, news releases, translations, newsletters, reports, community interviews, surveys, canvassing, telephone hotlines, question and answer sessions, stakeholder meetings, and on scene information), what the input was, and how that input was utilized to shape the final outcome of the project. This discussion should include what mitigation measures will be put in place to address the affected public's concerns.

A3-28

2) The FBIS should disclose final consultation efforts and their results with affected tribes for compliance with Executive Order 13175 since the RDEIS states that "consultations with Tribes has not yet resulted in the identification of traditional cultural properties."

For assistance, EPA Region 10 does have a defined Tribal Consultation Process which states that "consultation" means the process of seeking, discussing, and considering the views of federally recognized tribal governments at the earliest time in the decision-making process. Consultation generally means more than simply providing information about what the agency is planning to do and allowing comment. Rather, consultation means two-way communication that works toward a consensus reflecting the concerns of the affected federally recognized tribe(s).

Response A3-27

The environmental justice analysis concluded that this project would not result in high or adverse effects falling disproportionately on minority or low-income populations. Please see the revised Outreach to Minority and Low-Income Populations section in Appendix F, *Environmental Justice*, for a summary of the public involvement activities to date and a discussion of public response towards the project.

Response A3-28

Consultation efforts with affected tribes have been completed and are described in Section 3.12, *Historic and Archaeological Resources*, and Appendix G, *Section 106 Coordination and Consultation with Affected Tribes*.

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

P.O. Box 47600 • Olympia, Washington 98504-7600
(360) 407-6000 • TDD Only (Hearing Impaired) (360) 407-6006

APR 22 2002

April 12, 2002

Mr. John White
Washington State Department of Transportation
6431 Corson Avenue South, MS-61
Seattle, Washington 98108

Dear Mr. White:

Thank you for the opportunity to comment on the "Revised Draft Environmental Impact Statement for the SR-509 Corridor Completion/I-5 South Access Project" (RDEIS), and for extending the agency comment period to April 12th. We have the following comments on the RDEIS.

Wetlands:

A4-1

The Department of Ecology provided written comments on the preliminary RDEIS document in January. The concerns that were raised in the January memo have been addressed. We did comment in January that the mitigation measures section of the document (3.6-4) should provide additional information on the state guidance for using preservation as mitigation. However, in the RDEIS the reference to preservation has been removed. We want to make it clear to DOT that Ecology's January comment did not suggest that preservation should not be allowed for this project. Ecology does allow preservation for mitigation in the right circumstances as is clearly defined in the February 2000 Alternative Mitigation Policy Guidance.

Water Quality:

A4-2

Ecology's remaining concern with the RDEIS is in the stormwater design and cost estimates reflected in the document. We have discussed our concerns with DOT in a meeting on March 15th where Ecology explained that the costs quoted in the RDEIS were significantly higher than what Ecology estimated in a quick calculation. It was explained to the stormwater engineers for this project that the design criteria used for this project went beyond the Ecology manual recommendations, therefore resulting in higher costs. The water quality information in the document does not provide enough detail for Ecology to determine if the stormwater treatment for this project will result in compliance with the Water Quality Standards as required by the pending 401 Water Quality Certification. It is important to note for permitting purposes that DOT can not discharge any parameter that is listed on the 303(d) list for waters in the project area.

A4-3

In order to address our remaining concerns with the RDEIS, Ecology has agreed to work with DOT on a Value Engineering study for the SR-509 project to prepare a refined stormwater management plan that meets Ecology's permitting requirements.

Response A4-1

Thank you for your comment.

Response A4-2

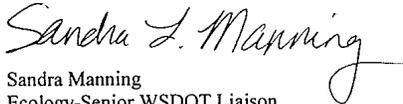
Please see response to Comment A1-2 from the U.S. Department of the Interior pertaining to stormwater design costs, and Comment A3-5 from EPA pertaining to protection of 303(d)-listed waters.

Response A4-3

We thank the Department of Ecology for their participation in the stormwater VE study.

If you have any comments or questions, please do not hesitate to let me know. You can reach me at 360.407.6912 or via e-mail at sman461@ecy.wa.gov.

Sincerely,



Sandra Manning
Ecology-Senior WSDOT Liaison

Cc: Ecology - Bill Moore, Sarah Suggs
WDFW - Cynthia Pratt
USFWS - Emily Teachout
NMFS - Barb Woods
Corps - Anne Robinson
EPA - Tom Connor

A5



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way N - Olympia, Washington 98501-1091 - (360) 902-2200, TDD (360) 902-2207
Main Office location: Natural Resources Building - 1111 Washington Street SE - Olympia, WA

March 22, 2002

John White, P.E.
Washington Department of Transportation
6431 Corson Avenue South
Seattle, Washington 98108

MAR 26 2002

Dear Mr. White:

SR 509: Corridor Completion/I-5/South Access
Road Revised Draft Environmental Impact
Statement (RDEIS)

Thank you for allowing the Washington Department of Fish and Wildlife to comment on the SR 509 Corridor RDEIS. We have the following comments.

Our agency has been involved in the 404 Merger Agreement Process as a Signatory Agency Committee (SAC) representative. There have been substantial positive changes to the RDEIS and our agency is appreciative of the work the project leaders have made to address environmental issues.

General Comments

A5-1

WDFW supports the selection of alternative C2 as the preferred alternative, due primarily to its having considerably less wetland impacts and less impacts on the vegetative community.

Specific Comments

A5-2

Specifically:

1. Disagree with the second paragraph, last sentence on p. 3-142. The potential (and likely) adverse impacts on fish habitat have been substantially understated. Adverse impacts include those from both construction and operation on spawning and rearing habitat downstream of the project area in all drainage basins which will receive stormwater from the project. Stormwater discharges from the project area will adversely affect both water quantity and quality, unless there are appreciable levels of infiltration and retrofitting of existing roadway surfaces included in the project.

Response A5-1

Thank you for your comment.

Response A5-2

Since publication of the Revised DEIS, the stormwater design for the project has been revised to include infiltration wherever subsurface conditions allow. Where infiltration is not practical, stormwater runoff would receive enhanced treatment after detention, in most areas. Please see responses to Comments A1-4 from the U.S. Department of the Interior and Comment A3-5 from the Environmental Protection Agency. During construction, WSDOT will implement best management practices and monitor stream conditions to minimize impacts on water quality.

Mr. John White, P.E.
Washington Dept. of Transportaton
March 22, 2002
Page 2

A5-3

2. Disagree with last paragraph, first sentence on p. 3-142. It is very optimistic to expect construction impacts on water quality to be negligible. From WDFW's experience, impacts of large roadway projects have been known to be severe even when the best control methods have been used.

A5-4

3. Any work "that will use, divert, obstruct, or change the natural flow or bed of any of the salt or fresh waters of the state" will require a Hydraulic Project Approval from the Washington Department of Fish and Wildlife. Please contact Mr. Larry Fisher, Area Habitat Biologist, in our Region 4 Office.

4. 3. If a Hydraulic Project Approval is required for any additional work not included in the EIS, additional mitigation for that work may be necessary.

Thank you for the opportunity to comment. If you have additional questions about our comments, or need more information, please contact Mr. Fisher at (425) 649-7042.

Sincerely,



Cynthia R. Pratt
SEPA/NEPA Coordinator
Regulatory Services Section
Habitat Program

cc: Larry Fisher, AHB, Reg. 4
Gayle Kreitman, Regulatory Services

Response A5-3

Although erosion and sedimentation controls would be implemented to protect water quality during construction, it is acknowledged that some temporary impacts would occur.

Response A5-4

Required permits and approvals for the project, including Hydraulic Project Approval, are listed in the Fact Sheet, Summary, and Appendix A of the EIS.

A6



Post-it* Fax Note	7671	Date	3/26	# of pages	9
To	JOHN WHITE	From	KING CUSHMAN		
Co./Dept	PSDOT	Co.	PSRC		
Phone #		Phone #	206 464-6174		
Fax #	768-5899	Fax #			

March 25, 2002

Mr. John White, P.E.
Project Engineer
Washington State Department of Transportation
6431 Corson Avenue South, MS 61
Seattle, WA 98108

Re: Comments on Revised Draft Environmental Impact Statement for
SR 509 - Corridor Completion/I-5/South Access Road

Dear Mr. White:

The Puget Sound Regional Council appreciates the opportunity to comment on the Revised Draft Environmental Impact Statement (RDEIS) for the SR 509 Corridor Completion/I-5/South Access Road project. The lead agencies are to be commended for an enduring long-term commitment to this important regional project over the many years it has gone through its planning and environmental review process. The RDEIS does a good job of documenting both the extensive analysis of many alternatives and the involvement of an Executive Committee, a Steering Committee, and many public forums and coordinating meetings.

The following six comments relate to aspects of your RDEIS.

A6-1

1. **High Marks for HOV Components** - The region's adopted transportation plan, *Destination 2030*, places high priority on completing missing freeway links and key components of the regional high occupancy vehicle (HOV) system, both of which are part of the SR 509 project. In joining two critical existing HOV system links (I-5 and the northerly portion of SR 509), the SR 509 project offers effective and seamless HOV connectivity by its inclusion of the direct HOV freeway-to-freeway connection where SR 509 meets I-5. This vital facility connection will support essential future transit services in the SR 509 and I-5 corridors.

A6-2

2. **Note on Air Quality Maintenance Area** - Although it doesn't affect your findings, a statement in the current RDEIS has been false since 1993 and warrants correction in the final EIS:

“ . . . even though the build alternatives are outside the Puget Sound vehicle Inspection and Maintenance (I&M) Program area . . . ” (Chapter 3, page 3-7, second paragraph)

All portions of urbanized King County are in the designated air quality “maintenance” area and are subject to the air quality vehicle inspection program.

Response A6-1

Thank you for your comment.

Response A6-2

The text has been corrected to indicate the project is located in the designated air quality maintenance area.

John White, P.E., Project Engineer
SR 509 Comments
March 25, 2002
Page 2

A6-3

3. **Airport Statistics & Aviation Security** - We suggest that you include the latest airport activity statistics in the Final EIS. On page 1-5, wherein you cite figures for 1997 and 1998, you might also note that total passenger traffic for 2001 was 27,036,074.

Relative to potential airport impacts, we feel it is appropriate to reiterate two points we know you are aware of and have addressed in the RDEIS, but which will deserve a final review once the project advances to final design. These are:

A6-4

- (1) Assuring that the selected project alternative minimizes encroachment on critical FAA safety areas (*Runway Protection Zone, Object Free Area, Extended Object Free Area, Controlled Activity Area, and Runway Safety Area*); and
- (2) Assuring the final project alignment minimizes impacts on future development of the proposed Port of Seattle's South Aviation Support Area (SASA).

A6-5

The FAA and the Port of Seattle raised these issues during your project planning and EIS process and it appears these were resolved in the way you balanced safety/security issues against other important project concerns in the corridor, such as impacts on Des Moines Creek, Des Moines Creek Park, related wetlands, and existing land uses. However, as the September 11th tragedy renewed many airport area safety concerns, the security issue of public rights of way (highway and trail) through Sea-Tac Airport's Runway Protection Zone (RPZ) may warrant a final review as the project's final design is prepared.

Your FEIS could better show how you have addressed the aviation safety issue by reflecting the physical relationships between the project alternatives and critical FAA safety zones in the Final EIS. An integrated overlay map would better show the how the final preferred project alternative relates to the FAA safety zones on a common map.

A6-6

4. **Improve Display of Impacts with Improved Maps** - The document could do a much better job of overlaying the alternatives with all of the "environmental factors" that are shown on page 2-6. The primary maps of the alternatives do not show these important factors. Figure 4.2-1 does show the alternatives on a map showing Des Moines Creek Park, but the scale of the map and the shades of gray used to differentiate the alternatives make the map difficult to read.

A6-7

5. **Note on Role of Destination 2030** - On page 3-173, paragraph 1 incorrectly states "Destination 2030 does not replace Vision 2020 or the 1995 MTP...." Actually, *Destination 2030* did replace the 1995 MTP though not VISION 2020.

A6-8

6. **Regional Air Quality Conformity Testing and Revised Project Description Needed for Final Preferred Alternative in FEIS** – A last comment we offer is to share our most recent

Response A6-3

The text has been revised to indicate the number of passengers who traveled through Sea-Tac Airport during 2001.

Response A6-4

Thank you for your comment.

Response A6-5

The Port of Seattle is a cooperating agency on the project. Port representatives are members of the project Steering Committee and Executive Committee. Development and refinement of the project alternatives have been conducted in cooperation with the Port and FAA. Please refer to Chapter 2 for a discussion of coordination with FAA.

Alternatives C2 and C3 pass through the southern one-third of the extended object free area. There is no other encroachment on FAA safety zones. Alternative B is outside all FAA safety zones. FAA safety zones have been added to Figures 2.3-6, 2.3-7, and 2.3-8. Please refer to Chapter 2 for a description of the project alternatives.

Response A6-6

The scale of Figure 4.2-1 has been increased. Figures showing the relationship of each alternative to the various disciplines are provided in their respective sections – historical and archaeological resources are in Section 3.12; wetlands are in Section 3.6; streams are in Section 3.5; hazardous waste sites are in Section 3.13; and 4(f) properties (including Des Moines Creek Park) are in Chapter 4.

Response A6-7

The text of the EIS has been revised.

Response A6-8

The proposed project design was included as project WDOUM-6 in the Regional TIP and Metropolitan Transportation Plan as revised in June 2002. The inclusion in the plan and program, demonstration of conformity for the plan and program, and FHWA policy on inclusion in the plan and program are discussed in Section 3.1.4 of the EIS.

John White, P.E., Project Engineer
 SR 509 Comments
 March 25, 2002
 Page 3

A6-8
 (cont.)

understandings about guidance from the USDOT's Federal Highway Administration (FHWA) on the need to test final project refinements on major regional corridor projects for regional air quality conformity. The FHWA has indicated that they need to know that your final preferred alternative, as ultimately constituted with any potential refinements that might arise after your complete your review of all RDEIS comments, satisfactorily "conforms" to regional air quality testing as a project in our region's adopted plan. This means that, upon completion of your review of all RDEIS comments, and after making any final refinements to the preferred SR 509 project alternative to be recommended in the FEIS, you should request that the Regional Council (1) conduct a regional air quality conformity test of the final preferred alternative, and (2) modify the Candidate SR 509 corridor project description in *Destination 2030*.

You should be aware that some of the project's details now included in your RDEIS preferred alternative for SR 509 were uncertain at the time *Destination 2030* was finalized and adopted in May 2001. The key differences we've noted seem to be additional lanes proposed to be added on I-5 south to enable the transition and merge of traffic between SR 509 and I-5. Any such improvements that differ from the current general Candidate SR 509 project description in *Destination 2030* will have to be identified and submitted to the Regional Council for regional air quality conformity testing and to request a project description change in Appendix 9 of *Destination 2030*. Our Executive Board is authorized to make such revisions upon concluding that the preferred alternative meets air quality conformity requirements and is consistent with adopted regional policies.

Next Steps to Advance SR 509 to Approved Status in *Destination 2030*

The following discussion is not about comments on your RDEIS, but is offered as advisory notes to help you prepare to advance the SR 509 project to Approved status in *Destination 2030*. In May 2001, the Puget Sound Regional Council adopted a new regional transportation plan – *Destination 2030*. This plan included guidance for capacity investments that categorizes all regionally significant improvements as either Candidate or Approved (please refer to the enclosed Appendix 6 of *Destination 2030* for a more detailed explanation of these distinctions). The SR 509 project is included in *Destination 2030* as a Candidate project (listed as project #1613). A Candidate project must satisfactorily address Approved project criteria before being designated as Approved in *Destination 2030*. Approved status is required before the project is eligible for programming action in the Regional Transportation Improvement Program (TIP) for implementation (i.e., right-of-way acquisition and construction, including final design).

Destination 2030 includes a policy that enables the Executive Board to authorize a change in status of regionally significant projects from Candidate to Approved. Listed below is a summary of the Appendix 6 requirements for moving a project such as SR 509 from Candidate to Approved status.

1. Regional Council staff review and determine consistency of the project's final preferred alternative with *Destination 2030* policies

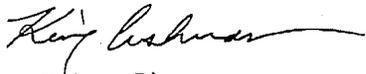
John White, P.E., Project Engineer
 SR 509 Comments
 March 25, 2002
 Page 4

2. Sponsor provides documentation for completed benefit cost analysis
3. Environmental documentation is completed and submitted with sufficient detail as to the final nature, character, components or design of the given project or program to determine regional policy consistency
4. Sponsor satisfactorily addresses any other planning requirements which might have been specified by the Regional Council's Executive Board for a given project
5. Sponsor submits financial plan demonstrating project feasibility by showing how the entire corridor project or its individual project components are to be funded
6. The Regional Council must test and make a positive regional air quality finding if such project was not previously included and tested in the form of its final preferred alternative in the adopted regional plan's air quality conformity process

To be eligible for programming actions in the Regional TIP for construction and right-of-way phases, all regionally significant projects such as SR 509 need to satisfy the above requirements and be designated as Approved projects. When the Candidate project(s) included in this RDEIS have met the above requirements, the project sponsor(s) may request the Regional Council to change the project and associated supporting projects to Approved status.

If you have questions about any of our comments in this letter, please contact me at (206) 464-6174 or contact Kevin Murphy at (206) 464-6411. We thank you and your study team for the significant work done to continue to advance this very important regional project.

Sincerely,



King Cushman, Director
 Transportation and Growth Planning

Enclosure: Appendix 6 of *Destination 2030*

cc: David Dye, Administrator, WSDOT Urban Corridors Office
 Charlie Howard, Director, WSDOT Planning and Policy Office
 Kevin Murphy, Program Manager, PSRC
 Norman Abbott, SEPA Official, PSRC

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APPENDIX G

**guidance for plan amendment
and capacity investment decisions****Plan Amendment Process**

Destination 2030 is a long-range, 30-year planning document. It is prepared in a dynamic environment involving continuing change in regional population, housing, employment, land-use, and technology. Change in any environment is inevitable. Revenue sources may become available or may be discontinued. Cost assumptions may need to be adjusted. Therefore, periodic amendments to *Destination 2030* will be necessary.

Destination 2030 is prepared in accordance with state and federal requirements. Federal statutes require that the plan be reviewed every three years for effectiveness and viability, and that a new plan be prepared or the existing plan be updated.

The Clean Air Act Amendments of 1990 require that regional transportation plans be prepared in conformity with the State Implementation Plan for air quality planning and monitoring purposes. A new conformity statement must be prepared whenever *Destination 2030* (the region's metropolitan transportation plan) or the short-range Transportation Improvement Program is amended. If amendments to the Plan or Program do not affect air quality, a new conformity statement may not be required. However, this is not clearly stated in federal statutes, and it may be necessary to prepare a conformity statement no matter how minor the amendment to the Plan or Program may be.

Recognizing the need for amendments, the Regional Council is committing to a major amendment of *Destination 2030* every three years to coincide with federal requirements, including preparation of a conformity statement. In addition, depending on the scope and magnitude of the major amendment, the Regional Council may conduct environmental review as required by the State Environmental Policy Act (SEPA), in the form of a new Environmental Impact Statement, an Amendment or Addendum to the original Environmental Impact Statement, or a Declaration of Non Significance (DNS).

Minor amendments that clearly have no impact on regional air quality will be processed on an as-needed basis if Executive Board review of the proposed amendment results in a Declaration of Non Significance under SEPA.

Washington State legislation for regional transportation planning organizations requires that RTPOs review their regional transportation plans every two years, and forward the adopted plan, along with documentation of the biennial review, to the Washington State Department of Transportation (Chapter 47.80, Revised Code of Washington). To address both federal and state requirements for reviewing and updating the region's metropolitan transportation plan, the Puget Sound Regional Council will report to WSDOT on *Destination 2030* every two years. This reporting will then provide the basis for identifying issues to be addressed in the three-year update of *Destination 2030* required by federal law.

Guidance for Major Capacity Investments

Major capacity investments are needed on a number of regional facilities. Reaching agreement upon the type, design, and implementation of significant capacity investments is a challenging and important process. Where regional capacity needs have been identified, but where specific project or program details are not yet determined, the following framework establishes guidance for final investment decisions.

A CORRIDOR APPROACH

Transportation facilities do not exist in isolation, but are part of larger regional and state systems. Just as these corridors do not sit in geographic isolation, they also constitute elements of many different regional transportation modal systems. Multimodal analysis of corridor level investments is an essential part of making sure the regional system needs are fully identified. The long-term performance of these facilities is also heavily dependant upon surrounding land uses. As a result, evaluating transportation investments within the context of an entire transportation corridor may lead to a more comprehensive approach to problem solving. The objective of corridor-based analysis is to identify an effective mix of strategies, selected from a full range of capacity and system management approaches, that can demonstrate measurable results and that are consistent with the objectives of local and regional growth plans.

IDENTIFYING, MINIMIZING, AND MITIGATING IMPACTS

Destination 2030 incorporates previous Regional Council policy commitment to pursue and help achieve reasonable mitigation of impacts on communities resulting from major transportation facility and service investments/improvements that are either regionally significant or of statewide significance. Such projects should seek reasonable mitigation for impacts upon local communities that may result from project development. Implementation strategies to achieve this objective may include, but may not be limited to, priority programming of transportation investments that could help mitigate such community impacts, and pursuing state or federal legislative support for funding to help mitigate such community impacts.

MAJOR PROJECT RECORDS OF AGREEMENTS

Corridor level records of agreement should be encouraged, where appropriate, for large major corridor projects, whether they be freeway, transit or ferry. Records of agreement would document actions that will help successfully implement the preferred alternative that resulted from the environmental and public review process. Such agreements should be prepared by project sponsor leads at the conclusion of environmental decisions on selected major corridor projects, and should be regionally coordinated to help assure effective follow-up in regional performance monitoring of plan implementation activity.



EVALUATING BENEFITS AND COSTS

Regional Transportation Planning Organizations are required (RCW 47.80.030) to apply least-cost planning analysis to alternative transportation investment strategies. Within the Washington Administrative Code (WAC 468-86-030 and WAC 468-86-080) least-cost planning is defined as "a process of comparing direct and indirect costs of demand and supply options to meet transportation goals and/or policies where the intent of the process is to identify the most cost-effective mix of options." Least-cost planning attempts to consider all of the reasonably identifiable resource costs associated with alternative investments, and to provide relevant information as input to regional transportation plan investment selection and prioritization.

Destination 2030 utilized least-cost planning analysis as input to regional decision processes. In addition, all major "Candidate" projects (defined further below) must conduct and document an enhanced benefit-cost analysis (appropriate to the scale and complexity of the study) that considers reasonable full public and private costs of transportation in its environmental analysis leading to a decision on a preferred alternative or option. In combination, regional least-cost analysis at the programmatic level, and project or corridor level benefit-cost analysis constitute a least cost planning methodology for regional plan refinement and development.

FINANCING PLAN

Major transportation projects need to demonstrate that they can be reasonably funded. Large projects often require funding that spans many years and multiple funding sources. A project level financing plan describes the manner by which the entire project may be completed, ensuring that initial funding will eventually result in a fully implemented project. Consistent with the recommendations from the Transportation Pricing Task Force major investments in new capacity should evaluate a self-financing approach. Understanding the viability of self-financing through user fees is a reasonable test of whether benefits from investments are on the same scale as costs, even if self-financing is not pursued for other policy reasons.

CANDIDATE/APPROVED PROJECT STATUS

Destination 2030 includes a process to classify regional projects and programs as either "Candidate" or "Approved." Candidate major investments are projects or program components occurring on regionally significance facilities (on the Metropolitan Transportation System), but which have one or more planning requirements that must be satisfactorily addressed before they are eligible to be formally approved in the region's metropolitan transportation plan for implementation. All of the projects contained in Appendix 9 (Projects on MTS Facilities) have satisfied the Candidate Project Criteria (see below). A Candidate project must satisfactorily address Approved Project Criteria before it can be redesignated as Approved in *Destination 2030*, which then enables a project to be eligible for implementation. Projects designated in *Destination 2030* as Approved are then eligible to be included in the regional Transportation Improvement Program (TIP) for full project action/implementation phases such as final design, right-of-way acquisition and construction. Reclassifying a Candidate project as Approved occurs as a result of a majority vote of the Regional Council's Executive Board.

The Regional Council will respect the many complex requirements and due public processes that local, regional and state agencies must go through to enable their project to achieve Approved project status in the adopted regional transportation plan. Therefore, the Regional Council will only revisit or reconsider Approved status if a major project sponsor finds that significant conditions have conclusively changed, and which cause the project sponsor to be incapable of continuing implementation in the general manner by which it was originally approved.



Candidate Projects: This category of projects/programs identifies those transportation investments being proposed to respond to some identified transportation problem or deficiency where the specific design character or nature of the project or program solution is yet to be resolved. The development of a final resolution of how a project or program will be developed is achieved through formal state or federal planning and environmental review processes. Projects included in *Destination 2030* Appendix 9, unless they are designated as Approved, are only eligible for TIP funding to conduct planning, environmental or preliminary engineering phases which lead towards resolution of how it will be proposed to be developed in a final public decision process.

Candidate Project Criteria

The following three criteria have been met by all projects or programs included in *Destination 2030* Appendix 9. Any new project proposals must satisfy these Candidate Project Criteria in order to be included in future amendments to *Destination 2030*, and included in Appendix 9:

1. The proposed project/program is part of the Metropolitan Transportation System and falls under the definition of a regionally significant project/program as noted in state law under RCW 47.80.030.
2. The proposed project/program has been endorsed by its sponsor and forwarded to the Regional Council for inclusion in the *Destination 2030*.
3. The proposed project/program has been derived from one of the following types of comprehensive planning processes:
 - An approved local comprehensive plan developed under the state Growth Management Act (where a city or county is the project/program sponsor).
 - An approved public transit short- or long-range plan (where a transit agency/operator is the project/program sponsor).
 - WSDOT's approved State Transportation System Plan (where the state is the project/program sponsor).
 - An approved capital improvement plan or program of another agency not noted above (e.g., where a port or special purpose transportation agency is the project/program sponsor).
 - A regional planning process conducted as part of the region's unified planning work program that supports implementation of the region's policies for transportation, development and/or economic strategies (where the Regional Council is the sponsor).

Approved Projects: This category of projects/programs identifies regionally significant transportation investment proposals that have met all of the above-noted criteria, have completed their formal planning, environmental review and decision process, and have been found consistent with *Destination 2030* and/or its policies.

Approved Project Criteria

For projects to be designated as Approved, all of the following applicable criteria must all be met:

- The sponsoring agency has documented completion of appropriate public and environmental review processes and has made a decision on the final nature, character, components or design of the given project or program.
- Any other additionally required planning process requirements or conditions have been completed by the sponsor to conclude its candidate status.
- The proposed project/program, if involving measurable air quality impacts, has been successfully tested in the region's transportation and air quality models for systemwide mobility and found to comply with state and federal air quality conformity requirements.



APPENDIX 9: GUIDANCE FOR PLAN AMENDMENT AND CAPACITY INVESTMENT DECISIONS

AS-4

- The proposed project/program has been found to be consistent with the policies of VISION 2020 and *Destination 2030*.
- The project or program has conducted and documented an enhanced benefit-cost analysis (appropriate to the scale and complexity of the study) that considers reasonable full public and private costs.
- A specific funding source has been identified and proposed for the project or program (naming at least the specific type of revenue source(s) and whether such revenues are projected to be coming from local, regional, state, federal, or private sources).

The Regional Council will develop administrative procedures to evaluate the manner in which projects satisfy the above criteria.





February 25, 2002

Serving the Southwest Metropolitan Area since 1946

FEB 26 2002

Mr. John White, Project Engineer
 Northwest Region Design, South King Area
 6431 Corson Avenue S, MS 61
 Seattle, WA 98108

Subject: SR 509 Revised Draft EIS Statement and Draft Section 4(f) Evaluation

Dear Mr. White:

Thank you for the opportunity to comment on the *Revised Draft Environmental Impact Statement and Draft Section 4(f) Evaluation (RDEIS)* for the SR-509 project. The District understands the need for this project and believes it will significantly improve the flow of traffic in our region.

A7-1

The District has several comments related to how this project will impact the quality and flow of groundwater during the construction and upon project completion. While the RDEIS states that water quality issues will be addressed through the use of applicable BMPs, there is no specific discussion on water quantity. The District is specifically concerned how the project may impact not only the water quality of our Angle Lake, Des Moines and Tyee Wells, but also how the removal of approximately 4 million cubic yards of material will impact the infiltration and flow of groundwater around the wells.

A7-2

The District is concerned about how WSDOT will address water quality and flow data as the project progresses. At the bottom of Page 3-63 it states "No water quality or flow data were collected" as part of this project. We would like to know more about what hydrogeological tests or studies will be undertaken as this project proceeds. We would also request that the District be involved in the process of discussing these results before any final decisions are made.

A7-3

Page 3-82 and Page 3-95 indicate there is "no aquifer protection plan for the Angle Lake Well, the protection plan of the wellhead area is in a 5-year development phase and is not yet finalized (Johnson pers. Comm. 2000)". The District would like to clarify that we do have an active wellhead protection program that has been designed in accordance with Department of Health standards. We are unaware of Mr. Johnson's efforts to complete a 5-year development phase, but the District would be more than willing to assist with this endeavor. The District also observed that the preferred alternative appears to be located adjacent to the Angle Lake Well and may require additional mitigation to ensure the well is not impacted. We would like to open a dialogue with all interested parties to ensure an agreeable solution is found so the project can be designed in an efficient manner and not impact the quality or quantity of potable water from the Angle Lake Well.

A7-4

Response A7-1

The discussion of groundwater impacts in Section 3.5 has been expanded.

Response A7-2

No hydrogeologic testing is expected to be done for the SR 509 project. If such testing is done, WSDOT would coordinate with the Highline Water District regarding the results of the testing.

Response A7-3

The text has been revised to include a reference to the Angle Lake wellhead protection plan.

Response A7-4

The approximate distance of the proposed project and associated treatment facilities from the Angle Lake Well would be 250 feet. WSDOT would work with each of the well districts/owners to ensure that infiltration from the SR 509 stormwater treatment facility does not occur near these wells. This commitment assures compliance with restrictions in the Groundwater Management Protection Area (GWMA) of South King County (currently under development) and the forthcoming BMPs from the Washington State Department of Health Source Water Assessment Program (SWAP), expected in 2004. The protection of groundwater quality expected from these programs will satisfy Chapter 173-200 WAC water quality requirements.

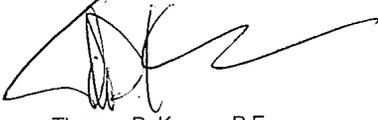
Mr. John White
February 25, 2002
Page 2

There were also several minor text corrections the District observed when reviewing the RDEIS. They are included with this letter as an attachment.

Overall, the District would like to thank WSDOT for including the District in the SR-509 design and construction issues such as the value engineering (VE) study last year. WSDOT staff has also done an excellent job coordinating the potential relocation of the District's transmission and distribution piping.

If you have any questions or need additional information related to our RDEIS comments, please feel free to contact me at 206-824-0375, x102.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Keown', with a long horizontal flourish extending to the right.

Thomas D. Keown, P.E.
Construction Services Manager

TDK:maf
Enclosure

Cc: Peggy S. Bosley, General Manager
Mike Becker, Water Quality Coordinator

General Comments for SR-509 RDEIS

A7-5

1. Please refer to the District as the "Highline Water District". In several places (pg 3-63 and pg A-6 for example) the document refers to the District as a "Department" which is not correct.
2. The District request the paragraph on "Groundwater" found on page 3-68 be replaced with the following:

A7-6

The largest municipal water user is the Highline Water District Well-Field, which draws approximately 1.5 million gallons per day of water from the deep aquifer via the Angle Lake and Des Moines production wells. A new well being refurbished, referred to as Tyee Well, is currently being rehabilitated developed for municipal use by the District on Port of Seattle (POS) property. Two additional wells are located on POS property: Well 2M, which is used for groundwater monitoring by the District, and Well 1, which is ~~not currently used for drinking water supply~~ owned by the POS

Response A7-5

The text has been corrected as suggested.

Response A7-6

The text has been corrected as suggested.

L1

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

From: Schual-Berke, Rep. Shay [mailto:Schualbe_Sh@leg.wa.gov]
Sent: Monday, March 25, 2002 2:15 PM
To: 'whitejh@wsdot.wa.gov'
Cc: Schual-Berke, Rep. Shay
Subject: RE: SR509 comments due Monday to WSDOT

John White, P.E., Project Engineer
Washington State Dept. of Transportation (WSDOT) 6431 Corson Ave S., MS 61,
Seattle, WA, 98108

Subject: Comments Submitted March 24 on SR509 Corridor Completion/I-5/South
Access Road Project to the Dept of Transportation

Dear Mr. White,

I am one of the Representatives who supported a transportation budget package that included funding for completion of the SR 509 corridor. I am writing however to stress my concerns regarding adequate environmental review and protections as required by state and federal law. I am most concerned given the history of how those protections and laws have been problematic as far as permitting for the third runway project has gone.

It will be critical to the community to know that as you assess environmental issues in this project, the cumulative impacts will be considered to this area. Both SR 509 and the potential third runway will be affecting the same wetlands, streams, salmon and people. My constituents have shared their thoughts in writing with you; I trust their questions will be taken seriously and addressed.

People who live in proximity to SeaTac airport are aware that their environment has already been compromised. Their efforts to make certain that Federal and State environmental protections are adequately enforced has successfully delayed, to date, granting of essential permits for the third runway project. I understand that completion of the SR 509 corridor is an important piece in bringing our state transportation infrastructure into the 21st century, and that it will help mitigate the congestion that is strangling freight mobility and quality of life for people. But the cumulative effects of the two projects is such that if the project does not strictly enforce environmental protections I suspect that it may become entangled in the same legal quagmire as the third runway Thank you for your consideration.

Best regards,

Shay Schual-Berke, MD
State Representative, 33rd district
Washington State
JLOB 342
Olympia, WA 98504
360/786.7834

Response L1-1

Thank you for your comment on the SR 509: Corridor Completion/I-5/South Access Road Revised DEIS. This comment stresses compliance with all state and federal laws and the need for adequate assessment of the cumulative environmental impacts in the SR 509 project area. The cumulative impacts analysis was done in accordance with Council of Environmental Quality guidelines and includes impacts associated with development of the Sea-Tac Airport Master Plan. A cumulative environmental impacts evaluation is provided in Section 3.17 of the EIS.

L1-1



L2

CITY OF BURIEN

415 Southwest 150th Street
Burien, Washington 98166-1973

Phone: (206) 241-4647
Fax: (206) 248-5539

Mayor
Sally Nelson

February 27, 2002

Deputy Mayor
David Wintermute

Councilmembers
Rose Clark
Kevin James
Stephen Lamphear
Georgette Valle
Wing Woo

John White
Project Engineer
Washington State Department of Transportation
6431 Corson Avenue South
Seattle, WA 98108

Subject: Environmental Hearing on SR 509 Corridor Completion

Dear Mr. White:

Burien is the "community with great connections". We are just 12 minutes from Seattle, five minutes from I-5 and seven minutes from SeaTac International Airport. The intersection of SR509 and SR518 serves as the main entrance to Burien. We expect the SR509 corridor extension to make our city more accessible and make it easier for people to come here to do business and to visit. Other benefits of this project are:

1. Extending this corridor will help reduce congestion in South King County by providing an alternate route to I-5 and increasing freight mobility between Seattle, King and Pierce County for marine and air cargo.
2. It will provide regional market access to Burien's commercial center and increase our ability to realize our goal for economic revitalization and downtown re-development.
3. The Washington State Department of Transportation will help us and our neighboring communities to work together to reduce impacts to our wetlands and parks, improving fish habitat, improving and expanding the off highway trails and bike paths connecting north to SeaTac, Burien, and the Duwamish bike facilities.

For these reasons, we support the SR509 extension project. With our support we ask that you consider how our community will be impacted. We also ask that the state expand its project impact to include other considerations. The overall success of the project's goals is to enhance mobility, safety and environmental conditions. To accomplish these goals we request that the project address the concerns discussed below:

L2-1

Response L2-1

Thank you for your comment.

L2-2

Future Traffic Impacts. The intersection of SR509 with SR518 is the primary entrance into our city. It is a very high accident location and operates now at Service Levels E and F—the highest rating levels for congestion. Extending the SR509 corridor will increase traffic even more and make this intersection in even greater need of improvements. We ask that you fund the design process that would implement improvements to this interchange as a phased set of improvements to be made as traffic loads increase due to the SR509 southern extension. Logic and public safety support this request. To build a freeway connection north into Burien, port, rail and Downtown Seattle and not design improvements at the SR509/SR518 interchange will be an expensive investment to improve freight mobility with marginal payback.

L2-3

Gateway Improvements. The SR509/SR518 intersection is designated as a gateway in the City’s comprehensive plan. With the extension of SR509 there will be significantly increased traffic and visibility for our city. As mitigation for the increased traffic we ask that signage, lighting and landscaping along the sides leading to the intersection, and landscaping at the intersection, be included in the budget and plans for the whole corridor. These improvements have been made on other state facilities in the region and should be made on the north end of the route extension. Burien and other nearby airport communities should be eligible for trees and additional landscaping that create a quality and inviting entrance to our cities. Burien wishes to be a partner in planning for these improvements.

L2-4

Traffic Noise Impacts on Neighborhoods. Finally, we ask that you consider the noise impacts extending this corridor will make. The corridor extension will impact our Manhattan neighborhood west of 8th Avenue South. Increased traffic, especially freight traffic, may cause much more substantial noise impacts to neighborhoods further north in the City. We request further analysis of the noise impacts to the adjacent neighborhoods both during construction and after the project is completed.

If you have questions, please call me or City Manager, Gary Long.

Thank you.


Wing Woo
Mayor

Response L2-2

Improvements to the SR 509/SR 518 interchange are included in the State Highway System Plan and are a part of Washington’s Transportation Plan. Those improvements would be pursued according to the priorities established in the Highway System Plan and the funding available. Please refer to Section 2.4 of this FEIS for a discussion of future traffic in the vicinity of the SR 509/SR 518 interchange.

Response L2-3

Landscaping, signing, and other improvements to the SR 509/SR 518 interchange should be included in the SR 509/SR 518 interchange improvement project. WSDOT will continue to work with the City of Burien on the SR 509/SR 518 interchange improvement project and will include the City of Burien in the development of visual guidelines for the SR 509 corridor.

Response L2-4

WSDOT’s Noise Policies and Procedures document was developed to provide fair and equitable coverage of noise issues from transportation sources statewide. This document was required by and has been approved by FHWA. WSDOT considers noise impacts and assesses mitigation within the project limits when there is (1) a new roadway, (2) a new through-lane on an existing roadway, or (3) a significant realignment of an existing roadway.

When any of these three scenarios occur, WSDOT conducts a noise study, assessing noise impacts and mitigation within the project limits. The areas to the north of the project and adjacent neighborhoods are beyond the project limits and will not be assessed with a full noise study. However, the department is concerned about severe noise impacts from our roadway projects. A severe impact is identified when there is a 10-decibel increase over existing noise levels for roadway operation. In order to obtain a 10-decibel increase, there must be 10 times as much traffic as the No Action Alternative. WSDOT has reviewed the traffic volumes associated with the proposed project for noise purposes and has not found an increase in traffic outside the project boundaries that would lead to such severe noise impacts.

For construction noise levels, WSDOT will follow all appropriate regulations for construction noise requirements. WSDOT will apply feasible and reasonable measures for reducing noise impacts to neighborhoods when possible, including proper placement of staging areas, time-of-day restrictions for specific construction activities, and appropriate shielding of noise sources as needed for night work.

Cc: Burien City Council
Gary Long, Burien City Manager
Scott Greenberg, Community Development Director, Burien
Steve Clark, Public Works Director, Burien
Judith Kilgore, Community Development Director, Des Moines
Mike D. Feldman, Director Aviation Facilities, Port of Seattle
Jim Leonard, Urban Transportation and Environmental Engineer, FHWA
Stephen Butler, Director of Planning, SeaTac
Paul Toliver, Director of Transportation, King County
Jerry Alb, Director of Environmental Services, WSDOT



L3

City of Burien

FEB 28 2002

415 Southwest 150th Street • Burien, Washington 98166-1973
Phone: (206) 241-4647 • Fax: (206) 248-5539
www.ci.burien.wa.us

Mayor
Wing Woo February 25, 2002

Deputy Mayor
Rose Clark Mr. John White, P.E.
WSDOT
6431 Corson Ave. South, MS 61
Seattle, WA 98108

Councilmembers
Noel Gibb
Kevin James
Stephen Lamphear
Joan McGilton
Sally Nelson
Re: SR 509 Corridor Revised Draft EIS

Dear Mr. White:

L3-1 Thank you for the opportunity for review of the Revised Draft EIS on the SR 509 Corridor project. The City of Burien supports the extension of SR 509 for the economic benefits the improved access will bring to our city, especially our downtown.

L3-2 Although the extension of SR 509 is not physically located within Burien, it will be close to our city limits, particularly the Manhattan neighborhood west of 8th Ave. South between Des Moines Memorial Drive and So. 192nd St. **The analysis of noise impacts from the project should be revised to include additional data and discussion of noise impacts on the Manhattan neighborhood both during construction and full operation of the facility.**

L3-3 The SR-509/SR-518 interchange has been identified in our Comprehensive Plan as a gateway into Burien. Policy SC 1.11 states: *"The City should coordinate the development of a "gateway" into the City in the vicinity of 1st Avenue South and the intersection of State Routes 509 and 518 with WSDOT. Consideration should be given to the impact of WSDOT highway signage on the visual character of the community."* This highly visible interchange serves as a symbol that defines Burien in the eyes of freeway users—many of whom are potential consumers of our goods and services. The proposed SR-509 extension will significantly increase the number of vehicles and people passing through the interchange. **As mitigation for the increased traffic along the freeways in Burien, we are requesting that the project budget include "gateway" landscaping and revised signing at the SR-509/SR-518 interchange.** I have enclosed several pages from our adopted "Burien Gateway Design Report" describing the concept for this landscaping and revised signing.

L3-4 The SR-509 extension project will substantially impact traffic at the SR-509/SR-518 intersection. **We request that the Department of Transportation study safety improvements to this intersection in conjunction with its plans to extend SR-509.** This interchange is the western terminus of SR-518, linking SR-518 with SR-509. The interchange is also the primary entrance to the City of Burien. Characterized as a partial diamond, the interchange provides limited freeway-to-freeway access, with most movements through signalized intersections. Currently, these intersections operate at Levels of Service E and F, and experience a high accident rate.

Response L3-1

Thank you for your comment.

Response L3-2

Please see response to Comment L2-4 from the City of Burien.

Response L3-3

Please see response to Comment L2-3 from the City of Burien.

Response L3-4

With the completion of the SR 509 corridor, the number of vehicles using SR 509 mainline near the SR 509/SR 518 interchange in the year 2020 would be more than the no build condition. However, slightly fewer vehicles would use the SR 509/SR 518 interchange to exit or enter the mainline if the preferred alternative is built than if SR 509 is not completed. Because of this, WSDOT has determined there is no impact on the SR 509/SR 518 interchange with the completion of the SR 509 corridor, and improvements to the interchange are not included in the proposed project.

John White, P.E.
February 25, 2001
Page 2

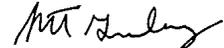
Although its function as the primary gateway to Burien will remain, its function as a connection will change and become increasingly important as the south extension of the SR-509 corridor to I-5 is completed. Similarly, improvements being studied for the Alaskan Way Viaduct and East Marginal Way corridor could link the northern end of the SR-509 corridor (1st Avenue South Bridge) directly to downtown Seattle with a fully access-controlled freeway facility. These improved connections to the regional freeway system heighten the importance of the SR-509 corridor, and place added importance on the SR-518 corridor. As such, a freeway-to-freeway connection is needed at SR-509/SR-518.

L3-5

Finally as additional mitigation for increased traffic along SR-509, we are requesting additional landscaping along both sides of SR-509. Comprehensive Plan Policy SC 1.10 states: *"The City should work with the Washington State Department of Transportation (WSDOT) to develop a planting plan distinctive to Burien for the length of State Routes 509 and 518 corridor located within the City. The plan should utilize native drought tolerant plants, shrubs and trees."* Landscaping along the freeway has helped cities such as Bellevue, Mercer Island and Olympia improve their visual image and achieve their aesthetic and economic development goals. We believe that landscaping along the length of SR-509 is one of the improvements needed to allow us to achieve our goal of a quality community.

Should you have any questions please call me at (206) 248-5510.

Sincerely,

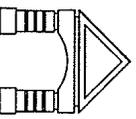


Scott Greenberg, AICP
Community Development Director

Cc: Mayor Woo and City Council
Gary Long, City Manager
Steve Clark, Public Works Director

Response L3-5

WSDOT will include the City of Burien in the development of visual guidelines for the SR 509 corridor. However, landscaping of the SR 509 corridor north of the South 188th Street interchange would not occur as part of the SR 509: Corridor Completion/I-5/South Access Road Project. Landscaping may occur when other major improvements are made to that section of SR 509 in the future.



LANDSCAPE CONCEPT

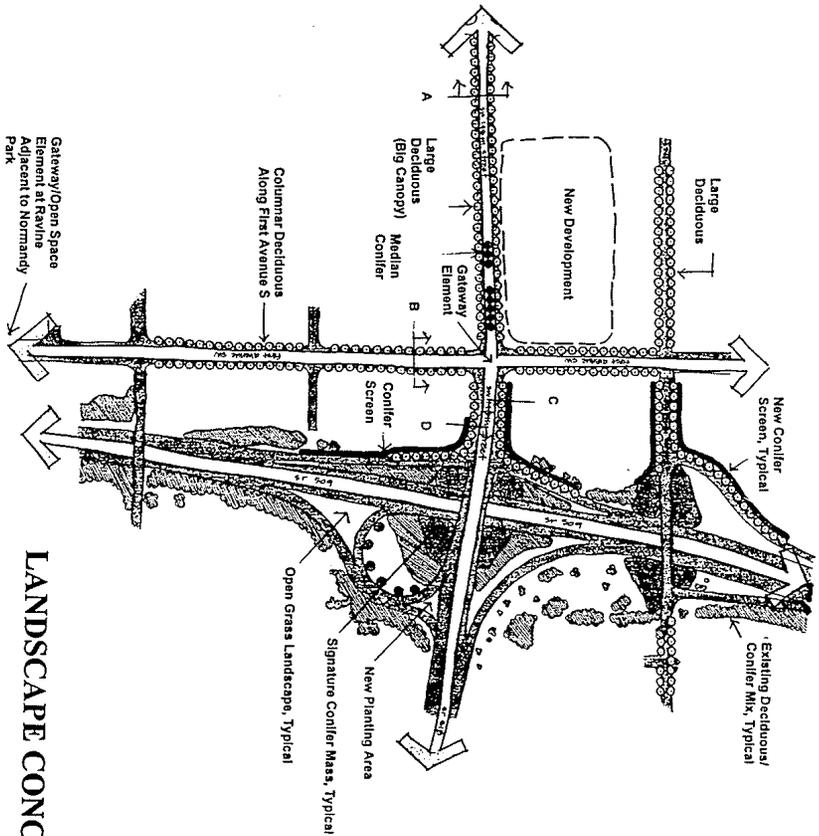
The overall Northeast Gateway landscape concept focuses on softening the environment through a simplistic design scheme that seeks to set a tone of continuity in a somewhat chaotic environment. Upon entering Burien, motorists will encounter a series of gateways progressing from naturalistic and informal features along the freeway to more formalized landscaping features along the streets. The design also seeks to provide consistent layers of colors and textures to stimulate interest, particularly involving the changing of the seasons. A major goal of developers, city officials, and property owners was to provide year-round greenery acknowledging Burien's location within the Puget Sound.

Highway landscaping beginning just to the east of the 509/518 interchange seeks to channel the motorist's view down the corridor while providing subtle clues as to the sense of arrival to a "place." This will be accomplished through masses of signature conifers on the four corners surrounding the interchange, providing a dramatic natural gateway. This design is repeated on a smaller scale at the 509/146th Street SW interchange. A consistent row of tall, narrow conifers is proposed beyond the street trees along the off ramps to screen the back side of the businesses along First Avenue from view.

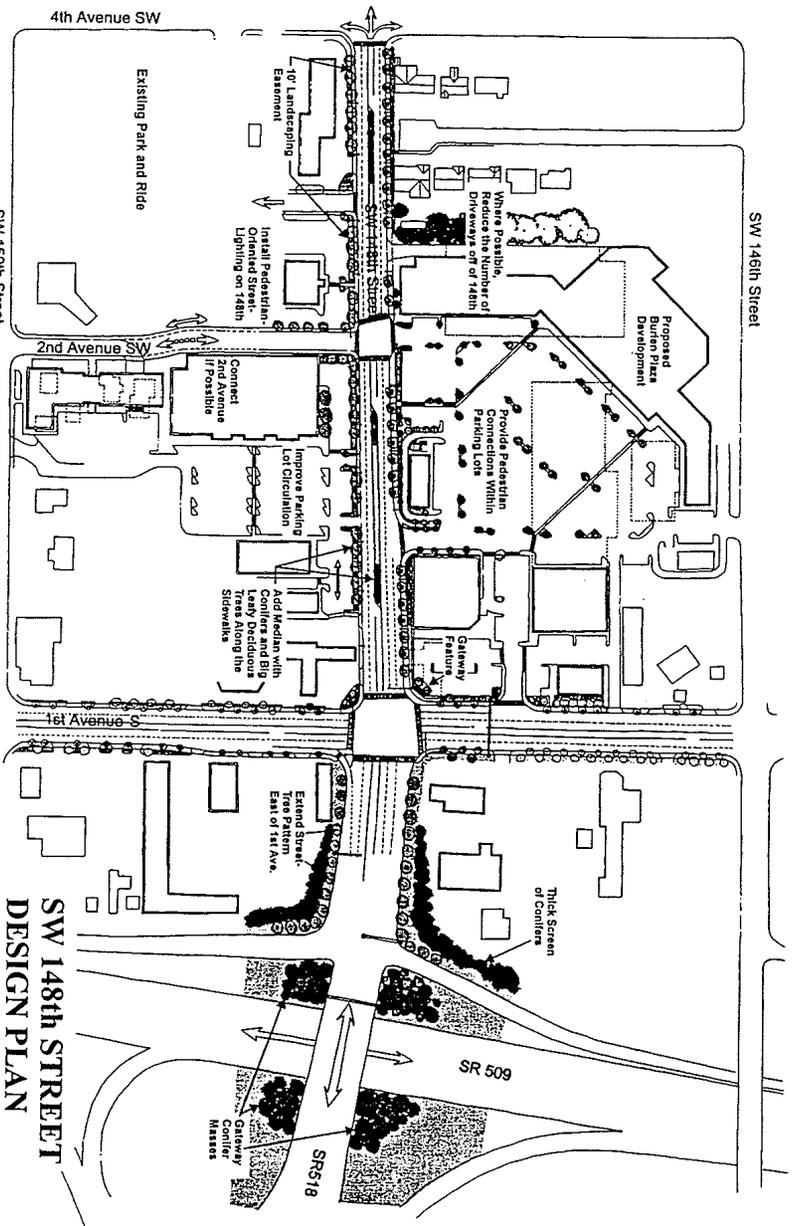
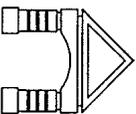
Formalization in the landscaping design begins at the approach toward 1st Avenue as street trees spill from 148th (and 146th) out onto the sides of the off ramps.

The plan for 148th Street includes a mixture of conifers and deciduous trees. The popularity of the existing large mass of conifers directly to the west of Burien Plaza provides the inspiration to use evergreens in the design of 148th Street's landscaping plan. Thus, the development of a street median with conifers plays an important role in making a powerful statement for the city while reducing the apparent width of the six-lane street. The plan calls for deciduous trees with large canopies along the sidewalks to channel the views down the corridor and provide continuity. More informal plantings are suggested on private property to allow for individual identity for the developments and add visual interest and a variety of color.

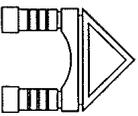
On First Avenue South, columnar deciduous trees are recommended along the sidewalks. The intent is to soften the streetscape while allowing for the visibility of businesses and signage along the avenue. Columnar trees are more appropriate given the location of power lines inside of the sidewalk. Similar to 148th Street, the plan suggested more informal street trees inside of the sidewalks. The power poles, however, will limit the vertical size of any trees to be planted on the development side of the sidewalks.



LANDSCAPE CONCEPT

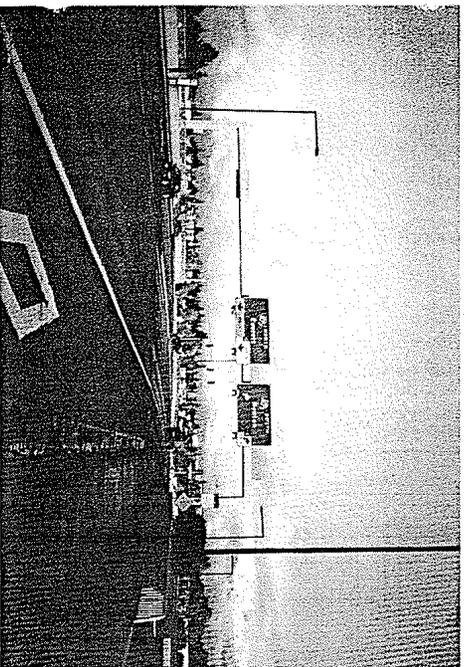


**SW 148th STREET
DESIGN PLAN**



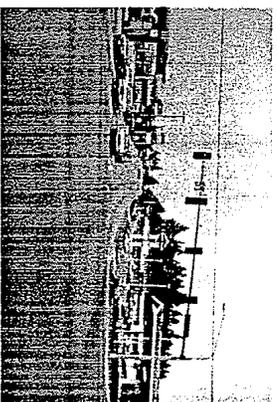
GATEWAY ENTRY FEATURES

Some of the first things people see as they enter Burien from Highway 518 are a series of large and intrusive overhead lattice highway signs, an expansive asphalt intersection, and an abandoned gas station. The gas station site on the northwest corner of Southwest 148th Street and 1st Avenue South is particularly visible since most motorist's are required to stop at the stoplight and look in its general direction. With the approaching redevelopment of this gas station site and Burien Plaza, the opportunity exists to provide a welcoming entryway feature at this site.



The proposed feature includes borrowed elements such as the triangle used in the city's logo and an arch similar to Lake Burien School's arch.

The plan also recommends the replacement of the highway lattice signs with monotube poles, which are much less intrusive.



Existing Conditions. Looking west down SW 148th Street from 1st Avenue S.

Replace existing lattice highway signs with the less obtrusive monopole sign, such as this one in Bellevue.



L4

RECEIVED

MAR 19 2002

URBAN CORRIDORS OFFICE

Response L4-1

Thank you for your comment.

March 14, 2002

PUBLIC WORKS
Don E. Wickstrom, P.E.
Director of Public Works

Phone: 253-856-5500
Fax: 253-856-6500

220 Fourth Ave. S.
Kent, WA 98032-5895

Ms. Susan Everett, P.E.
South King Engineering Manager
Washington State Department of Transportation
15700 Dayton Avenue North
MS 250
P.O. Box 330310
Seattle, WA 98133

RE: SR 509 Freeway Extension

Dear Ms. Everett:

This is a letter of support from the City of Kent Public Works Department for the proposed SR 509 Extension and related improvements. The SR 509 Extension represents a vital improvement to the South King County transportation system and would complete a much needed link in the regional freeway system.

Access to the Kent valley has become increasingly difficult for our residents and businesses due to traffic on I-5 and SR 167. The SR 509 Extension would reduce congestion on I-5 and may positively affect operations on SR 167 as well. In addition, connecting the S. 228th Street Extension with SR 509 via the proposed SR 516/I-5 interchange improvements would enhance the utility of both projects by significantly increasing capacity through the interchange.

We hope to coordinate with WSDOT staff on the design and implementation of improvements within the City of Kent, especially those connecting SR 509 with the recently approved S. 228th Street Extension. These two projects will provide residents and businesses in Kent, Des Moines, and SeaTac with a substantial improvement over existing and forecast traffic operations. Again, we fully support the SR 509 project and look forward to its completion.

L4-1

Sincerely,

Don E. Wickstrom, P.E.
Public Works Director

Cc: Gary Gill, City Engineer
Tim LaPorte, Design Engineering Manager

March 25, 2002

Mr. John White
Project Engineer,
Urban Corridors Office
WSDOT
6431 Corson Avenue South, MS-61
Seattle, WA 98108

Dear Mr. White:

Since 1990, WSDOT, FHWA, the Port of Seattle, King County, and the Cities of Des Moines and Sea-Tac have conducted extensive alternatives analysis and environmental review for the SR-509 Corridor Completion project. The revised Draft Environmental Impact Statement (RDEIS) outlines the impacts of each of several alternatives proposed for *creation of a new limited-access freeway* linking SR-509 with Interstate 5 in Southwest King County.

The Transportation Choices Coalition would like to acknowledge the substantial work that has been completed to date and thank WSDOT for the opportunity to provide comment on the revised DEIS.

The comments included within this report fall generally within the following categories:

- a) The scope of proposed actions in each of the 'build' alternatives, and
- b) The need for further evaluation of strategies to maximize capacity on the existing highway and arterial network through trip reduction, transit expansion and travel demand management.

Scope of proposed "build" alternatives

"The purpose of the proposed action is to improve regional highway connections with an extension of State Route (SR) 509 to serve future transportation needs in southwest King County and to enhance southern access to Seattle-Tacoma International (Sea-Tac) Airport." (SR509-DEIS, pg 69)

The “build” alternatives for the SR-509 Corridor Completion/I-5/South Access Road project all propose to achieve these ends with three linked highway projects, including:

- 1) Extension of SR-509 south from its terminus at S. 188th Street to a new interchange with Interstate-5 near S. 212th St.;
- 2) Construction of a new direct southern access road to Sea-Tac International Airport, and;
- 3) Widening of Interstate-5 by two to four new general purpose lanes between S. 210th Street in Sea-Tac and S. 310th Street in Federal Way.

P1-1

While the SR509 Extension and Sea-Tac South Access Road improvements both appear directly related to the stated purpose and need for the project, the significant expansion of general-purpose lane capacity on Interstate 5 included in all build alternatives is un-justified. Such wholesale widening of I-5 for several miles in Southwest King County may well be viewed as necessary to minimize congestion where I-5 meets a new SR509 extension. However, extending the scope of the project to address congestion “hot spots” created by filling in a “missing link” in the regional highway network would necessitate major widening of SR-99 through Seattle and expansion of regional connections to West Seattle and I-5 via the Spokane Street Viaduct/West Seattle Freeway.

If the proposed projects cause greater congestion on I-5 South of S. 212th, and on SR-99 south of the Spokane Street Viaduct/ West Seattle Freeway, it will be precisely because the SR-509 Extension project has met its stated objective to shift trips off of local arterials and I-5 South of the I-405/SR-518 interchange by “improving regional highway connections.”

As WSDOT moves forward with implementation of the SR-509 Extension and South Access Road improvements, the scope of the project should be refined to include only minimal construction of exit and entrance ramps connecting the new freeway link and Airport Access Road with I-5.

Further analysis

Prior to permitting construction of the SR509 to I-5 freeway connection, South Airport Access Road or general widening of I-5, the cities of Des Moines, SeaTac, Burien, Kent, WSDOT, the Port of Seattle and other lead agencies should commission further analysis to more adequately capture the impacts of each proposed alternative, and to incorporate a full-range of strategies such as those identified below, for achieving project objectives.

1. Evaluate TDM, road pricing and ‘Smart Growth’ land-use policies

P1-2

Hire a known expert such as Sam Seskin of Parsons Brinkerhoff to craft an aggressive and innovative package of trip reduction and demand management strategies including:

Response P1-1

Improvements to I-5 are intended to address FHWA requirements (FR 63, No. 28, February 11, 1998). FHWA policy states “it is in the national interest to maintain the Interstate System to provide the highest level of service in terms of safety and mobility.” Before approving the proposed project, FHWA requires WSDOT to demonstrate that the SR 509/South Access Road interchange would not degrade traffic operations or safety on I-5. As discussed in Chapter 2 of the EIS, the scope of the proposed I-5 improvements was the result of a value engineering review, which determined that these improvements would improve traffic operations, minimize social and economic impacts in the I-5 corridor, and ensure that the City of Kent’s plans for the South 228th Street Corridor extension are not precluded. These improvements are necessary to ensure FHWA approval of the SR 509 project and prevent degradation of I-5 traffic operations and safety. The Access Decision Point Report (CH2M HILL 2002) demonstrates WSDOT’s compliance with FHWA requirements.

Response P1-2

A TSM/TDM alternative, which included trip reduction measures and transit incentives, was evaluated and two tollway alternatives, which included congestion pricing, were included in the May 1995 Major Investment Study conducted for the project. Based on this analysis, these alternatives would not meet the project purpose and need and, therefore, were rejected for further evaluation in the EIS. Please refer to Chapter 1 of this EIS for a discussion of alternatives considered but rejected.

**P1-2
(cont.)**

- o Expansion of existing trip reduction programs such as the City of Seattle's Trip Reduction Initiative (TRI), and the State Commute Trip Reduction (CTR) program.
- o Creation of an entrepreneurial trip reduction grant program that reduces traffic and preserves road capacity in the project area for high value trips.
- o Evaluation of the potential impact of Smart Growth policies, including incentives for transit-oriented design (TOD) in SeaTac, Des Moines, Burien and Kent, as well as in other common origins and destinations of trips through the project area.
- o Analysis of the effectiveness of variable tolls, or "congestion pricing" on the SR509 Connector and on other regional "highways of statewide significance." Pricing should be evaluated (using the newest PSRC travel models) as both a potential revenue source and transportation demand management strategy for the SR509 and I-5 Corridors.

Evaluate the variable effectiveness of the recommended transportation demand management strategies under each alternative and design an appropriate package of trip reduction measures for each (the effectiveness of demand management programs is expected to vary as assumptions about congestion, general purpose lane capacity, transit speed and capacity, vehicle occupancy requirements, and road pricing vary between alternatives).

2. Evaluate a transit-based alternative to meet project objectives

While the calculations of future travel demand in the project area assume completion of the Central Link Light Rail project and other committed Metro and Sound Transit projects, none of the project alternatives evaluate the potential for further transit improvements in the project area and larger region to meet the stated objectives of the SR-509 Corridor Completion/I-5/South Airport Access Road project. The RDEIS is incomplete and inadequate without alternatives to the No-Action and three freeway-based build options.

P1-3

Before proceeding to implementation, WSDOT and the co-lead cities and agencies must complete a supplemental environmental analysis of a transit-based alternative that might include:

- a. Extension of the Central Link Light Rail line from Sea-Tac Airport to Tacoma, to complete a missing link in the regional High Capacity Transit system, improve southern access to Sea-Tac International Airport and relieve congestion on I-5, SR-99, SR509 and major north-south arterials in the project area.
- b. Extension of the proposed Seattle Monorail south to Sea-Tac International Airport via White Center and Burien (West Seattle Line), or via SODO, Georgetown and South Park (along an alignment identified by the Elevated Transportation Company (ETC) as a possible "city-wide corridor").

Response P1-3

Transit-only alternatives, including a bus transit alternative, an expanded bus transit alternative, and an expanded rail and bus transit alternative, were evaluated in the May 1995 Major Investment Study conducted for the project. Analysis of these alternatives included the following: completion of the commuter rail and high-capacity transit elements of the proposed regional rail transit system; the proposed Sea-Tac People Mover system; expanded local bus service; and freight use of HOV facilities. Because extension of the monorail to Sea-Tac Airport was not included in any regional or local transportation plan, it was not included in the analysis. Based on evaluation on the Major Investment Study, these alternatives would not meet the project purpose and need and, therefore, were rejected for further evaluation in the EIS. Please refer to Chapter 1 of this EIS for a discussion of alternatives considered but rejected.

P1-3
(cont.)

- c. New local shuttle bus service throughout the project area to improve neighborhood connections and expand the service area of existing and planned regional bus and rail service.
- d. Further investment (above and beyond currently planned improvements) in freight rail facilities between Seattle and Tacoma via the Kent Valley, including grade-separation and new right of way where possible to improve rail freight mobility and ease congestion on area highways.

3. Evaluate indirect regional land-use and transportation impacts

“Although the proposed project would support and facilitate planned growth, it would not induce growth... Therefore, no secondary impacts are expected to result from the SR 509 Corridor Completion/ I-5/ South Access Road Project.” (DEIS, pg. 497)

This statement, justifying the lack of substantial analysis of secondary and cumulative impacts of each alternative in the revised SR509 DEIS, defies experience in this region, which has shown a strong connection between transportation infrastructure investments and subsequent land-use and development patterns. General-purpose capacity expansion on major urban freeways is known to generate low-density, automobile-oriented land development in areas that benefit from improved regional auto accessibility.

P1-4

Because the Action and No-Action alternatives considered in the DEIS allow different general-purpose traffic volumes on SR-509, I-5, and the local arterial network, they can be expected to have different impacts on regional land markets, particularly in the demand for low density, auto-centered commercial and residential development. This type of development has a whole range of environmental impacts, from increased runoff of pollutants into salmon-bearing creeks and streams, to higher region-wide vehicle miles traveled (VMT) and consequent air pollution. The extent of indirect environmental impacts of the various alternatives should be measured using the best available methods.

P1-5

To more accurately capture the feedback between transportation system investments and land development patterns, the options for the SR-509/South Access Road should be re-evaluated using the Puget Sound Regional Council's newest travel forecasting model. The model to be “validated” in October of 2002 is a significant improvement over the version used to model SR-509 alternatives, in that it includes home-based shopping and “other” trips, car-pools of varying occupancies and non-motorized trips (walk and bike trips that have been inexplicably left out of regional travel forecasting to date).

If the old PSRC travel and land-use models must be used for a reassessment of the SR509 Connection/South Access Road project and other regional ‘mega-projects,’ PSRC and WSDOT should take the following steps to ensure accurate evaluation of secondary impacts:

Response P1-4

The proposed SR 509 project is incorporated in the comprehensive plans of local jurisdictions within the project area. These comprehensive plans were subject to environmental review, which included impacts on transportation and land use.

The cumulative effects analysis was done in accordance with Council of Environmental Quality guidelines. Please refer to Section 3.17.2, *Cumulative Impacts*.

Response P1-5

Two land use scenarios were developed – one for the No Action Alternative and the other for the build alternatives. Using this approach, various development scenarios with or without construction of the SR 509 project can be compared to ensure compliance with transportation service standards and growth management regulations. As described in Chapter 2 of the EIS, land use data for the traffic model were based on regional forecasts by PSRC; however, these forecasts were further modified at a TAZ level to reflect local land use plans and information from meetings with local staff. In addition, the PSRC model included the latest Sea-Tac Airport Master Plan information.

The PSRC model included assumptions for improved transit and nonmotorized mode choices; transportation demand management strategies were also included and quantified for model calibration.

P1-5
(cont.)

- a. Do not assume that land development patterns from 2002 to 2022 will be identical for all alternatives. Growth and land-development patterns can fairly be expected to vary under different transportation system improvement scenarios.
- b. Project land use changes at the local level (transportation district or zone) for each alternative. The DEIS aggregates land-use impacts to the County level, obscuring significant changes at the local level and preventing analysis of local impacts to the environment and transportation networks.
- c. Feed projected local land-use changes into the travel model to project, as best possible, travel demand induced by expanded capacity on Interstate 5 and a new limited access freeway connection between I-5 and SR-509.

P1-6

New freeway capacity is also known to increase traffic volumes both on the expanded facility and on connecting arterials and expressways through induced demand. The performance of connecting routes and particularly key interchanges can degrade as they are overburdened by new traffic accessing the expanded corridor. Further analysis should focus on the relative impact of each alternative on congestion levels on connecting freeways and arterials.

P1-7

3. Improve cost-benefit analysis of each alternative
The DEIS should include more detailed analysis of construction related impacts. Construction related delays to auto, freight, transit, bicycle and pedestrian users are a significant cost that should be quantified for each major element of each alternative and weighed against expected project benefits.

The cost-benefit analysis must also appropriately value transit riders' time spent in transit. An hour commute by bus or train is less costly to many individuals than a comparable one-hour commute by car because transit users have the freedom to work, read or "relax" on the way. WSDOT and transit agencies should attempt to measure this relative 'benefit' of time spent in transit by conducting surveys of transit users and incorporating the results into the cost-benefit evaluation of transit and roadway investments in the SR509 project area.

P1-8

4. Commission an independent Expert Review Panel to review the revised SR-509 DEIS document and public process to ensure their fairness and adequacy. The SR-509 Connector is a controversial project. An independent Expert Review Panel consisting of local and national transportation professionals should objectively review and make substantive comments on the SR-509 Corridor Completion/I-5/South Access Road project DEIS for adequacy and quality of product. A fair resolution must go beyond addressing local interests to convincingly show how a Preferred Alternative will produce long-term regional transportation and land use benefits.

Thank you for your consideration. If you have any questions or comments, please contact Kevin Shively, TCC Regional Project Manager at 206-329-2336.

Response P1-6

As described in Chapter 2 of the EIS, the existing SR 509 freeway is underutilized. The traffic study shows that the project would increase traffic on the existing SR 509 freeway. As a result, WSDOT has proposed to mitigate impacts on the existing freeway by increasing the number of lanes to six, including two HOV lanes, which is consistent with WSDOT's 20-year plan.

Per FHWA requirements, WSDOT has prepared an Access Decision Point Report (CH2M HILL 2002), which evaluates the effect of the new SR 509/I-5 interchange on highway operations. From this report, portions of I-5 south of the proposed SR 509 connection would also incur additional traffic. This is addressed by the I-5 improvements proposed as part of the project.

The Access Decision Point Report also showed that the proposed project would not worsen traffic operations at the interchanges, rather it would improve operations by diverting traffic from I-5 to SR 509. Traffic using local interchanges because of poor south airport access is also expected to continue on the freeway system, thereby improving local arterial operations.

Response P1-7

A benefit/cost analysis was conducted for the project in January 2002. The analysis was based on an approach developed by FHWA in a benefit-cost software package called STEAM (Surface Transportation Efficiency Analysis Model) that considers benefits and disbenefits of transportation improvements, including travel time savings for HOV, transit, and commercial vehicles. The resultant benefit cost ratio was 8.3, which is unusually high for a project of this type. This result occurs mainly because the SR 509 project would result in both travel-time savings (higher average speeds) and shorter trip lengths because of the more direct routing afforded by the new roadway.

Response P1-8

The Revised DEIS was reviewed in accordance with SEPA and NEPA regulations. Preliminary Revised DEIS reviewers included representatives from local jurisdictions and the Steering Committee. The Revised DEIS was circulated to the public and resource agencies for review.

Peter Hurley
Executive Director

Kevin Shively
Regional Project Manager

P2

19 March 2002

John White, P.E.
Project Engineer
Urban Corridors Office
Washington State Department of Transportation
6431 Corson Avenue South, MS 61
Seattle, WA 98108

Dear Mr. White,

Comments herein are submitted in response to the *Project Newsletter*, Number 9, January 2002, which states that WSDOT seeks public comment on the revised draft EIS for the SR-509 Corridor by 25 March 2002.

The revised EIS of January, 2002 is silent concerning the effects on (and accomodation of) bicyclists moving between Des Moines, Seatac, and Kent through the intersection of SR-516 and I-5/SR-509, known locally as Midway Interchange. Conceptual designs displayed by WSDOT at the 27 February 2002 SR-509 Openhouse did not show enough for observers to judge consistency with Paragraph 3.10.3 *Pedestrian and Bicycle Facilities* in the RDEIS. Consequently, citizen comments in graphical format are attached to this letter as diagrams showing explicitly what bicyclists need for safe efficient access through Midway Interchange. The final EIS and conceptual designs should contain the concepts described in the attachments.

P2-1

Midway Interchange is important to bicyclists because it is one of few widely spaced locations for crossing I-5. The next nearest crossings are over a mile away to the north and over 2 miles to the south of Midway Interchange. These are significant distances for the non-motorized transport modes of walking and cycling.

All three modes of transport (walking, cycling, and motoring) are in common use along SR-516 through Midway Interchange today. Cycling in particular would be better served by explicitly marking corridors of passage for this mode. The conceptual designs displayed on 27 February show no markings or even space for bicyclists in the post-SR-509 version of Midway Interchange. The diagrams attached to this letter describe a recommended channelization that accomodates all three modes of transport.

P2-2

The channelization recommended in the attachments improves the functionality of the SR-509 version of Midway Interchange for bicyclists. Channelization reduces conflicts between motoring and bicycling modes by enabling each user to know where the other users are supposed to be and where they are going. This knowledge enables all users of the intersections to reliably predict future movements of people using the other modes. Coordination of motoring and cycling traffic through the Midway Interchange area is substantially improved.

The attached drawings consider 8 intersections in the vicinity of the SR-509 version of Midway Interchange as a single integrated entity. The 8 intersections are shown in the chart titled

Response P2-1

Specific details of bicycle facility improvements are not a part of this EIS, but will be addressed at a later stage of the project design. Bicycle lanes will be provided to allow safe access through the SR 516 interchange at either the SR 516 overcrossing or the South 228th Street overcrossing, but not both. Preliminary improvements under consideration include bike lanes under I-5 at the proposed South 228th Street overcrossing with connections to SR 516 and the city of Kent's South 228th Street extension project. Additional bike lanes along SR 516 under I-5 are currently being analyzed, but existing bridge columns under I-5 create limitations. Relocating the columns would require relocating the bridge at a significant cost.

WSDOT has noted and understands the bicycle community's preference for a bike lane at the SR 516 undercrossing, and additional design options are being looked at for this location based on safety, constructability, and cost. Text in Section 3.10 of the EIS has been updated to describe the planned improvements.

Response P2-2

Specific details of bicycle facility improvements are not a part of this EIS, but will be addressed at a later stage of the detailed project design. Your suggested bike lane channelization will be considered during this next phase of design, as described in the response to Comment P2-1 above.

P2-3

"OVERVIEW." Note that the two intersections of SR-516 with SR-99 and Military Road South are included. As portals to this important crossing of I-5, these two intersections are considered as parts of the integrated picture. Channelization markings recommended in this comment are consistent and continuous through all the intersections shown in OVERVIEW.

The chart titled "INDEX" depicts the relative locations of detailed diagrams that show particular features of each of the 8 intersections affected by the SR-509 rework of Midway Interchange.

A summary of expected bicyclists' usage of the SR-509 version of Midway Interchange is presented in the chart titled "THROUGH CYCLISTS ANALYSIS." More detailed analyses of through, left-turning, and right-turning cyclists accompany each intersection chart. Explanatory notes are placed on the chart for each analysis. All cycling routes shown in the charts are consistent with Washington State traffic laws.

All diagrams in this comment show final configurations after completion of three related projects: SR-509, the redevelopment of Pacific Highway South by Kent and Des Moines, and the redevelopment of Military Road South by Kent.

Kent, Des Moines, and King County have done excellent work by designing their recent road improvements to be compatible with bicycle transport, much to the appreciation of people using the new facilities. The new designs have produced attractive roadways, smoother traffic flows, dramatic safety improvements for cyclists, and improved public perception of competency of the road designers and their managers.

Midway Interchange is an integral part of the bicycling picture in Kent, Des Moines, and Seatac. The SR-509 Project has a wonderful opportunity to make Midway Interchange a far more compatible piece of the overall bicycling picture than it is today.

Thank you for the opportunity to comment. Questions and comments can be directed to the undersigned.

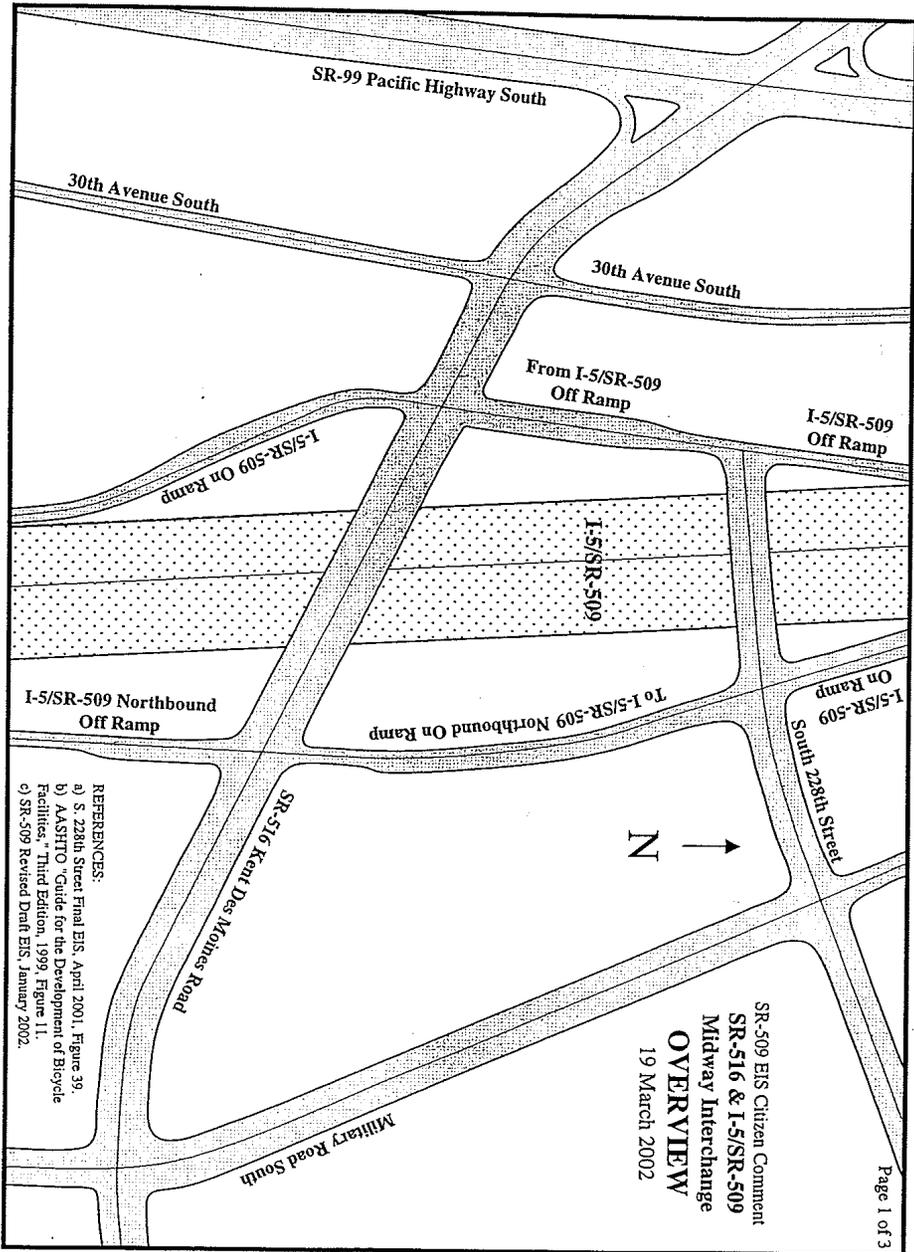
Respectfully submitted,

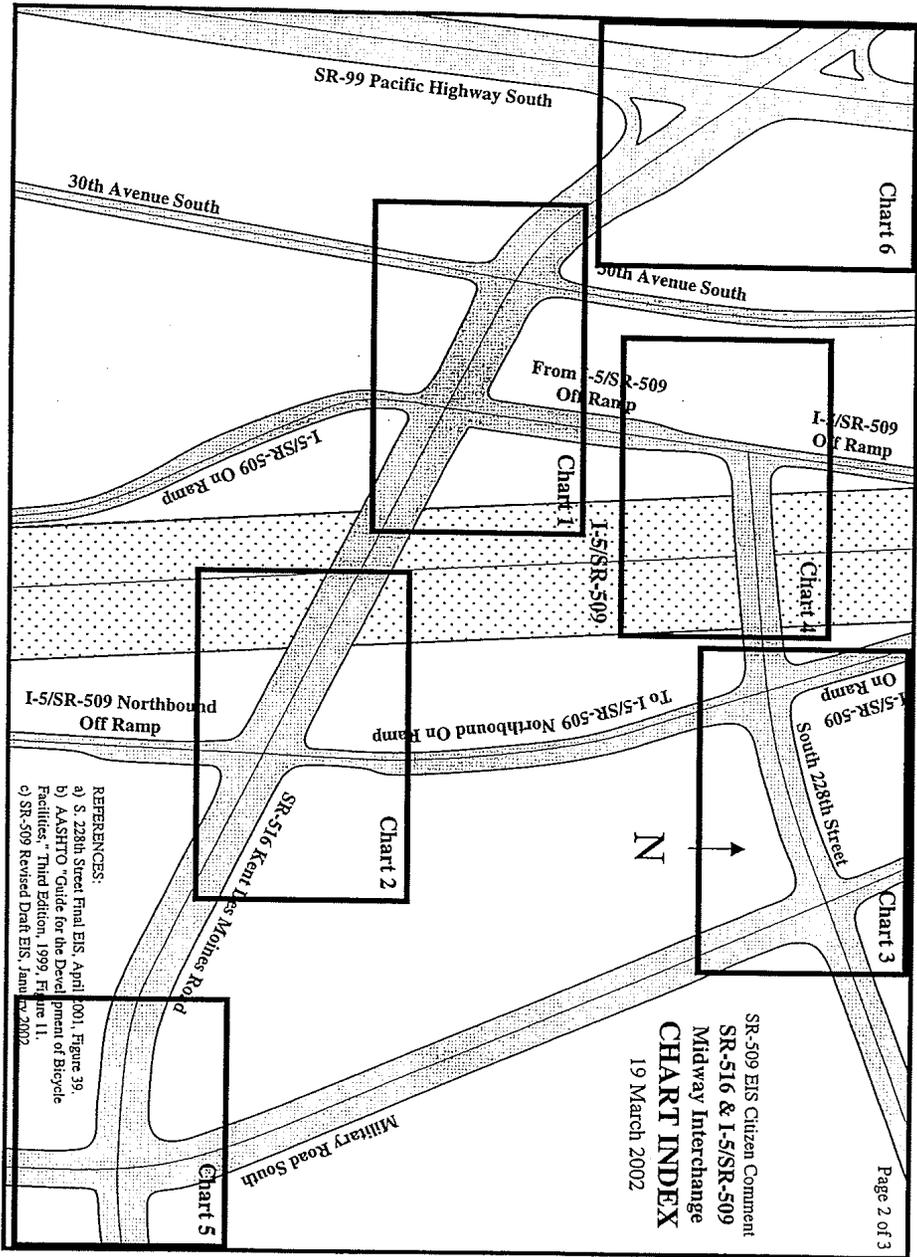
<u>David W. Hoffmann</u>	<u>Steve Nuss</u>	<u>Melvin I Roberts</u>
David W. Hoffmann	Steve Nuss	Melvin Roberts
25334 45th Avenue South	26220 42nd Avenue South	9421 South 241st Street
Kent WA 98032	Kent WA 98032	XXXXXXXXXXXX
		KENT, WA 98031
<u>Jacob W. Grob</u>	<u>James R. Hamilton</u>	<u>William T. Miller</u>
Jacob Grob	James R. Hamilton	WILLIAM T. MILLER
5408 South 236th Street	1123 Southwest 335th Street	827 W. VALLEY HIGHWAY #95
Kent WA 98032-3389	Federal Way WA 98023	KENT, WA 98032

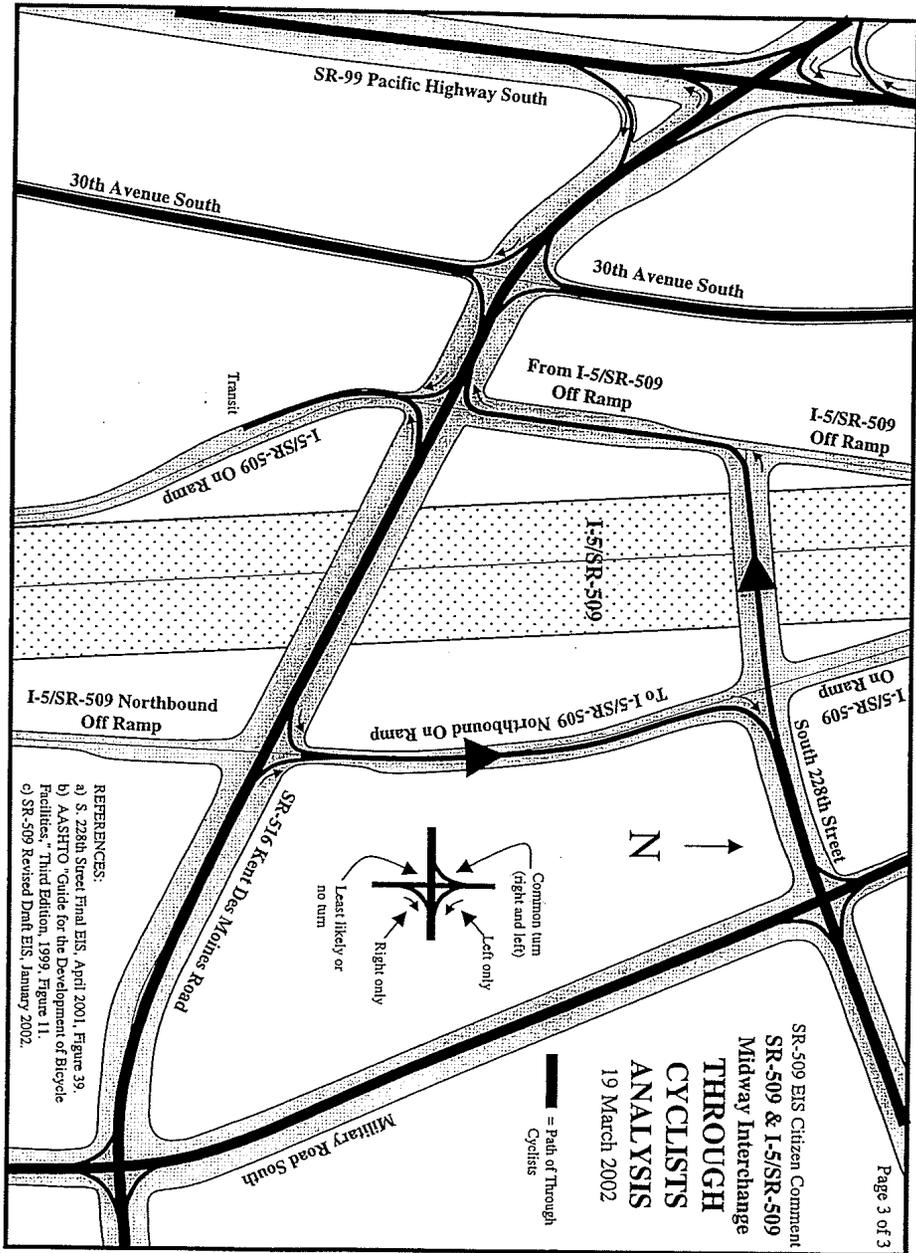
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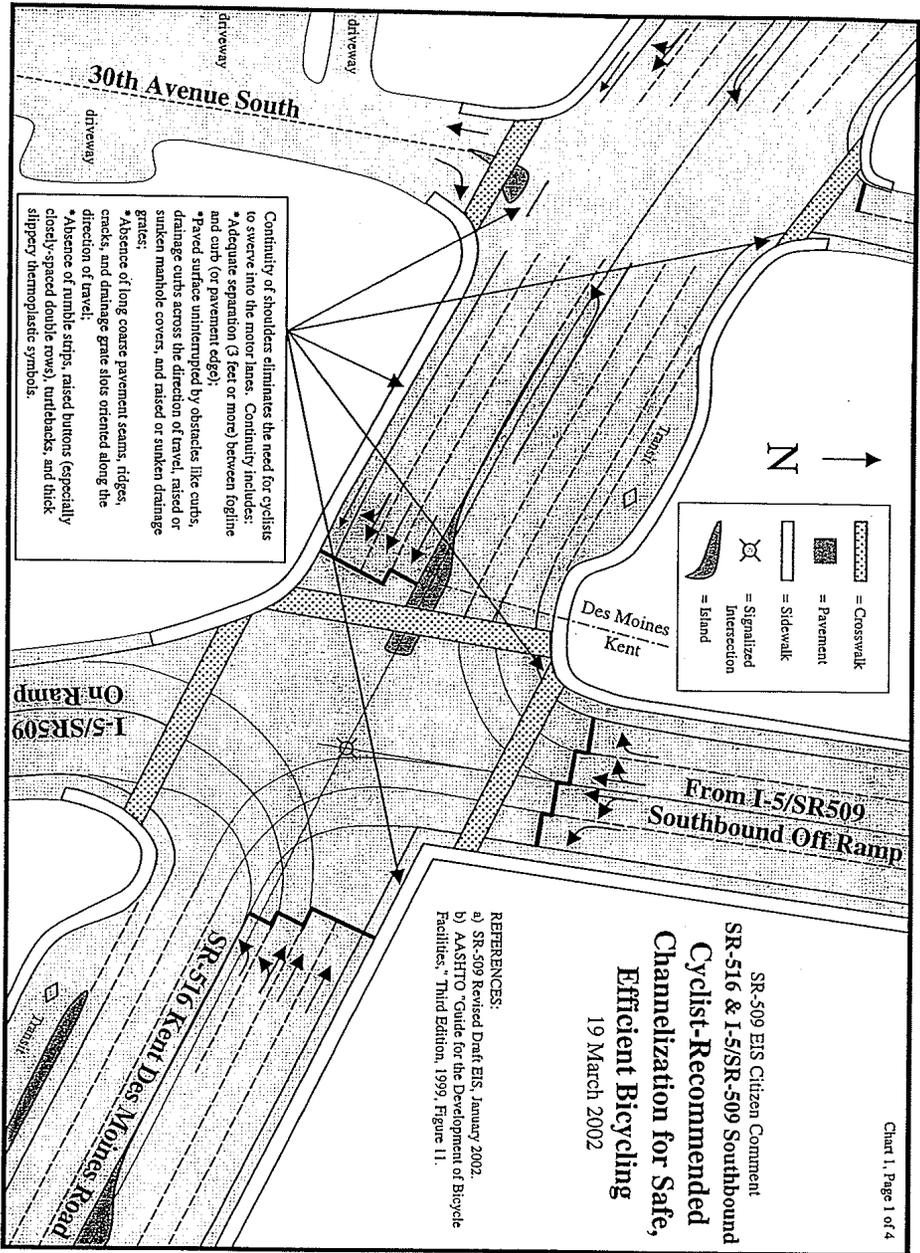
Response P2-3

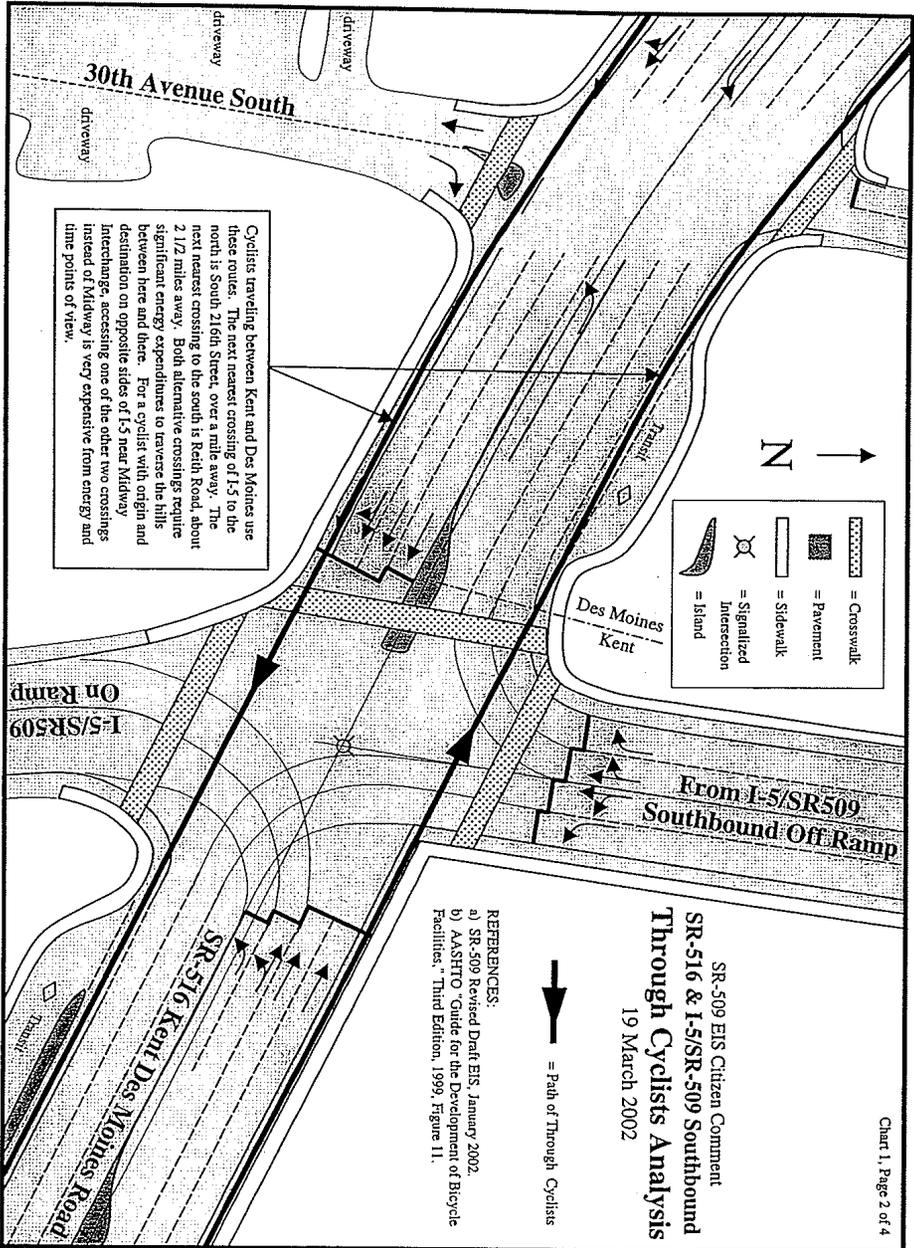
Thank you for the time and effort in providing detailed suggestions for bicycle intersection improvements. Improvements to some of the eight intersection identified in your comments are not part of the proposed project. Your suggested intersection improvements have been forwarded to the Cities of Kent and Des Moines. We will continue to work with the bicycle community as we develop the preliminary design of the facilities associated with the proposed project, and will make those designs available for review when they are sufficiently complete.

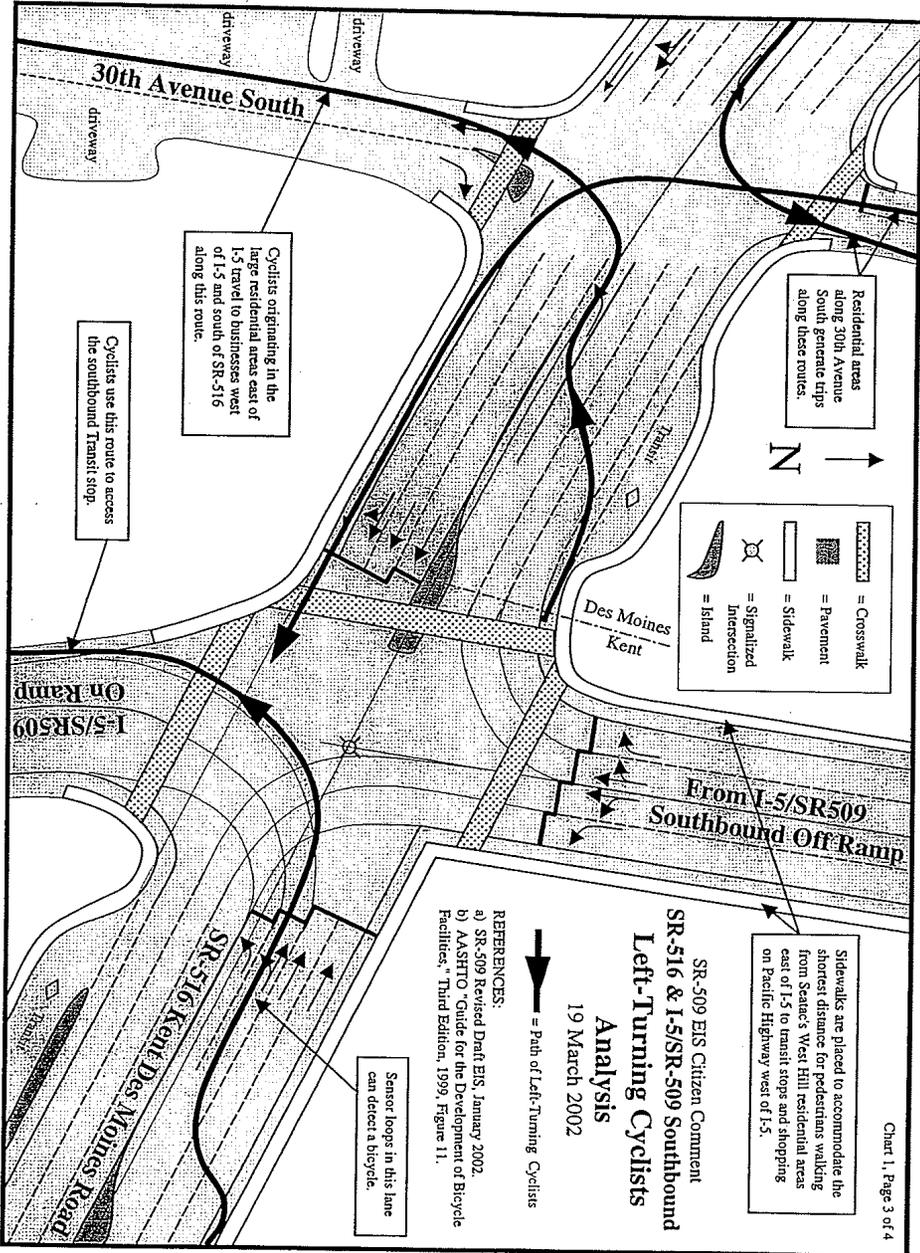


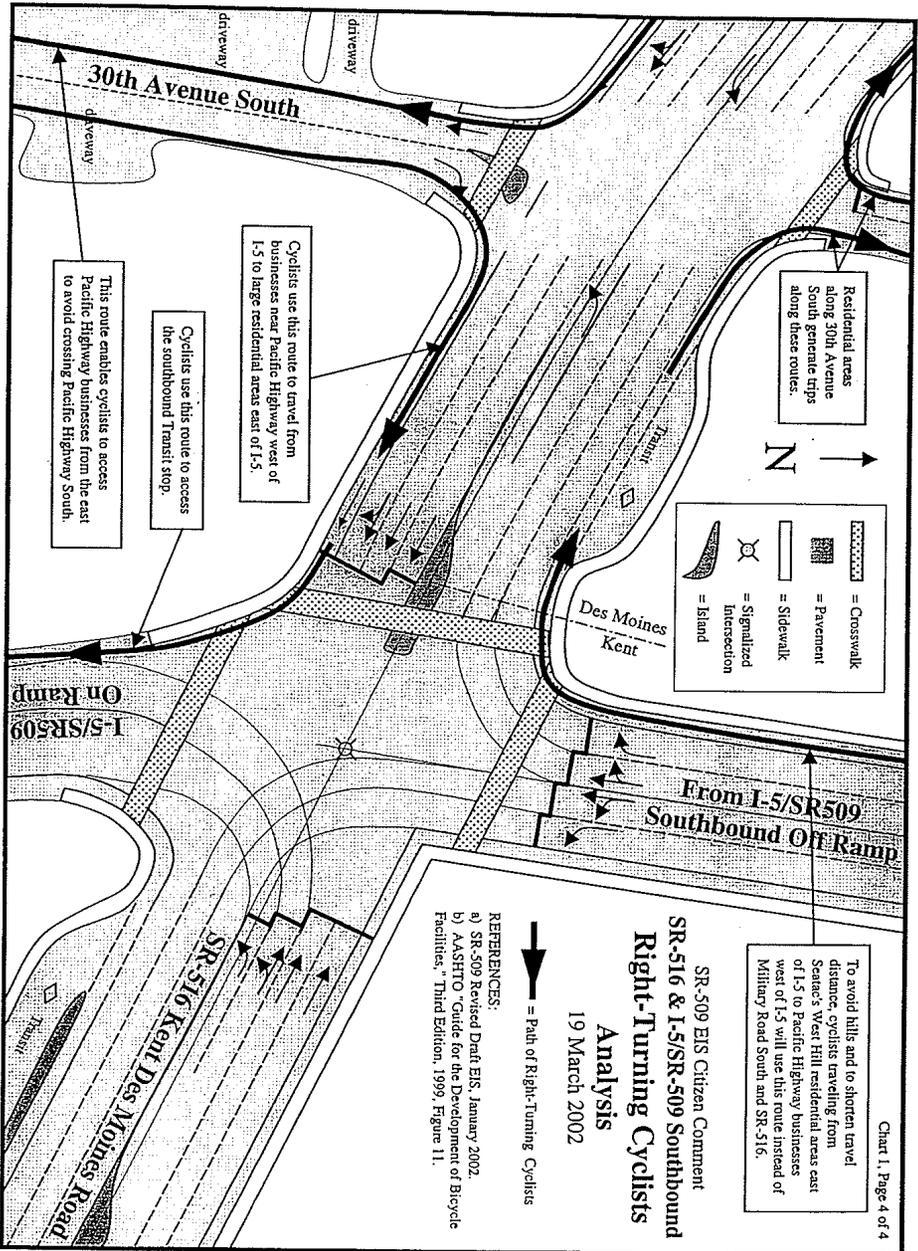


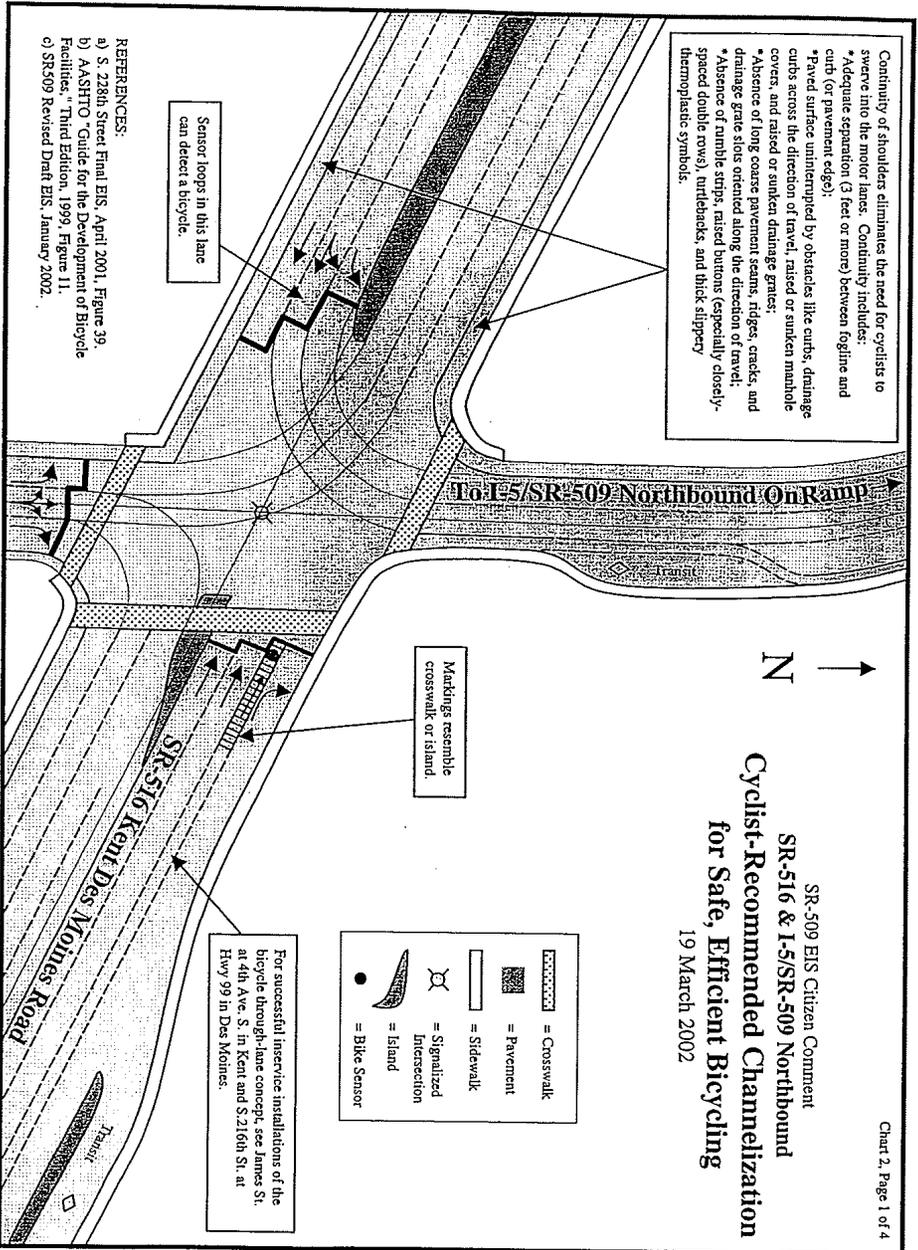


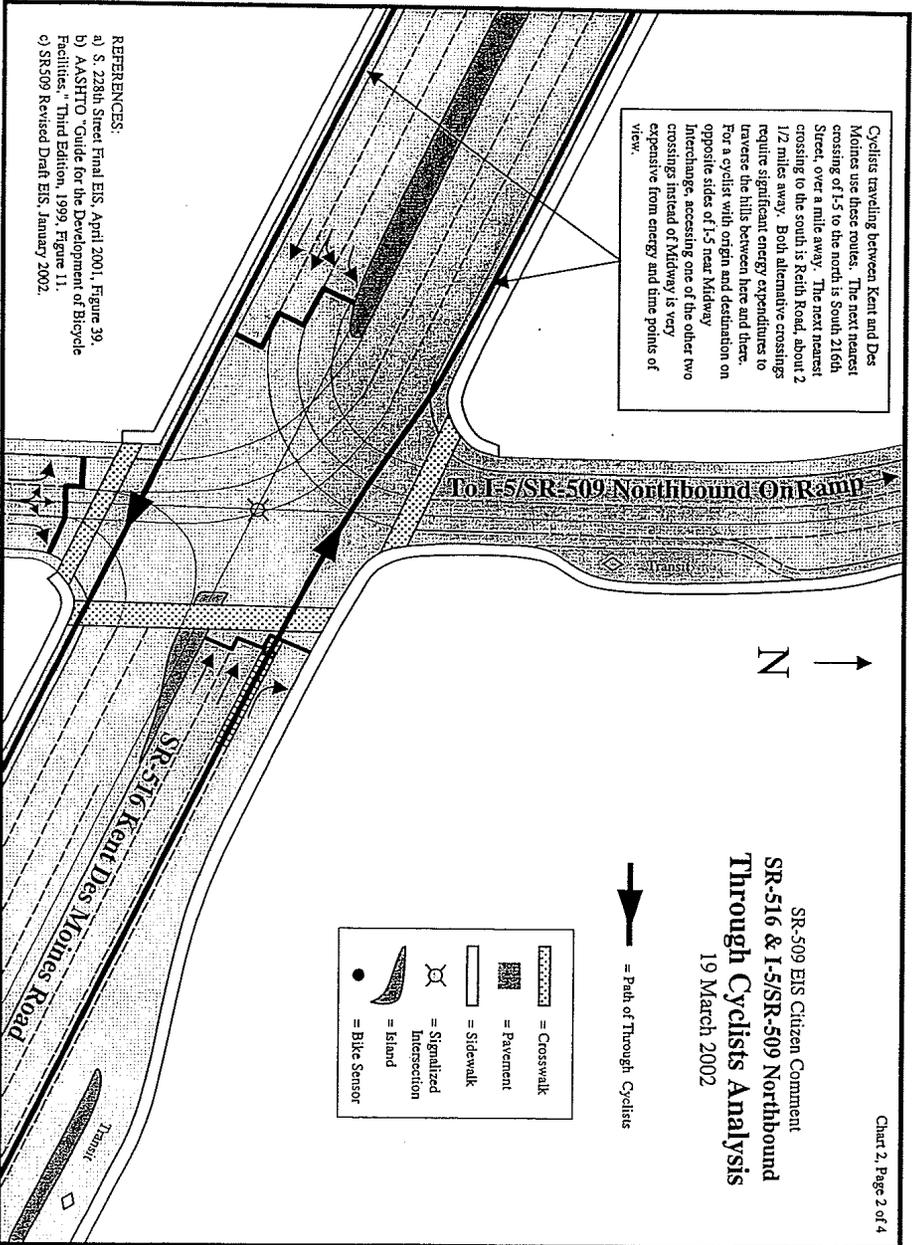












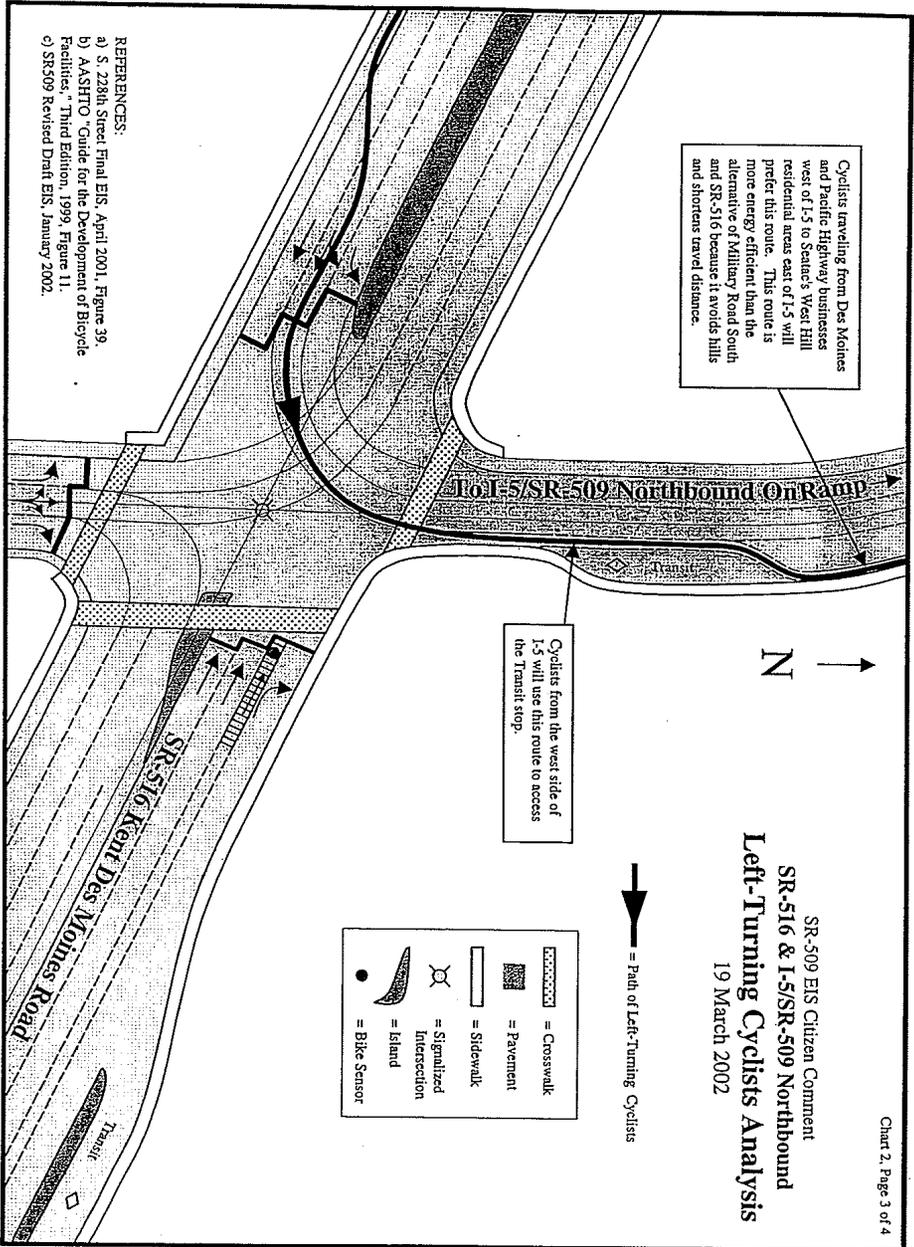
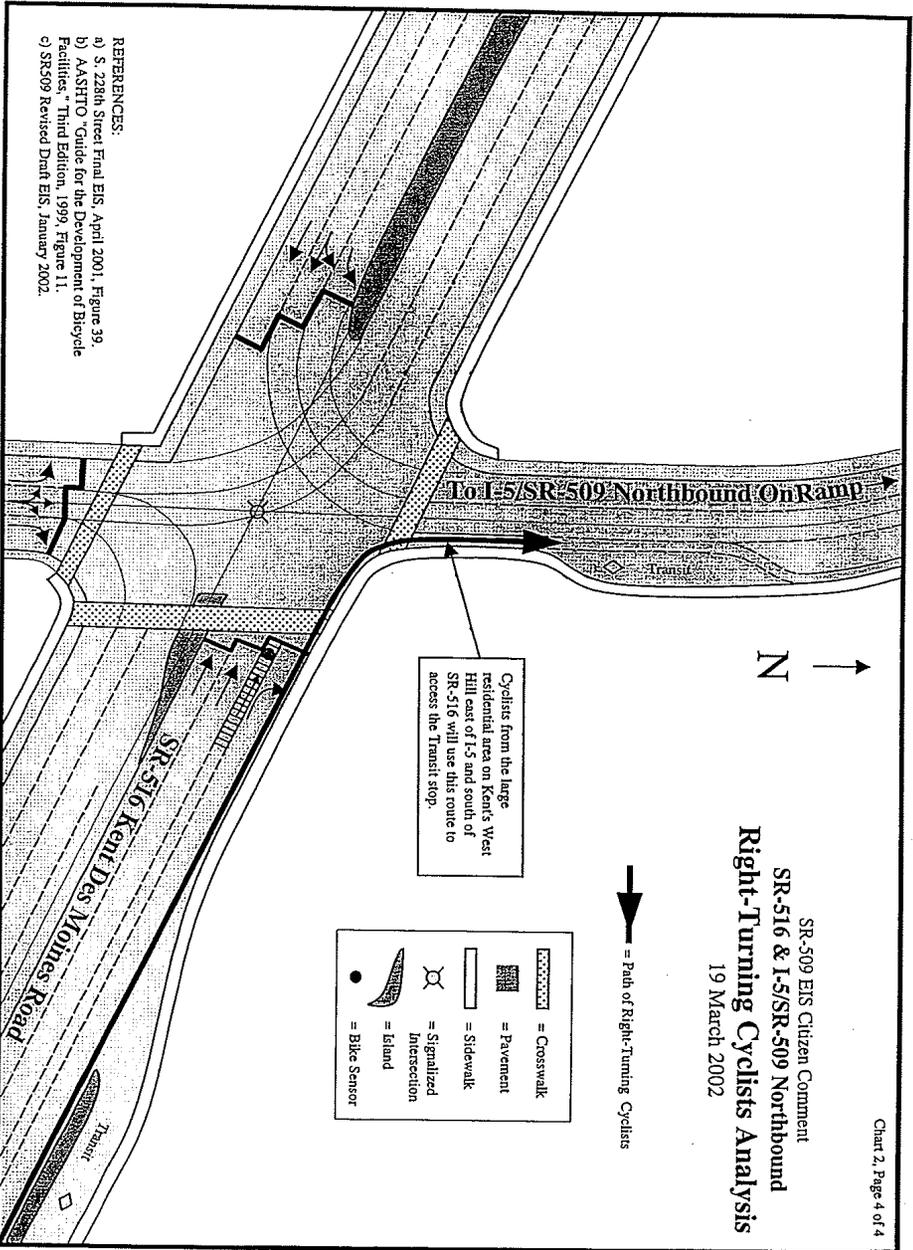
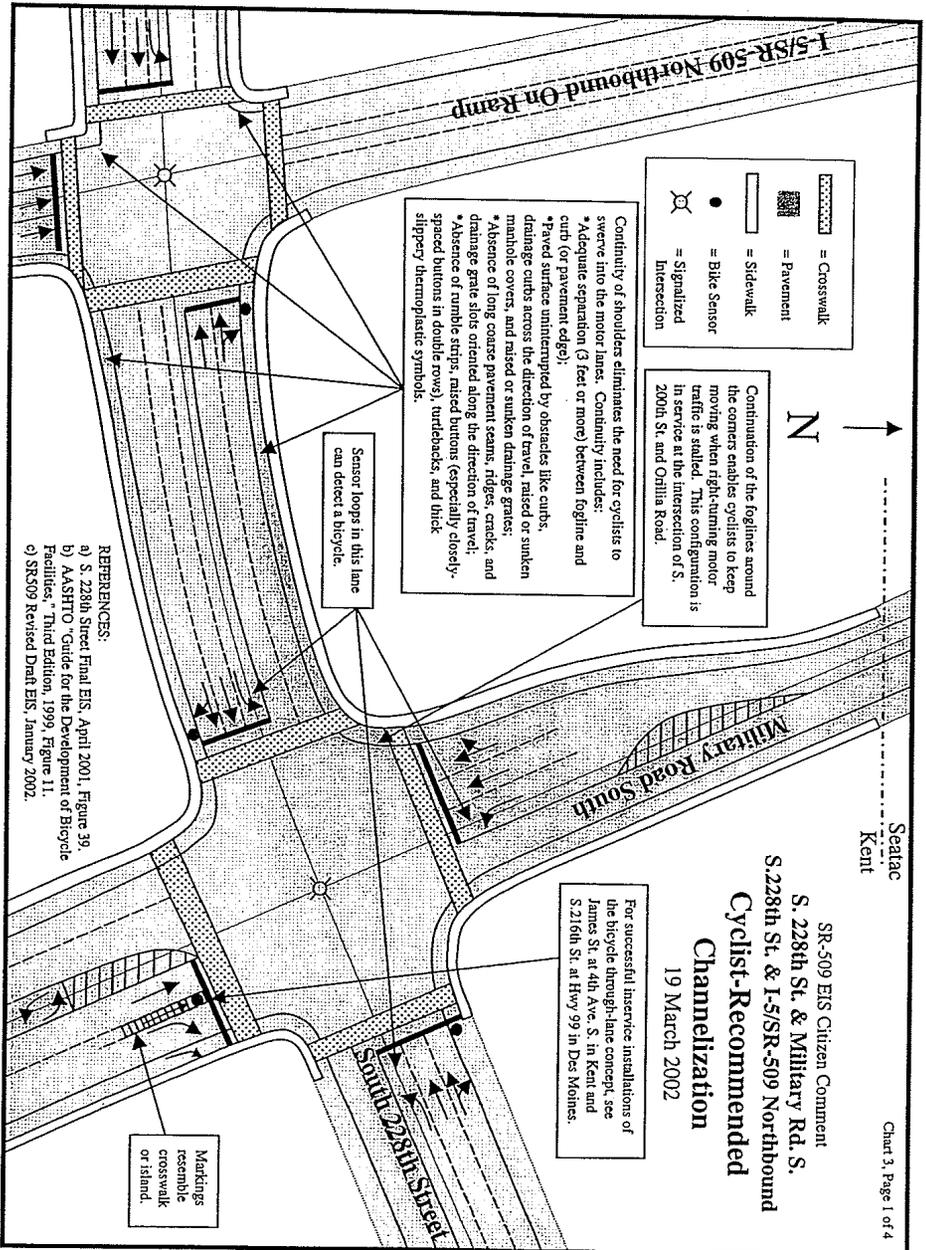
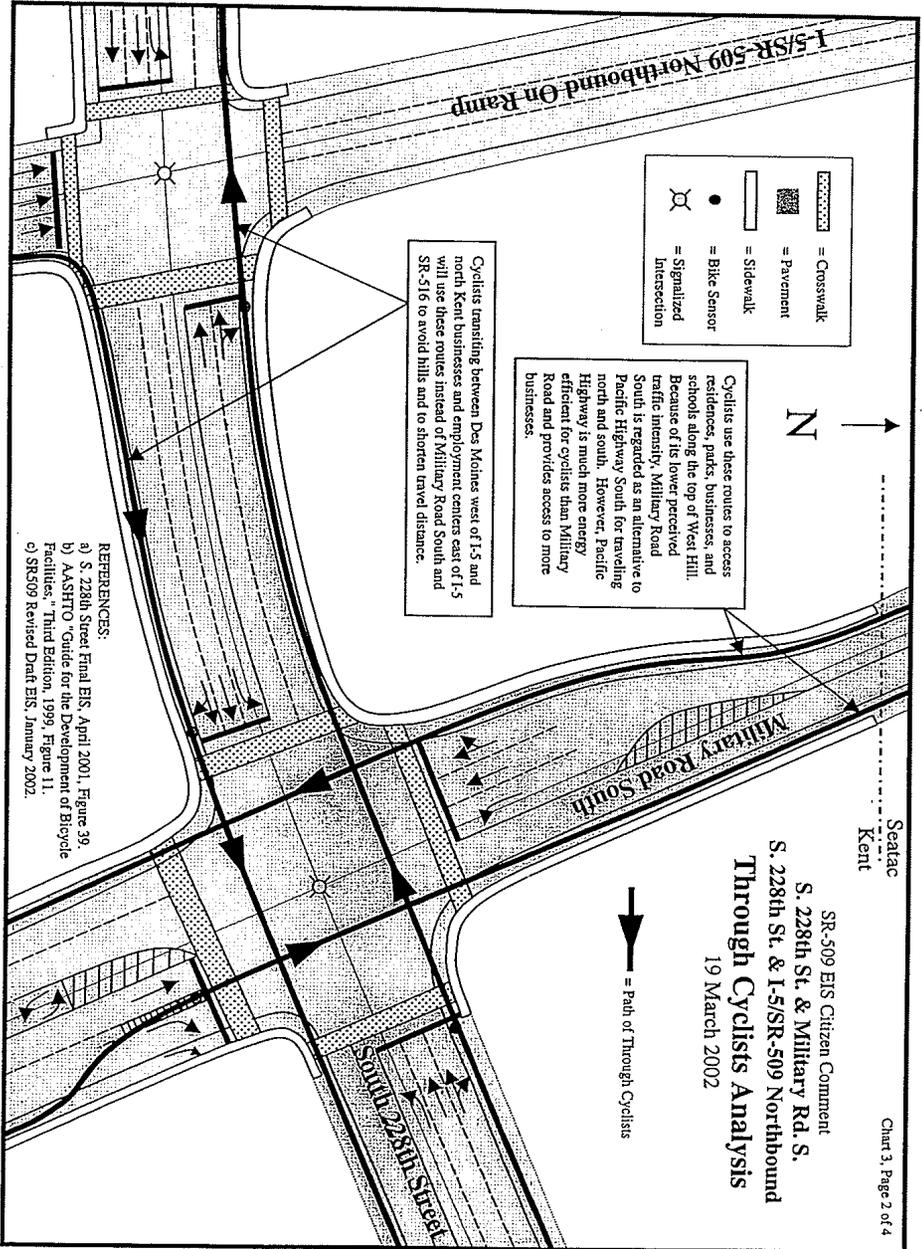


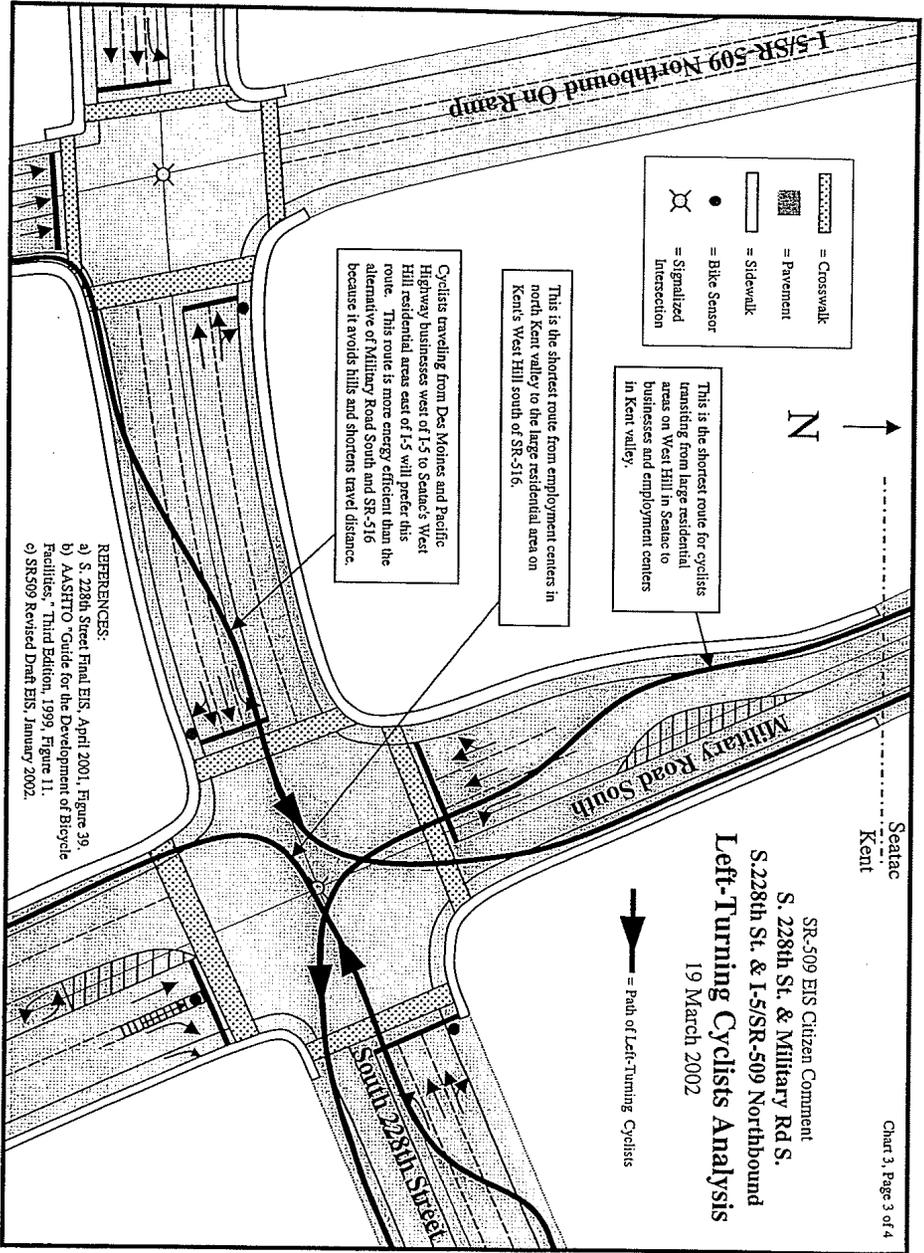
Chart 2, Page 3 of 4

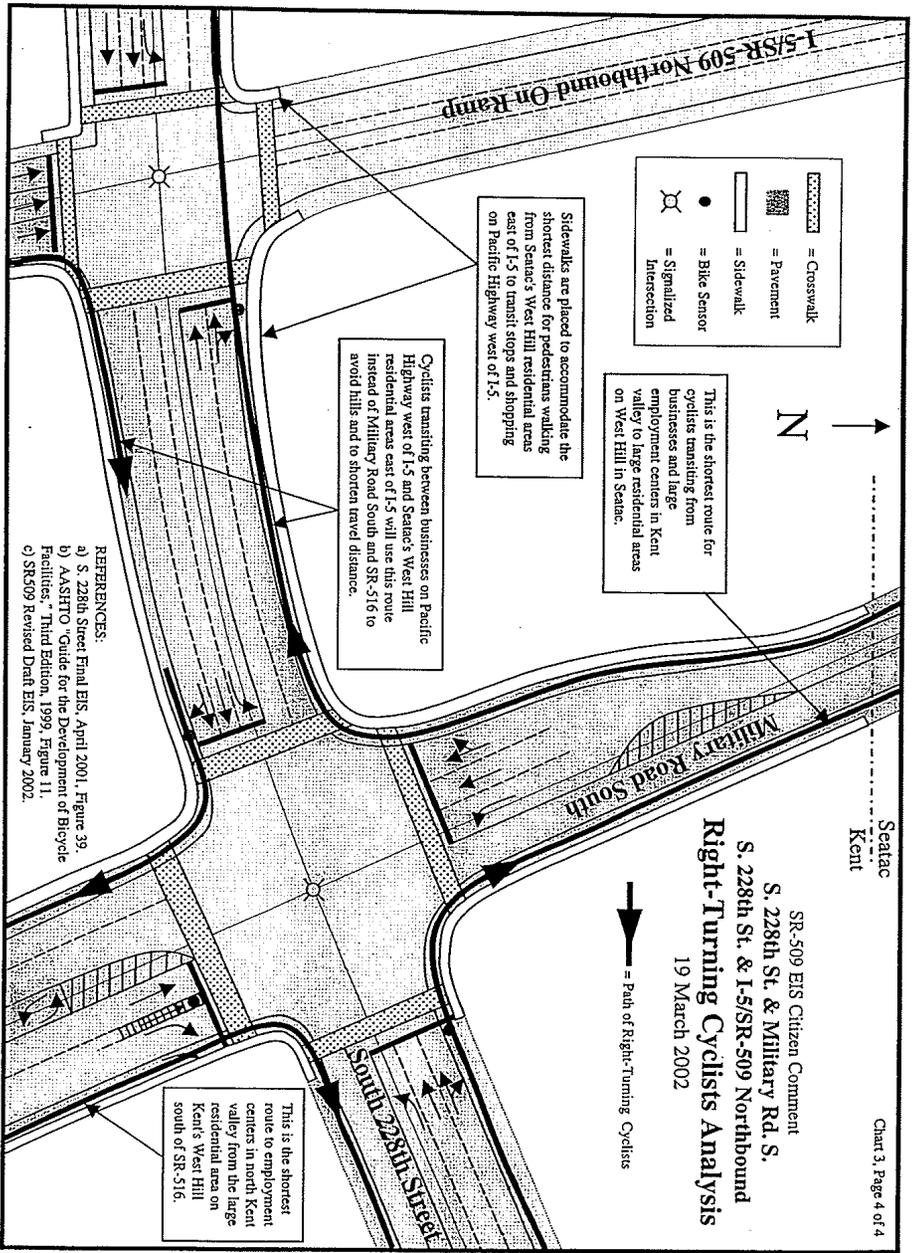
- REFERENCES:**
- a) S. 228th Street Final EIS, April 2001, Figure 39
 - b) AASHTO "Guide for the Development of Bicycle Facilities," Third Edition, 1999, Figure 11.
 - c) SR509 Revised Draft EIS, January 2002.











Continuity of shoulders eliminates the need for cyclists to swerve into the motor lanes. Continuity includes:

- *Adequate separation (3 feet or more) between fogline and curb (or pavement edge).
- *Paved surface uninterrupted by obstacles like curbs, drainage cuts across the direction of travel, raised or sunken manhole covers, and raised or sunken drainage grates.
- *Absence of long course pavement seams, ridges, cracks, and drainage grate slots oriented along the direction of travel.
- *Absence of rumble strips, raised buttons (especially closely-spaced buttons in double rows), turtles/bumps, and thick slippery thermoplastic symbols.

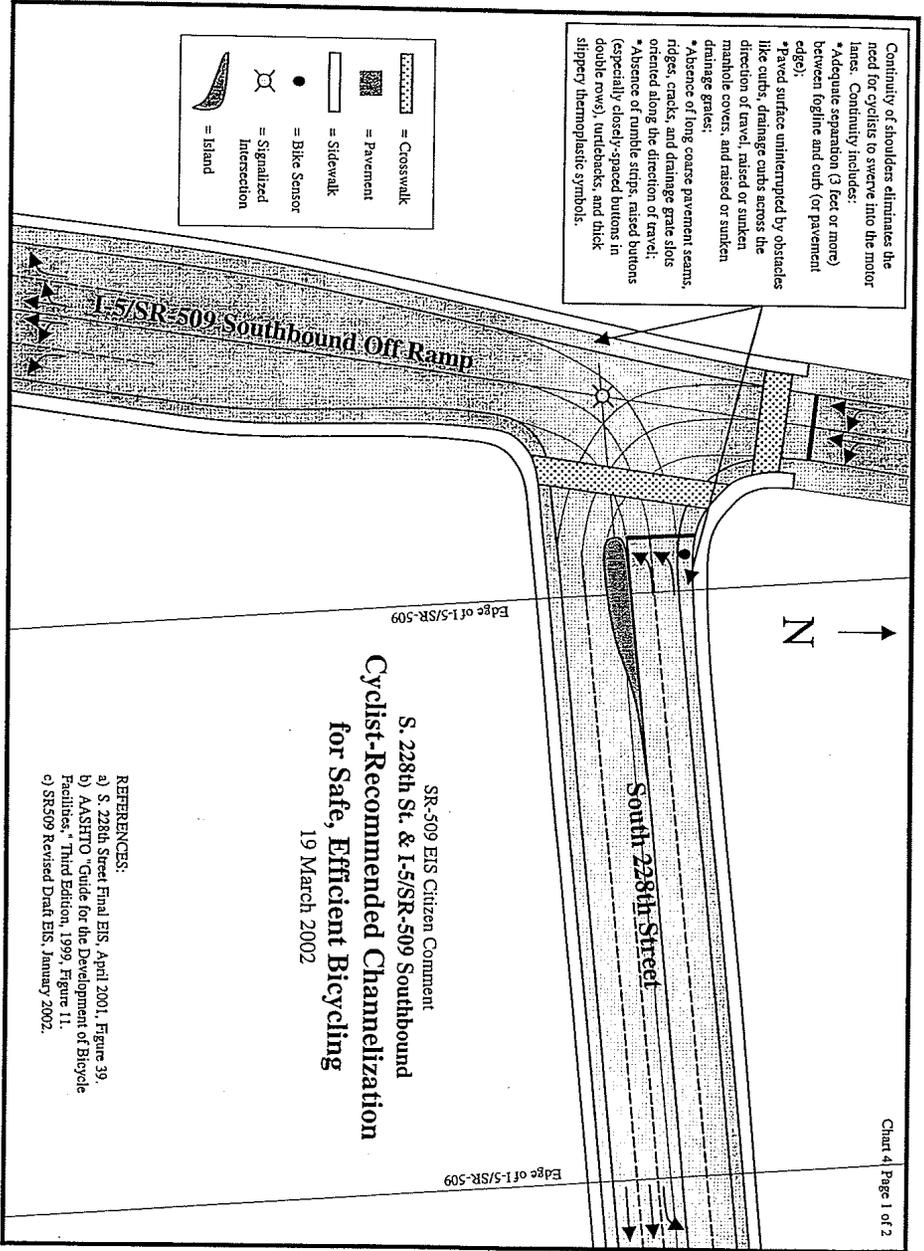
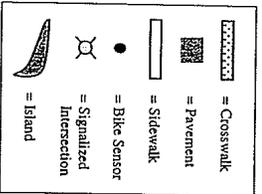


Chart 4 Page 1 of 2

SR-509 EIS Citizen Comment
 S. 228th St. & I-5/SR-509 Southbound
**Cyclist-Recommended Channelization
 for Safe, Efficient Bicycling**
 19 March 2002

- REFERENCES:
- a) S. 228th Street Final EIS, April 2001, Figure 39.
 - b) AASHTO "Guide for the Development of Bicycle Facilities," Third Edition, 1999, Figure 11.
 - c) SR509 Revised Draft EIS, January 2002.

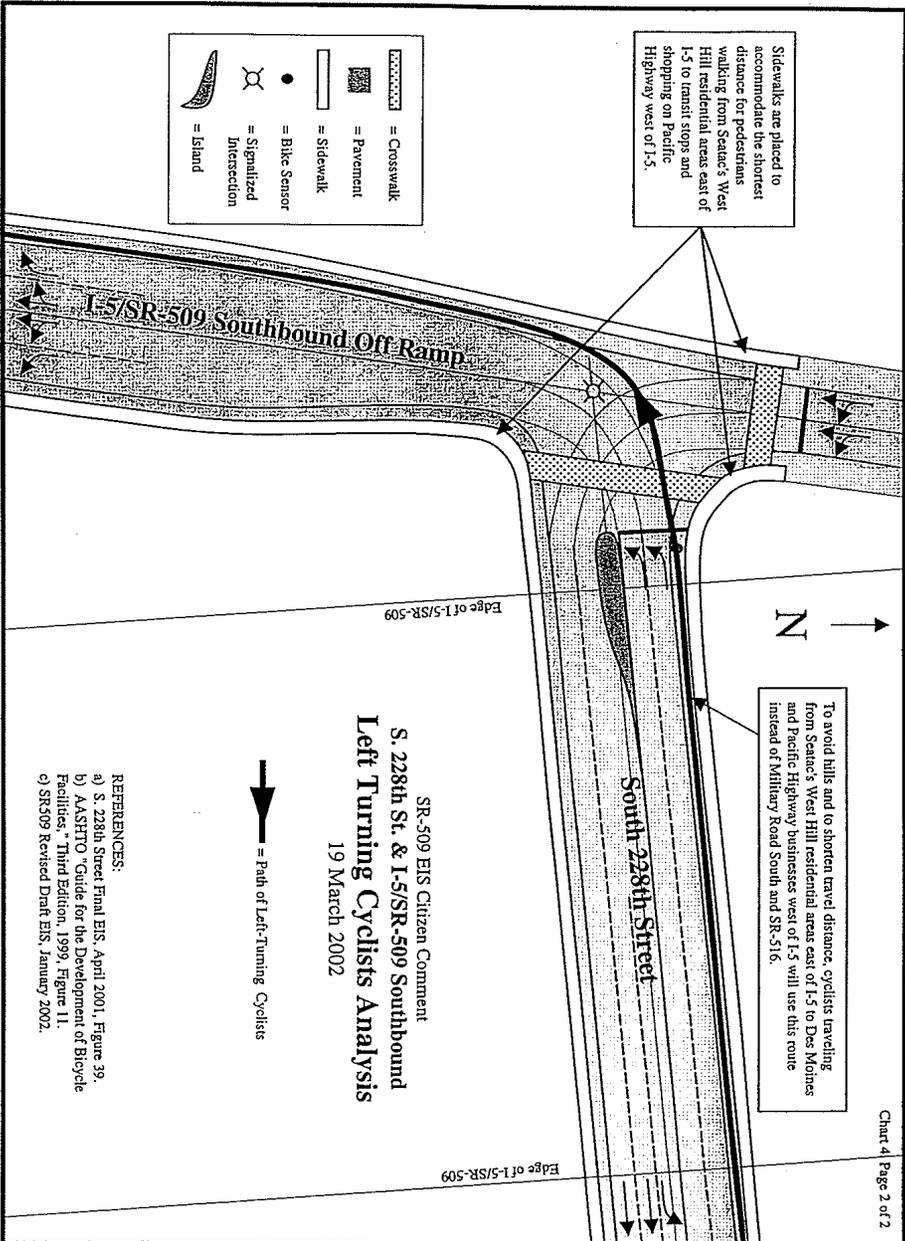
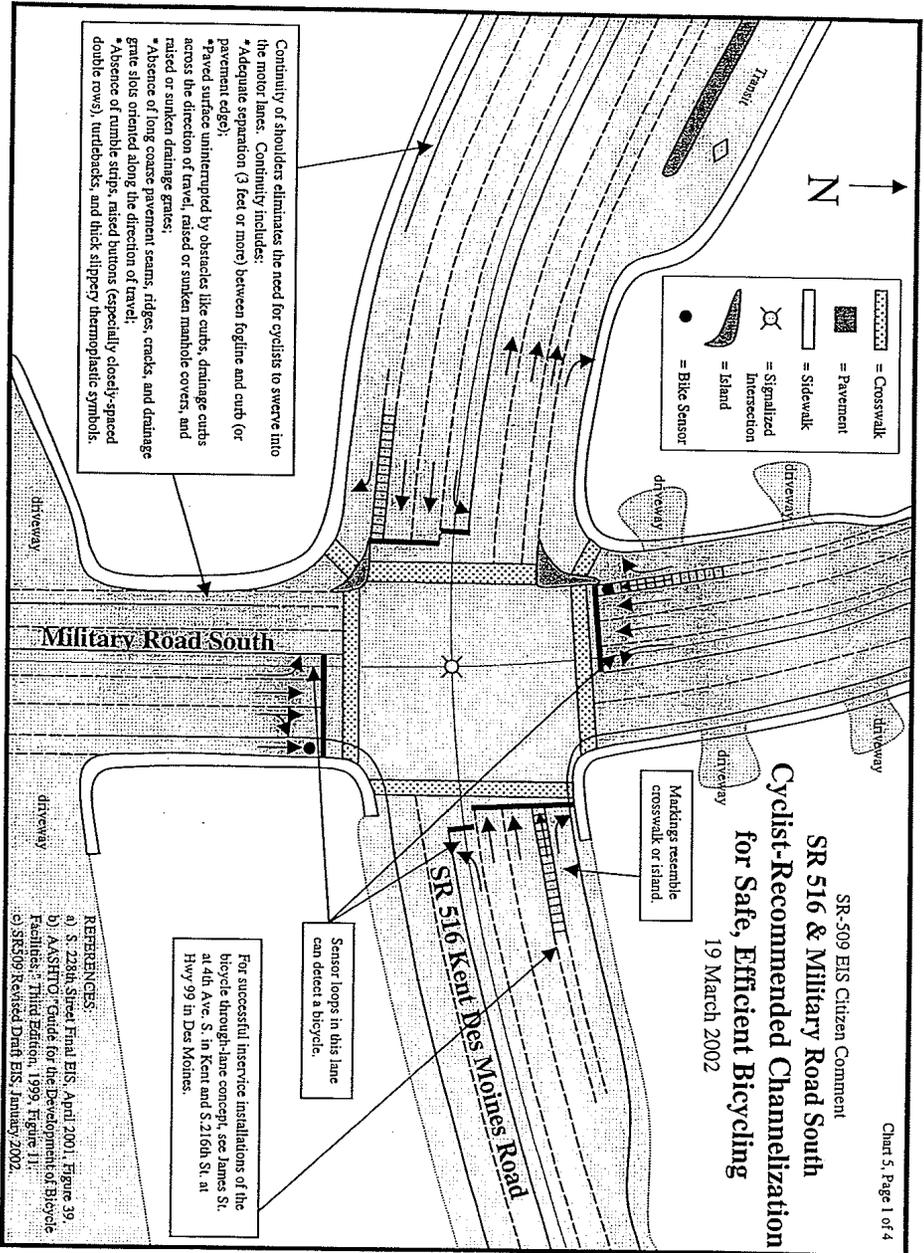
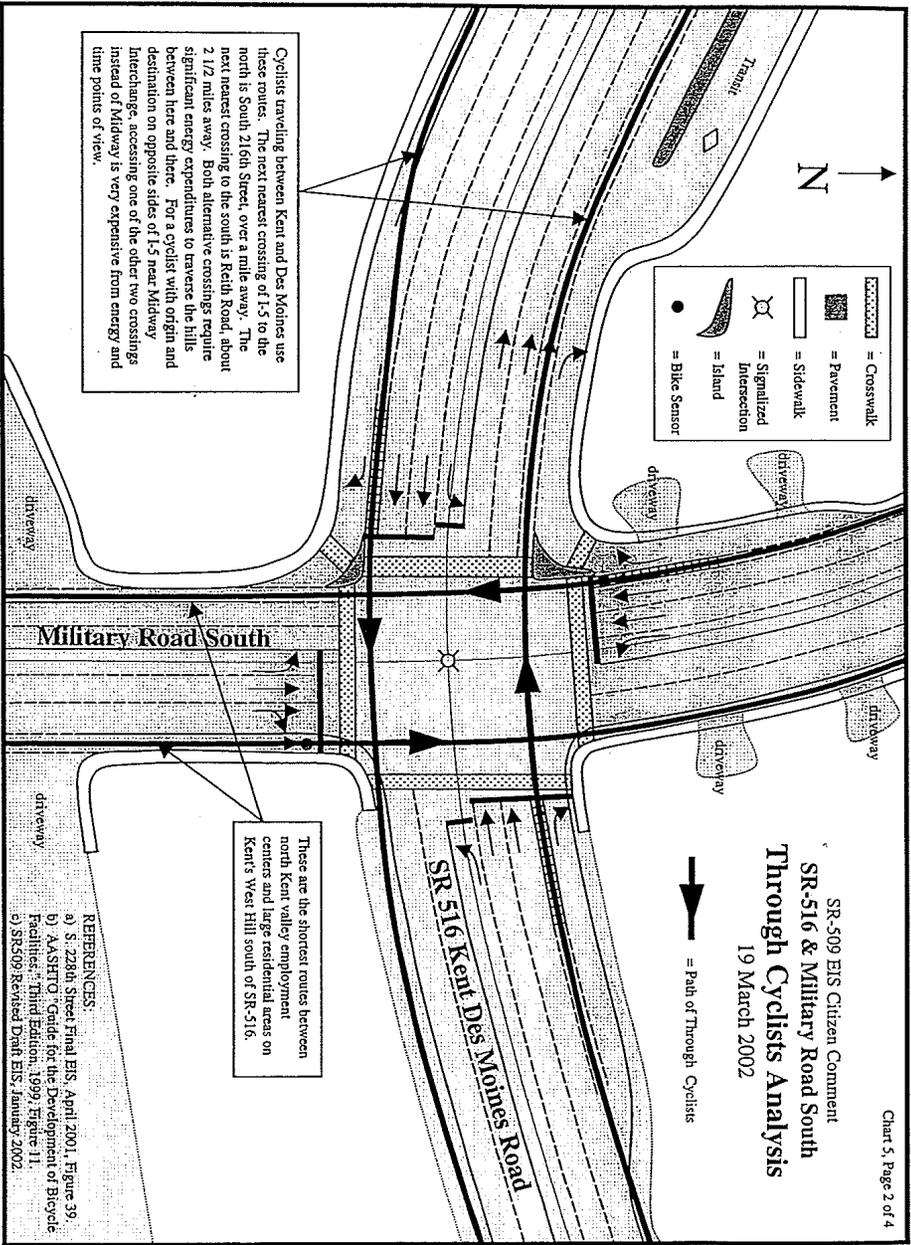


Chart 4 Page 2 of 2

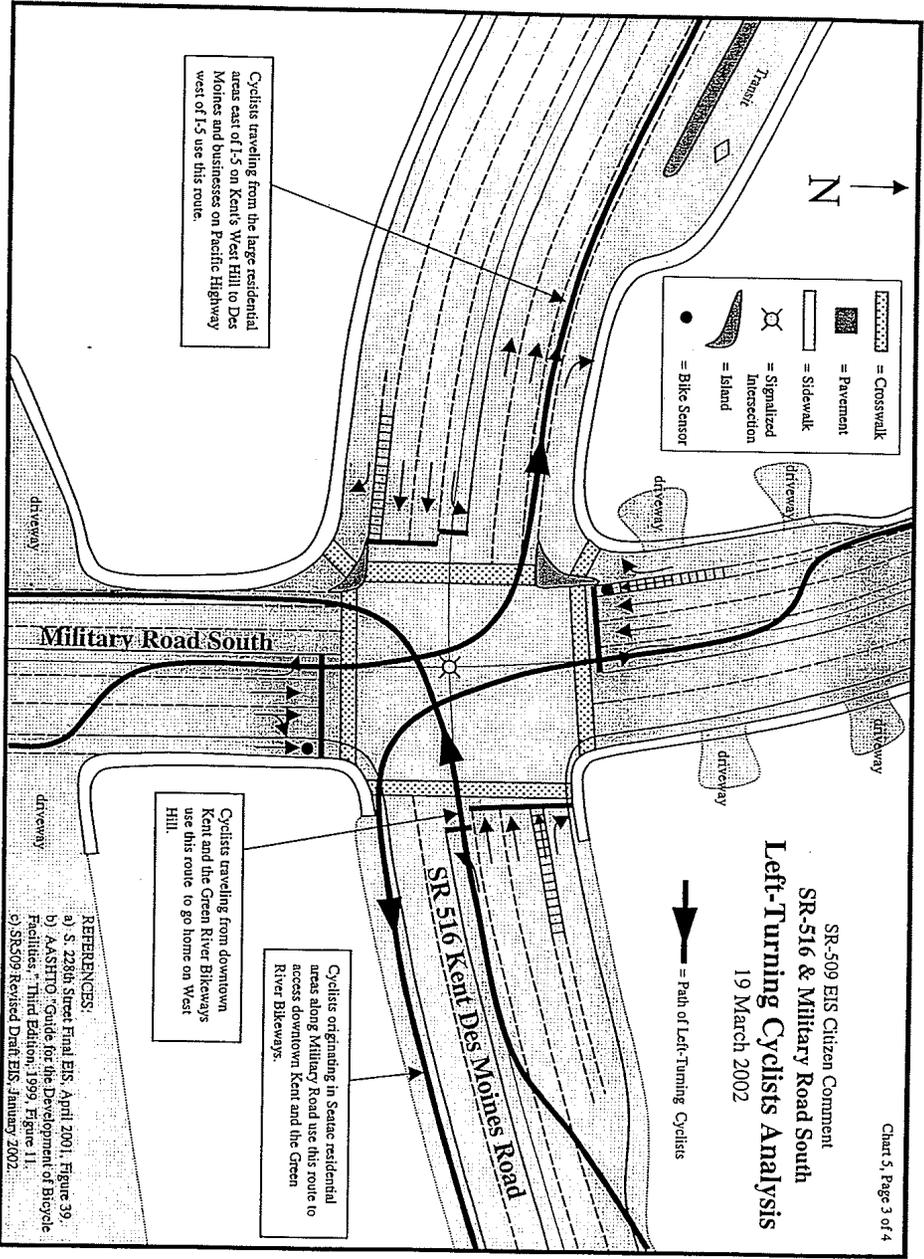
SR-509 EIS Citizen Comment
S. 228th St. & I-5/SR-509 Southbound
Left Turning Cyclists Analysis
 19 March 2002

- REFERENCES:**
- a) S. 228th Street Final EIS, April 2001, Figure 39.
 - b) AASHTO "Guide for the Development of Bicycle Facilities," Third Edition, 1999, Figure 11.
 - c) SR509 Revised Draft EIS, January 2002.





SR-509 EIS Citizen Comment
 SR-516 & Military Road South
Through Cyclists Analysis
 19 March 2002



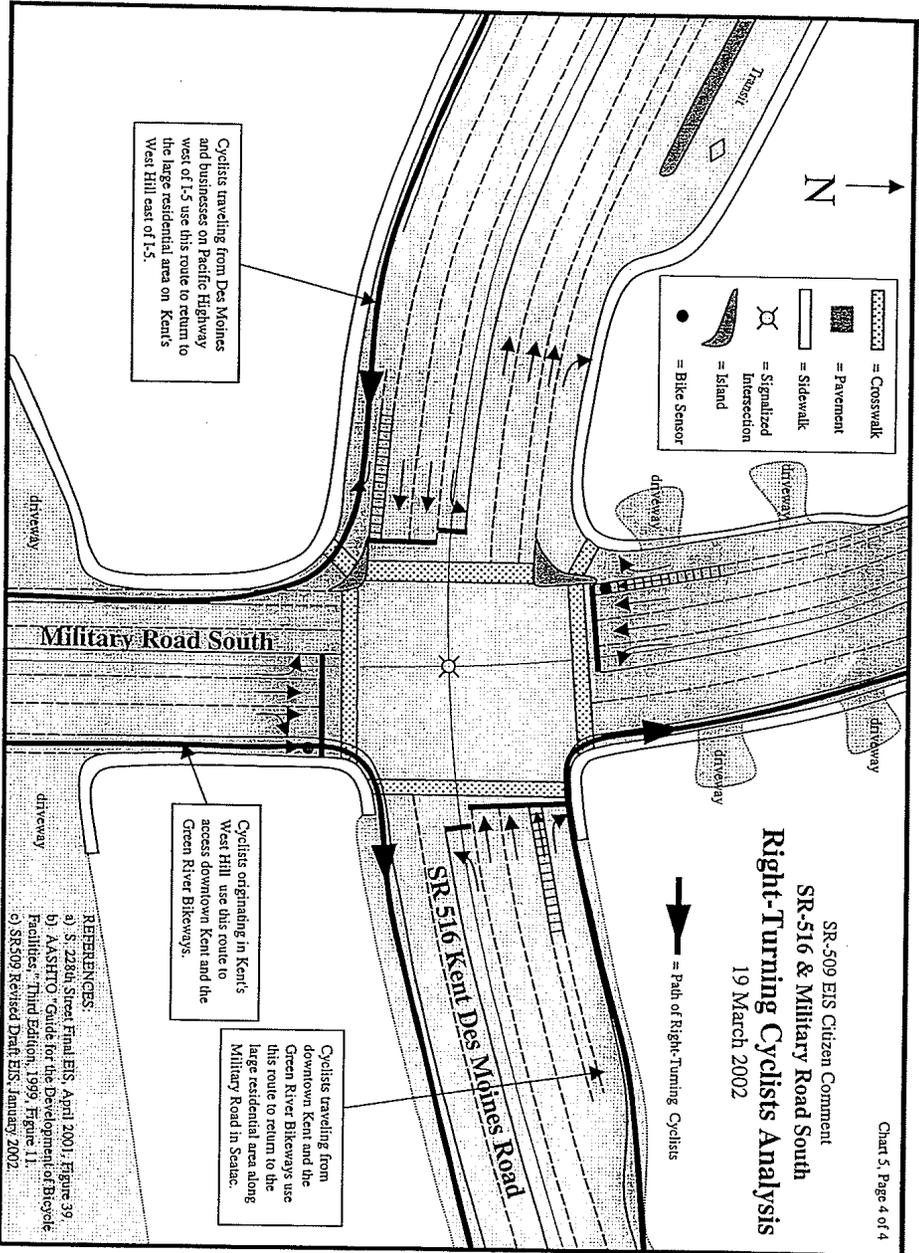
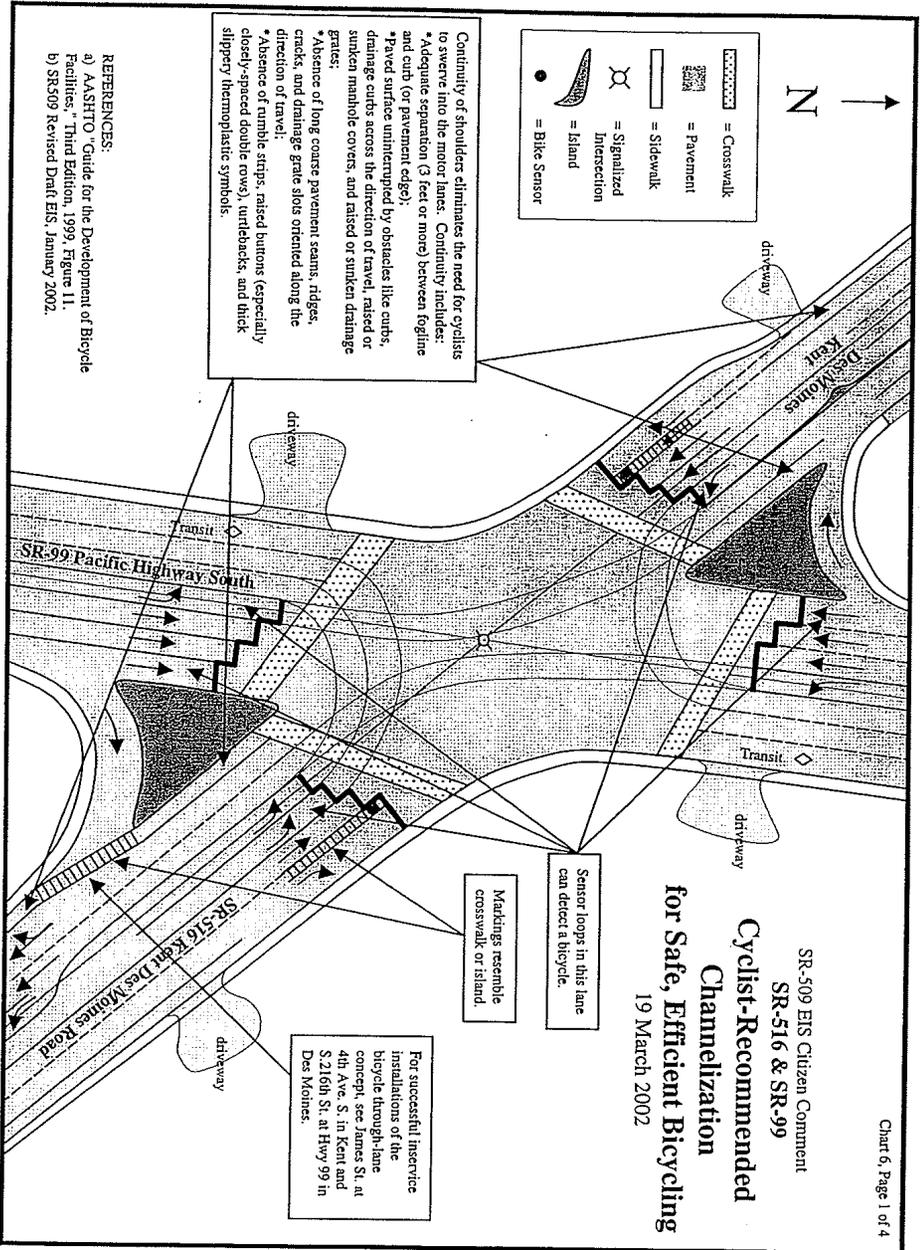


Chart 5, Page 4 of 4

SR-509 EIS Citizen Comment
 SR-516 & Military Road South
 Right-Turning Cyclists Analysis
 19 March 2002

- REFERENCES:
- a) S. 228th Street Final EIS, April 2001, Figure 39.
 - b) AASHTO "Guide for the Development of Bicycle Facilities", Third Edition, 1999, Figure 11.
 - c) SR509 Revised Draft EIS, January 2002.



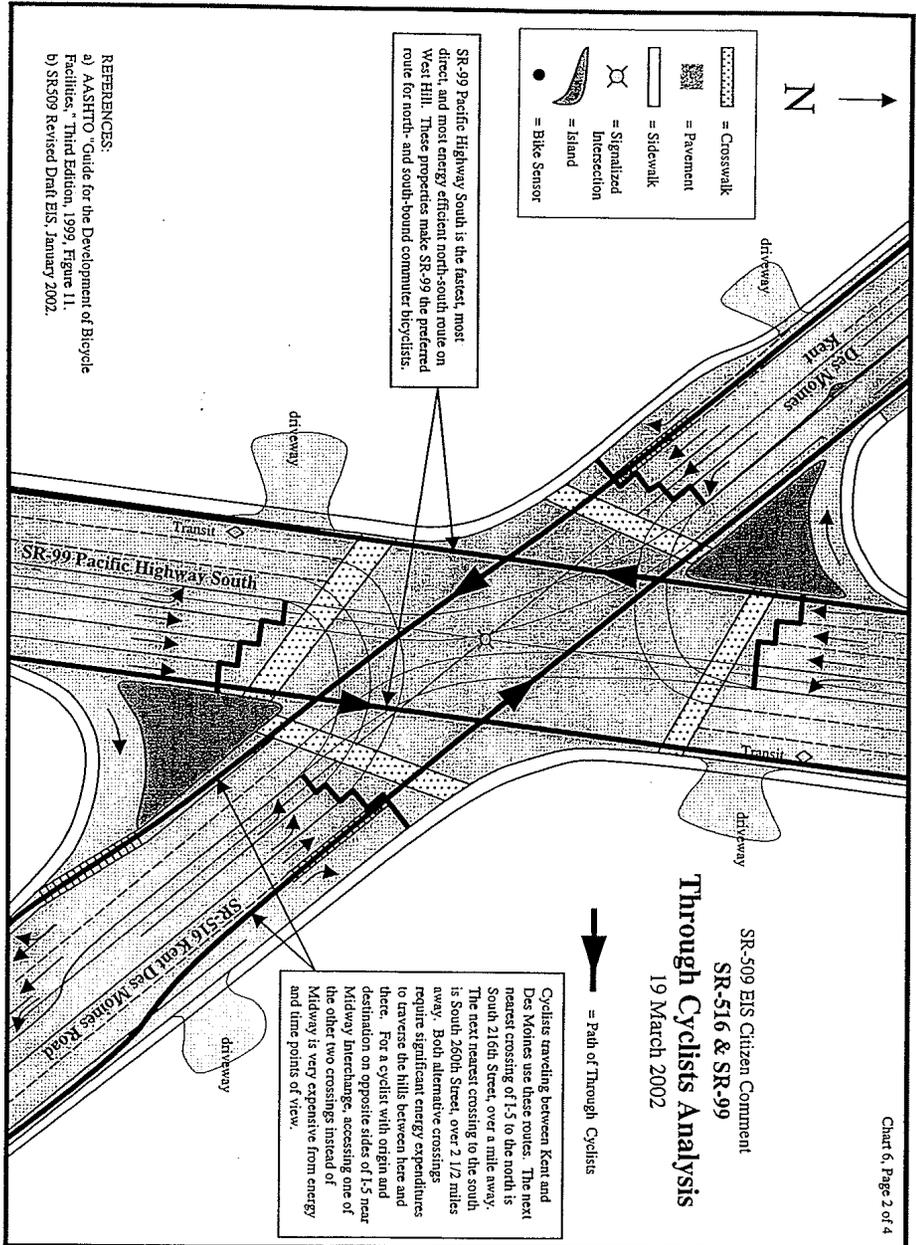


Chart 6, Page 2 of 4

SR-509 EIS Citizen Comment
 SR-516 & SR-99
Through Cyclists Analysis
 19 March 2002

→ = Path of Through Cyclists

- [Pattern] = Crosswalk
- [Pattern] = Pavement
- [Pattern] = Sidewalk
- [Symbol] = Signalized Intersection
- [Symbol] = Island
- [Symbol] = Bike Sensor

SR-99 Pacific Highway South is the fastest, most direct, and most energy efficient north-south route on West Hill. These properties make SR-99 the preferred route for north- and south-bound commuter bicyclists.

Cyclists traveling between Kent and Des Moines use these routes. The next nearest crossing of I-5 to the north is South 216th Street, over a mile away. The next nearest crossing to the south is South 250th Street, over 2 1/2 miles away. Both alternate crossings require significant energy expenditures to traverse the hills between here and there. For a cyclist with origin and destination on opposite sides of I-5 near Midway Interchange, accessing one of the other two crossings instead of Midway is very expensive from energy and time points of view.

- REFERENCES:
- a) AASHTO, "Guide for the Development of Bicycle Facilities," Third Edition, 1999, Figure 11.
 - b) SR509 Revised Draft EIS, January 2002.

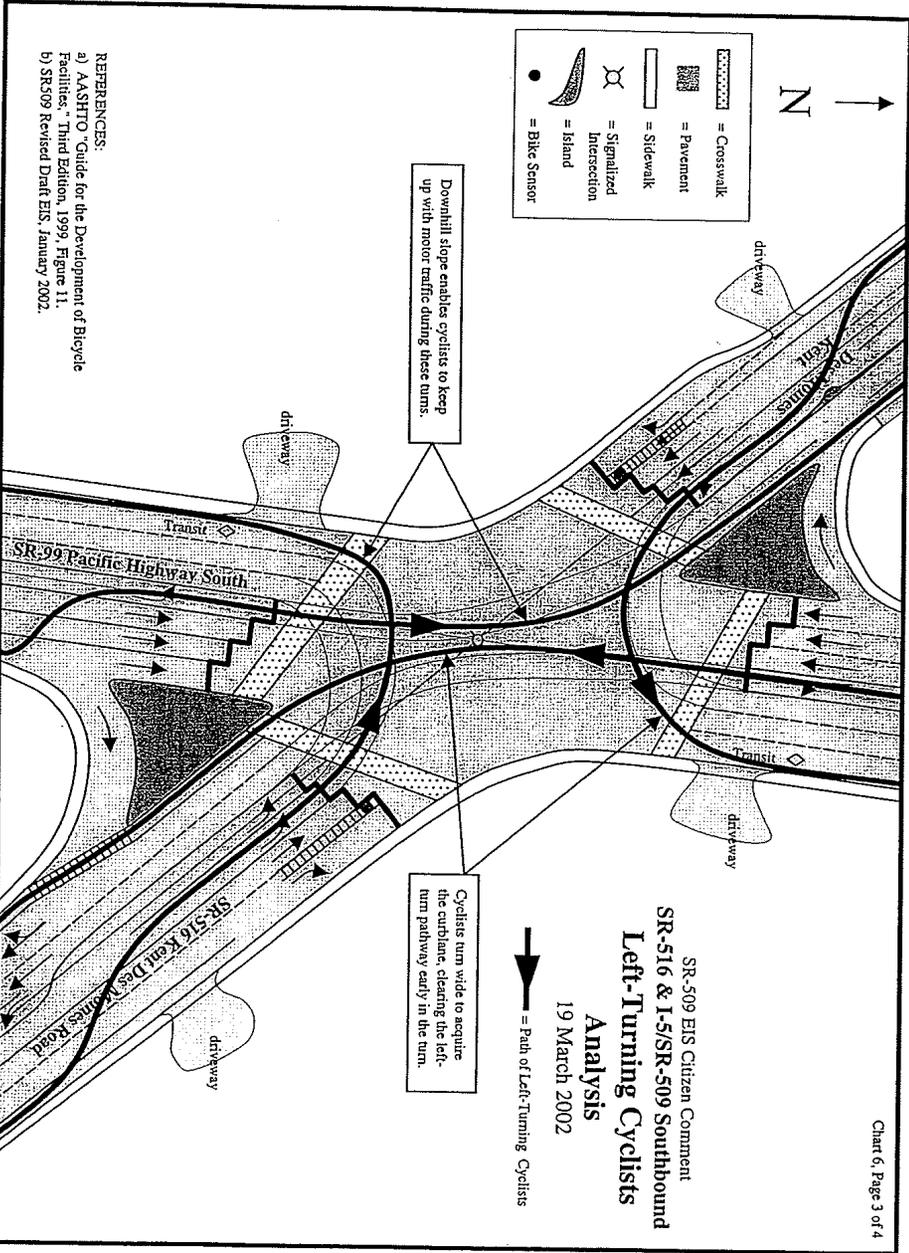
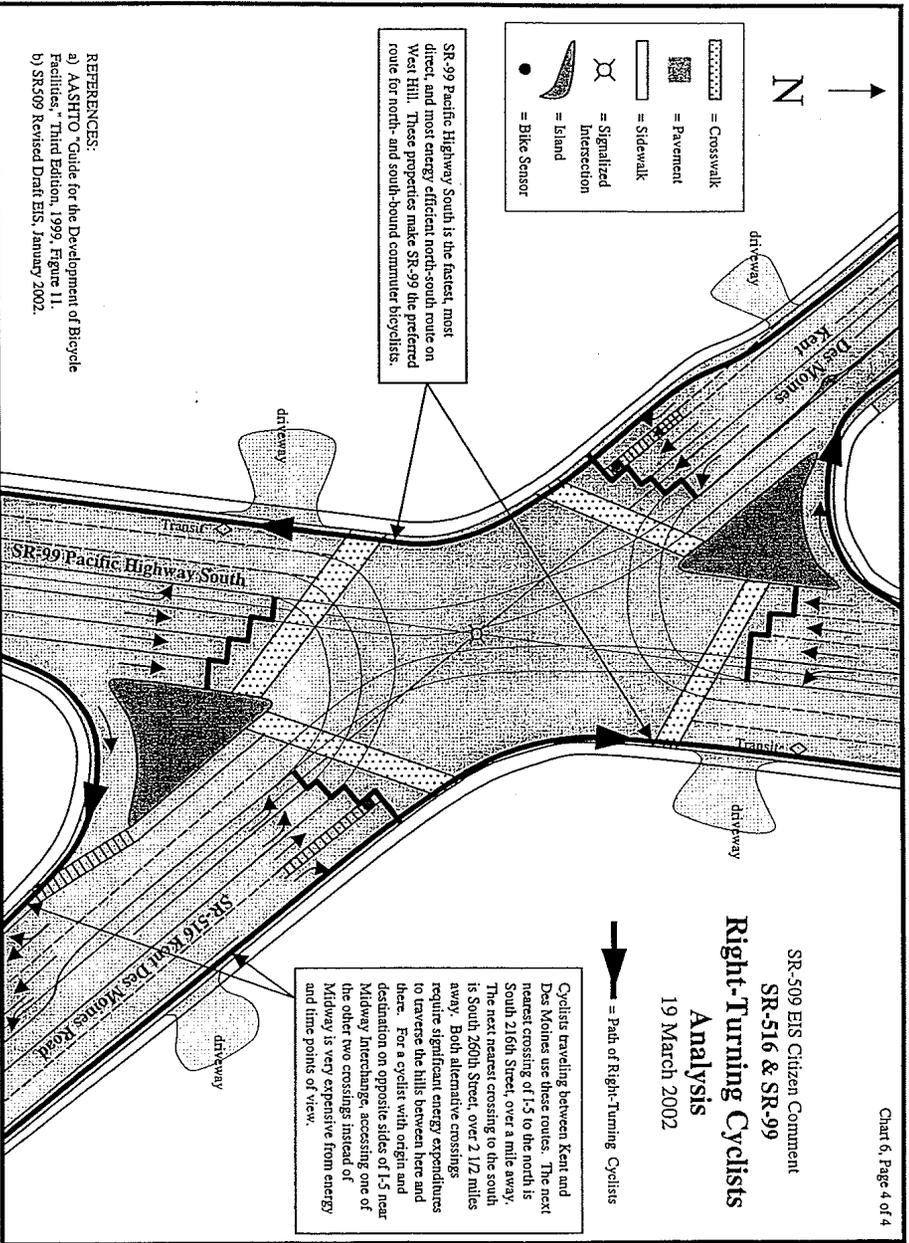


Chart 6, Page 3 of 4

REFERENCES:
 a) AASHTO "Guide for the Development of Bicycle Facilities," Third Edition, 1999, Figure 11.
 b) SR509 Revised Draft EIS, January 2002.

Chart 6, Page 4 of 4



REFERENCES:
a) AASHTO "Guide for the Development of Bicycle Facilities," Third Edition, 1999, Figure 11.
b) SR509 Revised Draft EIS, January 2002.

P3

The condo association comment, in case you do not have it already - John -----
Original Message-----
From: LORRAINE L DUBUQUE
Sent: Sunday, March 24, 2002 6:56 PM
To: whitejh@wsdot.wa.gov; everetts@wsdot.wa.gov; bagley@wsdot.wa.gov
Subject: SR509 and I-5 Corridor Project

Cc: Bob & Bev; Derrick; Marlette; Stacey
Sent: Sunday, March 24, 2002 6:52 PM
Subject: SR509 and I-5 Corridor Project

The cc:s and myself are a Condominium Association Board of Directors for Heritage Court Condominiums located at 22810 - 30th Ave So, Des Moines, WA. I know that several of us have been talking with various persons regarding the above subject. We have an appointment with Susan Everett to come to our May meeting and answer questions for us. We want to verify that this meeting is still going to take place in plenty of time so that we may send out an announcement to our Unit Owners. If you need to get a hold of me by phone, my number is 253-773-5788 - work or 206-870-4686 - home.

Just a little comment about our situation. Our property consists of 39 one-two- and three-bedroom units. Our buildings (3 in total) consist of three stories. It has a cabana that includes things like an indoor pool, a Jacuzzi, a handball court, 2 rest rooms, a storage room, a meeting room, a Ping-Pong table and a kitchenette for parties. We have garages, undercover and open parking spaces. It appears that we are the only condominium in the area. The rest of the neighborhood consists of apartments and single dwelling homes. We bought in this area because of the location (easy access to I-5, the airport, and Kent or Des Moines communities), the indoor pool and the rambler-like style of our units as well as having a fully functional cabana and indoor pool. We are a community that takes care of our property, our neighborhood and ourselves. We are law-abiding people who consider ourselves a very close-knit family.

When plans started developing to improve the Des Moines Pacific Ridge area, we were ecstatic. We knew that our neighborhood was definitely going to improve. When the plans were being finalized, we discovered that we are in direct line to have a major portion of our condominiums effected with the SR509/I5 Corridor expansion. The expansion as planned, has a direct impact to all the units. It cuts through our garages; cabana (indoor pool) and one corner the Building C. On our property we have a runoff water catch for all surface waters. We have joint hookup of water and electricity. It takes away some of the limited parking available. Last but not least, It will definitely reduce the value of our condominiums to have these things demonolished.

We are not asking you to stop the project and we applaud the efforts to connecting the Airport, SR509 and I5 as a unit and improve on the traffic congestion. What we are asking for is that a representative attend one of our condominium meetings in May to discuss the effects that will take place when this expansion gets underway. As it stands now, we are too close to the freeway and

Response P3-1

WSDOT staff attended the Heritage Court Condominium meeting on April 17, 2002, to answer questions about the project and acquisition process.

P3-1

P3-1
(cont.)

the pollution and sound is tremendous. When you get even closer, it will be definitely intolerable. We want to be sure that when the time comes that we are given consideration for relocation assistance to find a suitable and comparable site or a fair market value for the property. We would like to find out what our options are and what the timing is. We have several questions and concerns that affect us as a group.

COMMENT FORM

The Steering Committee wants your comments on the adequacy and completeness of the Revised Draft EIS. Please return this tonight or send your comments by **March 25, 2002** by mail, fax or email:

- John White, P.E., Project Engineer, Urban Corridors Office, WSDOT, 6431 Corson Avenue South, MS 61, Seattle WA, 98108
- Fax: (206) 768-5899
- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

SEE ATTACHED

Name PAT ASHCRAFT
Address 2848 S. 211th ST
City SEA TAC State WA Zip Code 98198
Phone: 206-878-8077 E-mail _____

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509

Thanks for your comments.

3/21/2002

TO: John White. P.E.
WSDOT MS 61
6431 Corson Avenue S.
Seattle, WA 98108

RE: Adequacy and Completeness of RDIES SR509/I-5 Road Project

P4-1

With present day computer capabilities, a map showing detailed-labeled major highways and all cross streets involved should be possible.

P4-2

The actual joining of SR509 to I-5 has been written in the vicinity of S 210th, S 211th and S 212th. Vicinity of, in my opinion, is not adequate nor definitive.

The fact that increased capacity on I-5 has been more adequately addressed is a positive. Over the years it has been planned to just divert traffic to a virtual parking lot. Extending capacity to S 310th is a much better plan.

P4-3

There seems to be minimal differences between any of the alternatives (except no build) as 32 major environmental impacts state "SAME AS ALT. B."

P4-4

I find it hard to believe that NO long term air quality impacts are noted on any of the alternatives in the summary of environmental impacts. The bottom bullet on Pg. 2 of the Project Newsletter clearly states - the SR509 extension alleviates congestion and AIR POLLUTION on Southcenter Hill and various arterial streets in SeaTac, Burien, Des Moines and Normandy Park. Seems to me if pollution is being alleviated (moved) from so many sources there is bound to be a concentrated increase on the extension. This pollution will waft up to the Mansion Hill community, especially from truck traffic.

I am elated that as of this latest configuration our home, yard, the Angle Lake Well and holding pond will not be bulldozed. We will be impacted by noise and fumes but as this stage of life we spend less time outside. I do have empathy for those who will lose their homes, including those who have purchased in the last few years and were unaware of the road plan.

While realizing my input is not relevant nor will be seriously considered, I would rather have Alt. B. be the build design. It offers a little longer road and is much farther from Mansion Hill. The latter is a selfish reason but after seventeen years of limbo, meetings, worry and hoop jumping I feel I am entitled.

Pat Ashcraft 2848 S. 211th SeaTac, WA 98198 206-878-8077



Response P4-1

Major highways and arterial streets are labeled on the figures. Secondary cross streets are not labeled to minimize clutter on the figures.

Response P4-2

The location of the proposed SR 509/I-5 interchange varies among the alternatives, and is not associated with specific intersections. The proposed interchange locations are shown in Figure 2.3-6, 2.3-7, and 2.3-8.

Response P4-3

Several of the proposed improvements and their associated impacts are similar for each of the alternatives. Differences among the alternatives are summarized in Table S-1 and described in detail for each element of the environment in Chapter 3.

Response P4-4

The SR 509 project would not result in any significant long-term air quality impacts. The project would shift the location of some pollutant emissions, but would not result in pollutant levels exceeding the standards; therefore, there would not be any significant adverse impacts.

P5

March 24, 2002

To: John White, P.E., Project Engineer
Washington State Dept. of Transportation (WSDOT)
6431 Corson Ave S., MS 61,
Seattle, WA, 98108
whitejh@wsdot.wa.gov

Subject: Comments Submitted March 24 on SR509 Corridor Completion/I-5/South
Access Road Project to the Dept of Transportation

Please contact me if you have any questions or require substantiating data. This submittal includes four electronic files in case size limitations on email are an issue.

arleneSR509commentsMar25.doc
arleneAtt C airhealth2001.ppt
arleneAtt D Corps Nov99.doc
arleneAtt E 3rdtry POSpermit.doc

Thank you for this opportunity to comment. I just hope this effort wasn't a waste of my time or your time. Politics in Seattle seems to ignore physics, economics, engineering, topography and any regulation they don't like.

Submitted by Arlene Brown
239 SW 189 PL
Seattle WA 98166
Home (206) 431-8693

For your address book, use my permanent e-mail arlene@mail.alum.rpi.edu - forwards to my current ISP.

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Summary

Section 3.17, "Secondary and Cumulative Impacts" so understates the situation, it borders on fraud. The omissions and inaccuracies I do not believe are intentional on the part of the DOT but rather due to insufficient information being provided by the Port of Seattle and their representatives. Steps need to be taken to avoid Clean Air Act violations and premature death from excessive noise and air pollution.

If regulations are enforced and best management practices implemented, it will be cost prohibitive for the SR 509 extension/South Access Road project and the Sea-Tac third runway project to co-exist. The cumulative impacts on the wetlands, creeks, aquifer, noise, air pollution, salmon, Puget Sound resident orca pod, bald eagles and people are so great they are unimaginable. These impacts result in more flooding, more earthquake damage, more illness, more deaths and less drinking water. Ultimately, it will lead to Clean Air Act non-compliance whose costs will fall on King County's business community.

Site Seismicity beginning on RDEIS Chapter 3, Page 3-55 needs a major overhaul to include the data collected since 1985 such as the February 2001 quake information and the SHIPS program data (see Attachment A). A geological survey is needed that specifically looks for soft soils. In addition, the interaction of the 3rd runway's record-breaking wall with soft soils and the amount of damage that will cause to SR509 overpasses and roads in an earthquake, needs to be calculated.

Ignoring the intent of the FAA's Runway Protection Zone rules is questionable. However, the clear violation of the FAA's Object Free Area rules is so serious that the project should not proceed without written permission from the FAA that is accompanied by a risk analysis. The State's lawyers may also want to review the rules to determine legal liability in the event of a lawsuit.

Even in the absence of the third runway, the mitigation for this project needs to be more than normal because the area is already so unhealthy due to the airport and has unique

characteristics such as high ongoing vibration exposure. A much larger buy-out area, more noise barriers, more gradual slopes, and a plan to ensure a steady supply of uncontaminated drinking water, etc. is needed.

It is obvious reading through this document that it has not had the level of engineering scrutiny this would have had if the Cities or any major citizens groups were against this project. Although I too support the concept of extending the “highway to nowhere” for the sake of King County, as currently written it underestimates hazards, provides inadequate mitigation and does not offer reasonable assurance of compliance with environmental or FAA regulations. It’s UNSAFE.

Violates FAA Object Free Area (OFA) Rules

FAA Advisory Circulars are considered mandatory in order to be eligible for Federal funding. Paragraph 307 of FAA Advisory Circular Airport Design AC150/ 5300-13 states “Objects non-essential for air navigation or aircraft ground maneuvering purposes are not to be placed in the OFA. This includes parked airplanes and agricultural operations. Tables 3-1, 3-2 and 3-3 specify the standard dimensions of the runway OFA. Extension of the OFA beyond the standard length to the maximum extent feasible is encouraged. See Figure 2-3.” (electronic page 33 of web <http://www.faa.gov/arp/pdf/5300-131.pdf> version). Para 212 a (2) expressly forbids automobile parking lots in the OFA.

For the long runway at Sea-Tac, the Object Free Area (OFA) extends 1000 feet from the runway end and is 800 feet wide (It’s a rectangle within the trapezoidal RPZ). The highway goes right through the object free area for this runway. Is the plan to discontinue flying large jets out of Sea-Tac so the OFA will be shorter or have you arranged for the FAA to ignore their own safety rules? If it’s unsafe for parked aircraft, potatoes, or parked cars, why is it safe for commuters in vehicles that contain fuel? Has this exception to the rules been approved by the FAA? If an accident occurs will the victims sue Washington State and the FAA for damages?

Response P5-1

The proposed project alternatives do not cross the airport object free area (OFA). Alternatives C2 and C3 cross through the southern one-third of the extended object free area (XOFA), which is part of the runway protection zone. Although FAA guidelines recommend location of proposed roads outside the XOFA, it is not prohibited. The FAA and the Port of Seattle have determined that the proposed alignment within the XOFA is acceptable provided it is located as close to the southern extent of the XOFA as possible. Please refer to Chapter 2 for a discussion of coordination with FAA in developing the project alternatives.

P5-1

P5-2

Will de-icer that rots the stomach of fish when present in only parts per billion fall onto moving vehicles and be spread further than it is already? (De-icer has very deadly proprietary ingredients in it. It is not just harmless glycol as some assume.)

Will the frozen contaminated toilet chemical crystals that fall from leaky aircraft toilets land on vehicles and spread their germs even farther than currently? They contain viruses that our sewer treatment plants are not strong enough to treat.

Encroaches on Runway Protection Zones

FAA Advisory Circular (AC) for Airport Design, AC150/ 5300-13, Change 4, Table 2-4, Figure 2-3 and Figure 2-4 defines the Runway Protection zone dimensions (<http://www.faa.gov/arp/pdf/5300-131.pdf>). The AC defines the Runway Protection Zone (RPZ) as “An area off the runway end to enhance the protection of people and property on the ground” (page 15 of pdf version). Section 212 provides more information such as expressly forbidding a church, mall or a golf club house but does permit a golf course.

P5-3

There can be a little more latitude with the area of the RPZ’s that is outside the OFA area when the airport does not own the property and is unable to buy the property. However, in this situation it would be difficult to justify the exception, particularly since fuel storage facilities are strictly forbidden in the RPZ. Busy highways are a continuous conveyor belt of fuel.

Violates FAA’s Object Clearing Criteria

Item 8 of Para 211, Object Clearing Criteria of AC150/ 5300 states:

P5-4

“Other objects which require clearing are those that generally can have an adverse effect on the airport. These include objects in the inner part of the approach (coinciding with the RPZ) such as fuel handling and storage facilities, smoke and dust generating activities, misleading lights, and those which may create glare or attract wildlife.” (page 25 of pdf file).

Will the highway traffic lights interfere with landing and take-offs?

Response P5-2

This comment pertains to operations of aircraft near Sea-Tac Airport. WSDOT and FHWA do not have authority over airport operations. Please address comments and concerns about airport and aircraft operations to FAA and the Port of Seattle.

Response P5-3

FAA and the Port of Seattle have determined that locating the proposed roadway in the southern one-third of the runway protection zone is permissible under FAA regulations. Please see response to Comment P5-1 above. FAA Advisory Circular 150/5300-13 restrictions regarding fuel storage facilities pertain to aboveground and underground single storage tanks, and do not include motor vehicles.

Response P5-4

Please see responses to Comment P5-1 and P5-3 above.

Highway lighting would be designed to minimize light pollution and would be in accordance with FAA guidelines.

P5-5

2 to 1 slopes Ignore airplane vibration induced damage

3 to 1 slopes are recommended for wetlands areas and are also part of the FAA building codes for reasons unrelated to wetlands. 3 to 1 slopes, or perhaps even less steep, are needed because the close proximity to the runway ends greatly increases the amount of vibration the construction, and then later the actual roads, will be subjected to. Close proximity is an understatement since the plan is to build where it's expressly forbidden to build by FAA AC 150/5300.

To make matters even worse, we have a very active underwater ground water system that moves the earth: We are the highest portion of the large aquifer system and we have a large number of small earthquakes. These movements combined with the aircraft vibration all make this an unusually complex build site. Since aircraft at the airport vibrate the earth all the way into the heart of Normandy Park, can you imagine the amount of vibration the earth will feel in the Object Free Area! Flight paths have even been moved temporarily away from Magnolia during heavy rainstorms to avoid landslides.

One of the reasons the Port now faces building a record-breaking wall is because the EIS called for 2 to 1 slopes that the Army Corps of Engineering objected to. (I refer to it as a record-breaking wall since it's only four tiers when you would expect it to be at least seven to even remotely resemble the few other tall MSE walls. More of Miller Creek would need to be moved and soft soils excavated over a large area if they wanted to build a safe MSE wall.)

P5-6

Inability to protect airport with highway in runway protection zone

The road going through the runway protection zones is inconsistent with FAA building criteria. It will be very easy to shoot at an aircraft and speed away on the highway.

P5-7

Grossly underestimated secondary and cumulative Impacts

The SR509/South Access Road plan induces growth contrary to the assumption in 3.17.1. It will induce so much air traffic and airport related ground traffic growth that ozone exceedences will occur unless measures are taken to cap pollution.

Response P5-5

Most slopes for the new roadway would be 3:1 or shallower. Slopes adjacent to the RPZ will be no more than 6:1. All slopes would be designed to be stable in accordance with WSDOT design standards, which take into account local environmental conditions that could affect stability.

Response P5-6

Please see responses to Comment P5-1 and P5-3 above.

Response P5-7

The SR 509: Corridor Completion/I-5/South Access Road Project is consistent with local and regional land use plans, which have already addressed growth. Although the proposed project would support and facilitate planned growth within designated urban growth boundaries, it would not induce growth.

The PSRC models conformity to ozone standards. The proposed SR 509: Corridor Completion/I-5/South Access Road Project is included on the 2001 to 2004 project list of the Regional Transportation Improvement Plan (TIP) that has been determined to conform to the State Implementation Plan (SIP). Please refer to Section 3.1, Air Quality, for a detailed discussion regarding ozone.

P5-8

A cumulative pollution analysis of the proposed third runway and SR509 is essential to the SR509 project. So essential, that if done with sound engineering judgment, you will realize the **two projects are completely and totally incompatible**. Combined they simply create too much impervious surface, too much air pollution, too much ground water pollution, it's too hard to control flooding, too much noise and greatly reduces the health and life expectancy of the residents. Since the Sea-Tac Master Plan Update never even did an environmental analysis on the impact of 1,500,000 haul trucks on Puget Sound region and did not have a record-breaking wall that would reflect noise, you can hardly think they would have really adequately addressed the SR 509 extension. They said the analysis would be done as part of THIS plan.

P5-9

The RDEIS plan also makes the “highway to nowhere” a preferred route for many commuters that completely bypass Burien currently. Other than an increase in airport haul truck traffic, there has not been a dramatic change in traffic on SR509 since 1979 when I first started using it regularly for the sections south of SW 128 St in Burien. SR 509 will forever dramatically alter Normandy Park and Burien.

P5-10

Identify fill quantity, source and cost

The SR509 EIS does not appear to identify the quantity of source of any fill needed for this project. The proposed Sea-Tac third runway will use up most of, if not all of western Washington’s supply of permitted fill making a huge fill shortage. Any fill needs must be addressed in the EIS.

You should not make the same mistake as the third runway that hoped they would be able to use a significant amount of the existing dirt. Contamination, peat bogs, wetlands, drinking water aquifer, federally protected wellhead and creek concerns make it difficult to use fill in the area.

Also available western Washington fill is likely to be toxic. The DOE is attempting to set the fill contamination criteria for the third runway to be equal to the state’s toxic clean up level, presumably due to the difficulties of finding clean fill. For instance, the third

Response P5-8

The proposed SR 509: Corridor Completion/I-5/South Access Road Project has been analyzed in conjunction with other planned and programmed regional transportation projects as part of Destination 2030 (the Puget Sound Region Metropolitan Transportation Plan). The analysis demonstrates that transportation air quality emissions within the Puget Sound region would be within the region’s emissions budget in 2020 and 2030. The regional emission budget is established to ensure that the region remains in attainment for the National Ambient Air Quality Standards, which are established to be protective of human health and welfare. Please refer to Section 3.1 for a detailed description of the PSRC conformity analysis.

The stormwater treatment for the SR 509 project and proposed mitigation would reduce flows in Des Moines Creek Basin and, therefore, the potential for flooding. Please see response to Comment A3-6 from the Environmental Protection Agency.

The proposed stormwater treatment for the SR 509 project would be designed to protect groundwater quality. Please see response to Comment P5-12 below.

Additional noise analysis has been conducted for the SR 509 project and has taken airport noise into account at noise-sensitive areas within the project study limits. Please see Appendix I of this EIS.

Response P5-9

The purpose of the proposed project is to connect the existing SR 509 freeway with the regional transportation network and relieve congestion. The existing SR 509 freeway is currently underutilized because it lacks a connection to and from the south, contributing to congestion on local streets and major roadways in the area that are already at capacity. Please refer to Chapter 1, Purpose and Need for Action.

Response P5-10

For each of the proposed alternatives, the quantity of material generated during excavation would exceed the required fill. Therefore, there would be a net export of fill material.

runway Clean Water permit that has had a “stay “ against it since fourth quarter 2001 allows lead at more than 10 times background level, arsenic at more than three times background level as well as toxic man-made chemicals not found naturally.

Toxic Soil Handling and Mitigation required for Workers & Neighborhood

Before disturbing any soil, contamination tests need to be run because it is on top of an aquifer with fractured till and contamination is likely due to ASARCO and airport activities. Special handling techniques will be needed to address worker safety issues, public health issues as well as air pollution issues.

P5-11

Recent DOE studies in conjunction with Seattle- King County Dept of Health have revealed unusually high metal contaminants in soils in Normandy Park and the surrounding area. For example, they had a lead reading of 490 compared to the clean up level of 250. Some of the toxics are attributed to ASARCO. The DOE only tested enough chemicals (arsenic, lead, antimony, bismuth and a couple of others) to confirm the area was in Asarco’s path, and did not identify the full extent of ASARCO chemicals that have polluted the area.

It is also known that there is contaminated soil on airport property from airport activities and that contamination was left behind when the Port of Seattle bought out properties.

Topography and winds are obviously a big factor so more tests are needed to determine the extent of pollution prior to construction so the proper mitigation measures can be taken.

Admit to total Destruction of Des Moines Creek

The new South Access road to the airport is so close to the Des Moines Creek that it means either a slow or fast death to the creek and contamination of the aquifer that is only about 2 feet from the surface of the ground in that location. The plume of sediment toxics that surround highways are well known by the toxic sediment community. The creek will have to deal with pollution from the Highway plus the new airport road plus the airport. What other projects will impact that area? What happened to SASA?

P5-12

Response P5-11

Soils in the SR 509 project area could be contaminated with arsenic from ASARCO. Soils in areas that would be cleared, grubbed, and excavated would be tested to determine the level of contamination in relation to Washington State cleanup levels. Any materials that exceed cleanup levels would be treated or disposed of in accordance with state and federal regulations.

Response P5-12

The proposed stormwater treatment would protect both groundwater and surfaces water draining to Des Moines Creek. Stormwater generated from the highway in the Des Moines Creek Basin would be infiltrated where subsurface conditions are favorable. Groundwater is shallow in some locations within the project area, but is more than 2 feet below the surface. The infiltration facilities would be constructed only at the locations where groundwater is sufficiently deep so infiltration from the bottom of the infiltration facilities would not be impeded by a high groundwater table. At all these locations, water would be treated before being released to the infiltration facilities and before reaching the groundwater. Infiltration into the soil would not occur near the known public wells. Where infiltration is not feasible, stormwater would be treated and detained, after which it would receive enhanced treatment in constructed wetlands to remove metals and other pollutants.

A toxic plume of sediment in the creek would not occur. Analysis of pollutant concentrations for the runoff exiting stormwater treatment facilities indicates that the concentration of total suspended solids (TSS) in the runoff would be lower than the existing TSS background concentration in the creeks. This is true at all stormwater facilities, except at stormwater treatment wetlands where treatment efficiency would depend on wetland design and wetland maintenance.

Please refer to Section 3-17, Secondary and Cumulative Impacts, regarding cumulative impacts of other projects in the area, including SASA and Sea-Tac airport projects.

P5-13 **Neglects to mention it reduces available drinking water forever**
DREIS section 3.5 on Groundwater is totally inadequate. The project permanently reduces the recharge to the aquifer and virtually guarantees the eventual contamination of the aquifer. This reduction in drinking water is even more painful when you realize the third runway also permanently reduces the recharge and increases contamination risks. There is already DOE documented jet fuel contamination in the aquifer so don't respond to this comment with the Port's song and dance that the aquifer layers aren't connected.

P5-14 What will we drink sixty years from now when the City of Seattle refuses to renew the current water agreement making the Highline aquifer a sole source aquifer instead of just supplying a portion of our water? A water shortage is being forecast even for rainy Seattle and it is expected to become our most precious resource in this century. A program should be set up by the state to pay the Highline Water District, the current going rate of water, in perpetuity, for the loss of the water from the combined projects regardless of whether it's from reduced recharge or contamination or both. To ask us to give up our water for both a 3rd runway and a highway extension when we have already given up water for the existing airport and highway is just too much, particularly when a portions of the project virtually guarantees contamination.

This proposal is somewhat similar to Seattle Water Dept's request during the airport's SEIS Master Plan Update process. However, when Borrow site 5 by the wellhead was eliminated as a fill source, they backed off on their request to indemnify the water.

Clean Air Act Analysis Assumptions Based on Ancient Inaccurate Analysis

P5-15 A complete air conformity analysis is needed to assess the pollution situation and identify mitigation measures.
A short description below indicates why the analysis needs to start from scratch rather than building on obsolete ones from the last century.

Start - Airport Master Plan Update Supplementary EIS 1997 –
Sea-Tac airport is "**surface transportation limited**",

Response P5-13

The discussion of groundwater impacts in Section 3.5 has been expanded). The recharge area for groundwater within the area of the roadway would not be reduced, as the majority of stormwater generated over the new impervious surfaces would be infiltrated into the ground. Please see responses to Comments A3-5 and A5-2 for a more detailed discussion.

Response P5-14

Thank you for your comment. Please see responses to Comments P5-12 and P5-13 above.

Response P5-15

An air quality conformity analysis for the SR 509: Corridor Completion/I-5/South Access Road project is included in Appendix H of this EIS.

**P5-15
(cont.)**

Clean Air Act calculations therefore ASSUME NO additional aircraft with third runway or from other improvements. In other words, airport couldn't really grow - it was the assumption that helped them avoid triggering the Clean Air Act de minimus limit that would have required a formal air conformity analysis.

Add - new road to airport and SR 509 extension - all part of the current proposal so airport no longer surface transportation limited

Consequences (planned and unplanned depending on who you are)

- Additional 200,000 aircraft plus the additional surface transportation and ground equipment that goes with it
- Mixing of airport chemicals with the highway chemicals (highway to go through airport safety zone - (great place to shoot aircraft down by the way) making more hazardous combination of chemicals and turning things into ozone faster
- Abnormally high health risk for highway construction workers
- Abnormally high health risk for highway commuters if highway gridlocks like I-5

Net result

P5-16

- The pollution they save with SR 509 is less than the NEW POLLUTION they get by actually being able to really increase Sea-Tac growth - OZONE Exceedences you can bet on from aircraft NOx that mixes with other chemicals and changes into ozone. SR 509 Project ADDS NOx and Ozone by increasing airport ground and surface traffic!!!! The increased airport activity will create more than 300 tons of additional NOx per year.
- Impaired health of construction workers as a result of third runway construction pollution combined with airport activities
- Huge health risk for anyone sitting in traffic under the flight path

Response P5-16

Air quality impacts associated with the Sea-Tac Airport improvements are included in the airport master plan update and supporting environmental documentation. WSDOT and FHWA do not have authority over airport operations.

Near term Action

Perform cumulative air analysis. However, they really bizarre assumptions in the Sea-Tac Master Plan Update need to be corrected rather than incorporated into the analysis.

Although some at the EPA suspected at the time the assumptions were invalid, there has now been enough data has been collected since that time to prove they were bizarre.

Issues that need to be corrected include:

- Construction schedule, designed specifically to avoid triggering limit, is no longer valid
- Applied pollution offsets from public road improvements and parking lot only to the third runway alternative even though the improvements would occur with either alternative
- Used bogus taxi times for third runway
- Used bogus delay savings that even airlines such as United subsequently objected to in writing to FAA referencing their own analyses showing a maximum savings of less than 30 seconds per aircraft.
- Fleet mix assumptions
- Emission parameters
- Overestimated third runway operations and underestimated third runway operations
- Did not account for additional operations technology such as gate software that eliminates gate monopolies allows.

Solution

- **Kill 3rd runway so not as close to maximum airport chemicals.** Bonus - the record wall on soft soils won't take out the highway in a quake
- Perform full up Clean Air Act conformity analyses using cumulative impacts including maximum airport growth. Ways to mitigate the problems analysis will reveal include:

Response P5-17

Thank you for your comment.

- Place **permanent air monitoring station at airport** - limit operations as needed (so we won't get as bad as Europe when they have had to shut down entire airport for a day things got so bad)
- **Limit number of operations at airport to avoid ozone exceedences down wind of airport** (note the CO we save from the SR 509 is not our County's problem. It's NOx !!!!!)
- Post highway signs saying to keep windows closed when under the flight path near the runway ends when in heavy traffic (you can really smell unburned jet fuel when near the tunnel on the south end of the airport now but the traffic moves there so you aren't subject to it very long)
- **Conduct health risk analyses and make a larger buy-out zone since the combined pollution** of highway plus 3rd runway construction or 3rd runway operation creates a much higher risk - it is **more than the sum of the parts**. Note buy-out area is larger with third runway than without the third runway. But, even without the third runway, as long as they are on what should be airport property, I suspect the health analysis will indicate a larger buy-out area than planned. An expert one time referred to the airport area as a "toxic stew". His description really says it all.
- Make workers sign waivers recognizing the dangers so they can't sue. Set **minimum health standards for workers** - no high heart attack risks or major asthma problems or major cancer risks. Anyone being treated for cancer already should not be allowed to work under flight path for more than two days.

Please note the published DOE reports available on the web in recent years have some errors regarding ozone exceedences. Someone at DOE was nice enough to point this out to me. There are now some EPA databases on the web that I think are more accurate. However, I don't think they report the stations that do not operate 12 months a year that also had exceedences. Ozone is a real problem. The Port of Seattle likes to talk about CO since road improvements and parking lots have really cut that down around the airport. The Sea-Tac3rd runway analysis took credit for the public roads and new parking lot only

P5-17

in the 3rd runway scenario and so was able to avoid triggering the Clean Air Act diminimus limit that compares pollution levels (pretended 24 St would only exist if the third runway did).

Even dirty Texas is monitoring NOx at a major airport so my suggestions are not as "wishful thinking", as they may first seem. Europe wouldn't have closed airports on bad air days if airport pollution wasn't a real concern. We need to learn from Europe's mistakes and from California's solutions (stricter environmental laws than Federal because mountains trap pollutants). Boston is pursuing charging fees based on how much an aircraft pollutes like some places in Europe already do- a potential funding source for the air monitor?

Base Buy-out Area on Life Expectancy Reduction Calculations

Considering recent high level court decisions, it is no longer enough to just focus on the pollutants that are monitored by the Clean Air Act (NOx, ozone, CO, etc), government is being forced to recognize and mitigate activities that expose people to pollutants that are known to impair health (Reference Hogue, Cheryl, Clean Air Act Faces Off Against Disabilities Act, Chemical & Engineering News, 11 September 2000. Page 6). Literally hundreds of reports in recent years have been released linking health problems to airport and surface traffic pollution. Since this proposal goes through runway protection zones, it mixes **maximum** airport pollutants with highway pollutants creating one of the worst environments known to man. A much larger buy-out area is needed than is customary for highways, particularly if the third runway wetlands permit are granted. If we had a 53 square mile buffer zone like the new Denver airport this might not be an issue but we have a postage stamp for an airport.

Mitigation should include health monitoring and new play fields

The Washington Dept of Health studies done in conjunction with the Seattle-King County Health Dept already have identified a number of illnesses, some fatal, that are higher around the Sea-Tac. They tend to be those associated with pollutants. The three reports are at <http://www.metrokc.gov/health/phnr/eapd/reports/cancer/>. Since I was a Community Health representatives for this project, I have continued to read the new

Response P5-18

Since publication of the Revised DEIS, a regional conformity analysis was completed for the proposed project and is included in Appendix H of this EIS. The proposed project meets the requirements of 40 CFR Part 93 and WAC 173-420 and conforms to the Puget Sound Air Quality Maintenance Plans. Please see response to Comment P5-8. By law, WSDOT can only purchase properties where it is deemed there is a justifiable public need related to the project. The land where the roadway passes the runway protection zones is almost entirely publicly owned, and thus there are very few relocations in the vicinity of the runway protection zones or immediately adjacent to Sea-Tac Airport.

P5-18

literature on the subject as it becomes available. It would take months to just summarize all of them. It turns out respiratory illness (asthma, cardiopulmonary disease etc) may be an even bigger issue than cancer. It's a complex situation since King County is a sick county already so using it as a baseline is questionable.

Attachments C, D and E contain some additional information on this but its not even a drop in the bucket compared to what's available on the web (or even on my computer's hard drive for that matter). It's really scary stuff. You can hide behind the problems with small population statistics only for so long.

P5-19

A database needs to be set up to monitor the health of businesses and homes subjected to airport and highway pollution since this **plan greatly increases the pollution for both**. Highline School district should be required to monitor absences at the district level to identify trends to determine when airport operations need to be capped to compensate for the additional highway traffic. Lung capacity measurements should be added to the eye and ear exams. Asthma in children is a huge problem related to pollutants.

P5-20

The SR509 extension/South Road access plan will greatly increase both the ground and air pollution at play fields near SR509. To make matters even worse, the third runway record-breaking wall will help trap pollution rather than absorb it like the mini-forest did. New fields, further away from the SR509 extension are needed for fields such as the North Elementary school field and Moshier field.

P5-21

Need cumulative noise impacts from airport and increased highway traffic

Airport populations, whose health is already impaired by airport pollution and sleep deprived from airport noise, are disturbed more readily by other noises such as increased highway noise. More highway noise mitigation is needed for highways built in close proximity to airport flight paths. Airport noise models do NOT take into account the effect of reflective surfaces and therefore vastly underestimate noise disturbances from increased impervious surface. A cumulative analysis is needed that includes impacts from reflecting surfaces that replace sound absorbing shrubs and trees. Health studies have

Response P5-19

As documented in the EIS, no significant adverse air quality impacts are anticipated as a result of the proposed SR 509: Corridor Completion/I-5/South Access Road Project. As a result, the measures proposed in the letter would not be necessary.

Response P5-20

The proposed SR 509 project will be within the National Ambient Air Quality Standards for the Puget Sound region; these standards are protective of human health and welfare. Please refer to Section 3.1, *Air Quality*, of this FEIS. The only playfields adjacent to the proposed improvements are located along the I-5 corridor, and all have been determined to have only minor proximity impacts associated with the proposed improvements, for which mitigation will be provided.

Response P5-21

WSDOT has conducted a detailed study of noise impacts from the proposed SR 509 project. The analysis has taken airport noise into account at noise-sensitive areas within the project study limits. The Traffic Noise Model (TNM) used to determine noise impacts also takes various surface types into account in relation to traffic noise. The SR 509 project has identified highway traffic noise impacts and recommended noise barriers for abating highway noise where such measures are determined to be feasible and reasonable to construct.

shown too much noise can literally turn serious illnesses into terminal illnesses (the straw that broke the camels back).

Construct noise barrier for S 196th Manmade Noise Amplifier Canyon

Recent destruction of mini-forests and the replacement of them with giant warehouse complexes and fenced housing developments have created a manmade cavern that seems to amplify airplane noise as it travels west towards the sound along S196 St. Homes that never heard airplanes prior to the construction of the manmade canyon, are now subjected to noise in at least the 70 db Level. The proposed highway cuts across this street in such as way that it will add to the already unbearable noise. The manmade canyon directs pollutants to the west subjecting residents to additional air pollution. The mixing of hazardous airport pollutants with hazardous highway pollutants will make it one of the most hazardous places in King County to live.

P5-22

Eliminate or mitigate the 150 foot plus high Giant Noise reflector

If a 150 high hard surface wall with 20 feet of fill on top of it is placed along the west side of SR 509 near S160 St to hold back the enormous quantities of third runway fill, it will be a giant noise reflector. The highway currently is underutilized so noise is more an issue if the SR509 extension is built which will greatly increase traffic. The wall did not exist during the Sea-Tac Master Plan Update EIS time frame. At that time it was to be a sloped hill that would have not have been like a giant reflector. The newer wall on the north end of the airport noticeably increased noise when it was built and the record-breaking wall will be much worse.

P5-23

The great wall will reflect the additional highway noise into the communities to the west of the highway will be cost prohibitive to mitigate. Therefore, the third runway needs to be killed in order for the highway changes to proceed. The bare hill that has replaced the min-forest already reflects highway noise into the heart of Normandy Park, as well as Burien, where there was no noise before the 3rd runway construction started. A RDEIS section 3.17 assumption that environmental analyses would, or have been done, was incorrect.

Response P5-22

Your comment is noted. WSDOT has conducted a noise study to evaluate highway traffic noise for outdoor use areas for all sensitive receivers along the proposed SR 509 to determine noise impacts. Traffic noise mitigation, in the form of noise barriers, is considered for all impacted areas and recommended for areas where such measures are found to be feasible and reasonable per WSDOT's noise policy and procedures. The presence of warehouse complexes and other structures is a preexisting condition is taken into account as appropriate when conducting the traffic noise analysis.

Response P5-23

Existing structures, terrain features, and ground types within the proposed SR 509 project area have been taken into account in the evaluation of noise impacts from the proposed project. Areas near South 160th Street are outside the project area (see response to Comment L2-4 for an explanation of WSDOT policy).

The third runway proposal actually now has more than just the one record-breaking MSE wall so noise impacts from all the walls should be assessed.

Attached Public Hearing Comments address more issues

Attachment A contains comments on a variety of subjects including more information on topics preceding this section as well as, but not limited to:

New earthquake hazard information

First Ave road failure when 3 to 1 slope not used

Best Management Practices already shown to be insufficient for this location

Archeological information not included in SR509 EIS

Procedural and Administrative Comments

The soft soil maps need to be improved.

It's too hard to identify proximity of creeks.

The web based RDEIS was greatly appreciated especially since the libraries that supposedly had a hard copy either didn't (or if they did, they don't know it). The maps were easy to use on the web. The CD was also appreciated since it was easier to use than the online version for reading text.

Most people do not know about the South Access Road part of this proposal. Neither the newspaper meeting notices or the news coverage made it clear that there was a new road. If it weren't for the great map in the newsletter sent out this year, I would not have realized it.

Last year's Tyee public meeting was held at the busiest time of the year for public meetings related to the expansion of Sea-Tac Airport (Army Corps and Noise hearings

with submittal of public comment all within few weeks of each other). Likewise, this year it fell in the same time frame as a noise hearing and the two weeks of Pollution Control Board meetings. It feels as if the government agencies are ganging up on us and putting all the meetings within a one-month period so we have to pick and chose what meetings to attend. I suspect, just like last year, when we look back next year at the time period of your 2002 meetings and comment period, February thru March will correspond with the peak anti-runway meeting time frame for the entire year.

Closing

Unfortunately, due to time constraints I cannot address all issues or identify all my specific references in the text so I have enclosed a partial reference list. I made an effort to bold the most relevant. The references starting at 117 from the Journal of Geotechnical and Geoenvironmental Engineering are particularly relevant to the 3rd runway wall and its impact on SR509 in an earthquake.

Feel free to contact me if you want me to identify the source(s) of information that was provided verbally at the Feb 27 hearing or herein.

Attachment A: Incomplete copy submitted at Public Hearing

Feb 27, 2002 (does not include soft soil and earthquake fault maps etc)

To:

John White, P.E., Project Engineer,
WSDOT, 6431 Corson Ave S., MS 61, Seattle, WA, 98108
whitejh@wsdot.wa.gov

Subject: Comments Dept of Transportation Project: SR509 Corridor Completion/I-5/South Access Road Project (due March 25)

Pulled together quickly but at least will provide some references to support public comment on Feb 27. Hope to add to these comments with more professional comments for March 25.

Thank you,

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www.thirdrunway.homestead.com and also
www.nothirdrunway.homestead.com

Attached comments plus select pages from referenced web sites

Initial set of Comments for the Record

- P5-24** 1) 509 extension Incompatible with Sea-Tac third runway - Kill the third runway since the region needs ground traffic improvement more than it needs a deadly short part time runway (FEIS admits increases aircraft ground incursions)
- a) too close to unsafe MSE wall that is placing excessive load on area with soft soils. (see map with wall location at www.nothirdrunway.homestead.com/quake.html). MSE wall failure could result in slide as far as highway. Soft soil reaction to earthquake can cause movement of highway overpasses for up to an hour after quake causing structural failure such as occurred in California (this is not just hypothetical!!).
- P5-25** b) destroys more wetlands - third runway already destroying too many- too many flooding problems already. Normandy Park homes on hills with no water in sight are getting flooded from underground stream movement.
- c) reduces FOREVER the aquifer recharge and therefore available water, combined with the aquifer recharge loss from the third runway wetlands. We are losing too much water - terrorism threat less for underground water sources. 60 years from now when the contract with Seattle Water Dept runs out may be sole source drinking water aquifer. Could not find any concern from drinking water loss in your draft. Why?
- P5-26**
- P5-27** d) too much construction traffic already from third runway. Already reduces traffic speeds by more than 15 miles per hour when trucks present.
- P5-28** e) too close to third runway safety area – toxic chemical hazard and falling airplane part hazards (Ask the children traumatized forever from airplane part falling in Mount Rainier school yard if you don't believe this is a problem)
- P5-29** f) too noisy with increased highway noise plus increased runway noise - less trees to absorb noise. MSE wall will reflect noise into Burien and Normandy Park. Recent tree

Response P5-24

All structures for the SR 509 project would be designed to meet current earthquake standards.

Response P5-25

Avoidance and minimization measures have been implemented to reduce wetland impacts associated with the preferred alternative to the greatest practicable extent and has been coordinated with the Signatory Agency Committee through the NEPA/SEPA/Section 404 Merger Process. Avoidance and minimization measures included modification to the roadway alignment, retaining walls, and bridges. As result wetland impacts have been reduced from 8.5 to 0.32 acre, and the preferred alternative avoids all Class 1 wetlands and spans all Class 2 wetlands with bridges.

Response P5-26

Groundwater impacts are addressed in Section 3.5, *Water Quality*. The discussion of groundwater has been expanded in this EIS.

Response P5-27

Truck traffic in the project area would increase during construction of the proposed project.

Response P5-28

Please see response to Comment P5-1 above.

Response P5-29

Existing structures, terrain features, and ground types within the proposed SR 509 project study area have been taken into account in the evaluation of noise impacts from the proposed project. Areas near South 160th Street are outside the project study area (see response to comment L2-4 for explanation of WSDOT policy).

- cutting and construction have already changed the noise in the area. You can already hear Highway 509 in the heart of Normandy Park due to changes in noise absorption over last few years.
- P5-29 (cont.)**
- P5-30** | g) Watershed can't handle the additional construction sediment and other pollutants
- P5-31** | h) air can't handle the additional construction particulates and additional construction pollutants
- P5-32** | 2) **South access road unacceptable.**
a) too near wetlands and Des Moines . Aquifer may be within 2 feet of surface .
b) increases capacity of airport. Therefore triggers Clean Air Act diminimus limit (more than 100 tons of NOX) and a full up Clean Air Act conformity is REQUIRED. SEIS for third runway admitted Sea-Tac is " SURFACE TRANSPORTATION LIMITED ", (NOT runway space limited as Port propaganda machine portrays it). Additional 300 tons of NOx exceeds the 100 tons (80 tons?) NOX deminimus limit
c) NOx at airport contributes to Puget Sound ozone problems due to wind patterns and mountains. Need impact on ozone from additional airport related pollution the road will allow (ground traffic, air traffic, ground equipment).
- P5-33** | d) too near runway protection zone (runway closest to terminal)so hazard from chemical pollutants, falling debri and ability to protect from terrorists
- P5-34** | 3) **Comments applicable to all project**
a) 2 to 1 slopes unacceptable based on civil engineering best practices, FAA building advisory or regulation (and you are in the safety areas), 1998 King County Wetlands mitigation report, 1.2 million dollar repair of First Ave in Normandy Park (Miller Creek underneath didn't have the 3 to 1 slope), etc
- P5-35**

Response P5-30

The mitigation measures described in Section 3.5.5 would be implemented to minimize potential sedimentation and pollutants in streams during construction.

Response P5-31

Construction-related air pollutant emissions would be temporary and spatially limited to the vicinity of construction activities, and would be within the air quality standards prescribed for the Puget Sound region. The mitigation measures outlined in Section 3.1.5 of this FEIS would be implemented to reduce emissions and meet air quality standards.

Response P5-32

Please see response to Comment P5-5 above.

Response P5-33

The proposed SR 509: Corridor Completion/I-5/South Access Road Project is independent of the Seattle-Tacoma International Airport Third Runway Project. The additional access provided by the South Access Road to Sea-Tac Airport is included in the airport master plan update and supporting environmental documentation. WSDOT and FHWA do not have authority over airport operations. Please address comments and concerns about airport operations to the Port of Seattle.

Response P5-34

Please see responses to Comments P5-1 and P5-33 above.

Response P5-35

Slopes of 2:1 can be acceptable, based on civil engineering best practices and depending on soil, groundwater, and other local conditions. Reinforced earth slopes of 1:1 can be used under specific conditions. The proposed project will used slopes of 3:1 or flatter at most locations. Please see response to Comment P5-5 above.

P5-36

b) Proposed mitigation such as covered trucks or trucks that only put as much fill in them that is legal to avoid dripping onto roads is NOT enforced and useless. See current third runway trucks for proof. Cheaper for them to pay the fines and haul maximum. Limited durations also ignored.

P5-37

c) Port of Seattle went on record that BMPs inadequate for North Employee parking lot project (significant amount of fill) at north end of airport (pollution fines for sediments in salmon bearing streams from what was first believed to be a water main break that turned out to be a spring popping out of nowhere– also got water on highway). The complexity of building on this water shed that has springs literally popping put of nowhere is well beyond BMP's.

d) Boring records are inconsistent.

e) Port tests for soft soils used the wrong type of drill so not valid

f) We have fractured till which needs to be considered when calculating contaminate transport speeds

P5-38

g) Where will the fill come from? How will it get there? How contaminated will it be? Reminder huge clean fill shortage due to proposed third runway and other Master Plan projects.

P5-39

h) Benzene levels around airport already significantly exceed the goal under Clean Air act with regard to 1 in million cancer risk (Contact Seattle-King County Dept of Health that has used the special 2001 EPA monitoring results at airport to calculate cancer risk). Benzene in combination with other chemicals makes the other chemicals more toxic. Proposal adds more benzene to an already toxic stew. Need risk analysis to determine illness and reduced life expectancy. Using this analysis need to determine a buy-out zone which is much greater than currently

Response P5-36

WSDOT contractors are required to follow all state laws regarding transport of cut-and-fill material.

Response P5-37

Please see response to Comment P5-12 above regarding groundwater. Please refer to Section 3.5.5 for a discussion of construction water quality best management practices (BMPs) for the proposed project. WSDOT will conduct geotechnical borings to supplement borings previously conducted in the area in accordance with best civil engineering practices.

Response P5-38

Please see response to Comment P5-10 above.

Response P5-39

Benzene is one of the four air toxins of greatest concern in King County, according to the Puget Sound Clean Air Agency. At this time, EPA has not established a process to evaluate the air toxic risk from individual roadway transportation projects; therefore, it is not possible at this time to quantify the small effect that the proposed SR 509: Corridor Completion/I-5/South Access Road Project would have on air toxins in the area.

P5-40

anticipated. Also to set maximum allowed pollution from airport since I assume you do not want to limit amount of highway traffic.

i) Air analysis focused on CO. It is airport activity NOx converting to ozone that is the real issue for Puget Sound (map of pollution concerns at <http://www.ecy.wa.gov/pubs/0001003/fig-11.htm>).

<http://www.ecy.wa.gov/pubs/0001003/fig-09.htm> shows that trend in people being exposed to unhealthy ozone levels is not necessarily going down. There was a huge spike in 1998 due to weather (almost 5 million people exposed to air not meeting federal health standards.) [Full report at](#) <http://www.ecy.wa.gov/pubs/0001003/index.html>. EPA air trends web site gives specifics on exceedences.

P5-41

j) Earthquake analysis needs to consider the recent SHIPS work
See faults at <http://geohazards.cr.usgs.gov/pacnw/ships/brocher01/index.html>. Note the dashed line running north and south in parallel to the Highway 509!!!!
Width of Seattle fault at <http://geohazards.cr.usgs.gov/pacnw/actflts/szf2a.html>
Also note the velocity of the movement during the Feb 28,2001 earthquake at the airport was higher than anticipated and they are still trying to figure out why.

P5-42

k) Both roads too close to airport runways and stored fuel. Too difficult to secure airport from terrorist activities

P5-43

l) Giant sloth in Univ of WA museum found near airport not mentioned in your draft.
But what you did cover was fascinating. Appreciate the effort.

Response P5-40

Please see response to Comment P5-8 above.

Response P5-41

The discussion of seismic activity in the project area has been updated and includes information from USGS Seismic Hazards Investigations in Puget Sound (SHIPS). Please refer to Section 3.4.1 in this EIS. The map showing north-south trending of the Coast Range Boundary in the project area identifies it as a fault of uncertain location.

Response P5-42

The Port of Seattle is a cooperating agency on the project, and Port representatives are members of the project Steering and Executive Committees. Development and refinement of the project alternatives has been conducted in cooperation with FAA and the Port to ensure compliance with FAA regulations and to address airport security issues. SR 509 and the South Access Road will be limited-access facilities and will be fenced with controlled access points.

Response P5-43

The giant sloth remains found at the north end of the airport were outside the Area of Potential Effect delineated for the SR 509 historic and archaeological resources analysis; therefore, this topic was not addressed in this EIS.

P6

March 21, 2002

Washington State Department of Transportation
John White, P.E., Project Engineer
6431 Corson Avenue South
WSDOT MS 61
Seattle WA 98108

ATTENTION: Public Affairs VIA E-Mail

The following are my comments on the 509/South Access Revised Draft Environmental Impact Statement. I am supplementing my comments with two attachments which I believe are relevant. One is titled Army Corps...and the second is Air Quality Conformity. I will also be faxing my comments that I sent to WSDOT in 1996 on the first draft environmental impact statement on this project. These 1996 comments have a lot of information that I do not wish to duplicate here. Thank you for your time and consideration of the issues I have brought up here.

3.1 Air Quality

You know, I don't know how you can say this project conforms. How can it conform when it is sitting next to an airport project that didn't conform? I don't understand how PSRC failed to point that out to you since they were directly involved in the process and must know about the re-writing of the EIS EPA required because the airport project did not conform. And although, in the end, it appears the airport project conformity was approved, this was a temporary conditional approval that has several unfinished elements. Any addition of traffic impacts to the area, and as the revised draft 509 EIS indicates a 30% increase in emissions over the do-nothing, would put the de-minimis levels of tons per year criteria pollutants over the allowable limit.

This air quality section refers to the PSRC's conforming TIP, but it says nothing about the general conformity rule required for federal project support/funding and approval. The EPA *conditionally* approved the general conformity of the Sea-Tac Airport expansion program on specific criteria that have not all been met. EPA did this because the annual inventory of tons per year of air pollution generated by airport operations in the future was predicted to exceed the conformity rule for CO and O3. They did this also because there were predicted violations of the federal NAAQS for CO and NO2. An air quality study was to be performed, the final analysis of the particulate nephelometer monitoring has not been received. NO2 levels measured at Sea-Tac North constitute the highest regional reference monitored rates in two decades. And even though below the federal standard, this ozone precursor's inventory in the airport model is higher than all sources for Snohomish County and may be the regional source for numerous ozone violations at Enumclaw.

Response P6-1

As discussed in Section 3.1.4 of the EIS, the proposed SR 509: Corridor Completion/I-5/South Access Road Project has been analyzed in conjunction with other planned and programmed regional transportation projects as part of Destination 2030 (the Puget Sound Region Metropolitan Transportation Plan). The analysis demonstrates that transportation air quality emissions within the Puget Sound region would be within the region's emissions budget in 2020 and 2030. The regional emissions budget is established to ensure that the region remains in attainment for the National Ambient Air Quality Standards (NAAQS), which have been established to protect human health and welfare.

The EIS discusses localized increases in pollution levels near the locations most likely to be adversely affected by the proposed project. These results cannot be generalized to consider total pollutant emissions in the area because there are other locations where pollutant levels would decrease as a result of the project. In all locations, the modeling results show future pollutant concentrations to be within the NAAQS.

P6-1

Basically, it is simple math. 509/South Access will add to pollution levels of CO and NOx in the area already overburdened by these emissions and in maintenance. If you increase emissions by 30% or more, as the narrative of this section admits, there will be a problem in the airshed. At 93 tons per year of NOx increase (de-minimus) the airport has already used up available tons per year and there isn't any room for 509's 30% addition to emissions over time. There was no inventory for SASA's emissions so this is unknown but will also increase emissions in this same area as the two joining freeways. Now the law is really stretched.

The airport's conformity analysis is about to expire in June. As far as I know, within the agreement for conformity, the Port and FAA are required to write a new EIS and issue another draft conformity analysis for the North Unit Terminal project. Within this scope of work, they should include the airport hotel, additional parking required for SASA and the hotel and the maintenance and idling emissions to and from SASA. There never was an emission inventory published for SASA. The Port and FAA said at the time they were unable to generate data because a specific carrier had not been chosen. This is now not a valid reason and an emission inventory for the separate operations at this facility should be prepared and presented to the public. This new document can now include 509/South Access (the Port and FAA did not add in the emissions for 509 during their EIS process because an inventory had not yet been prepared by WSDOT/FHWA, but is now available. This new document could also include construction emissions.

I thought it would be helpful if I made a list of suggestions:

- 1) Require a cumulative document for the public to review which includes:
 - a) A map showing where SASA and 509 and South Access, the runway extension and RSA, and Wescott's projects will be located in relation to each other.
 - b) Require an emission inventory for SASA
 - c) Require FAA to add the third runway emission inventory to the hotel, SASA, 509/South Access and any other major project inventory in the area that is reasonably foreseeable now or in the future.
 - d) Require that tons per year of emission inventories are prepared for all years where construction vehicles will be operating and include those vehicles in the inventory along with additional cars, trucks, planes and busses for parking lots
 - e) Require that FAA input particulate data into their aircraft model so we have an honest analysis and that this time they not be allowed to adjust the jets to light aircraft to show reduced NOx in the future although aircraft numbers go up
 - f) Require that someone with some knowledge can quality control this effort, check the figures, look at the input and be willing to dispute the results

I understand that WSDOT believes all these projects have separate utility and therefore, can be analyzed in separate documents. The public does not see it that way. I don't see it that way. In my opinion, these all are closely enough related to be considered part of the overall development. Development is the key. If the airport were not being developed, the south access road would not be needed. SASA wouldn't be needed. The

Response P6-2

Parts b, c, and e of this comment pertain to operations of Sea-Tac Airport. WSDOT and FHWA do not have authority over airport operations. Please address comments and concerns about airport operations to the Port of Seattle.

Locations of airport protections areas have been added to Figures 2.3-6, 2.3-7, and 2.3-8.

The proposed SR 509 project will be within the National Ambient Air Quality Standards for the Puget Sound region; these standards are protective of human health and welfare. Please refer to Section 3.1, *Air Quality*, of this EIS.

Quality control checks are performed on all project data by qualified personnel.

Response P6-3

NEPA requires that to be considered separate actions, each action should have "independent utility." This means that each action should be usable and a reasonable expenditure even if no additional transportation improvements in the area are made. The SR 509/South Access Road project would be usable and a reasonable expenditure whether or not the airport improvements occur. Please refer to Chapter 1 for a discussion of current and projected airport-generated traffic demand.

P6-2

P6-3

**P6-3
(cont.)**

North Unit Terminal which will displace another entry into the airport would necessitate the South Access. And although I already argued with someone at WSDOT about this issue, to me, it is a matter of perception. I perceive these projects to all be related. The above listed projects are being built in the same air and watershed. They are all somewhat dependent upon one another. And they are all additive to an area previously predicted to violate the Clean Air Act. They must be added together for an overall picture of what the nearby public is being exposed to. The public has a right to know what they are being exposed to.

P6-4

P6-5

I cannot see any references to my comments that I made in 1996 on the original draft. Isn't WSDOT/FHWA required to respond to those comments? I know they were received on 1/25/96 because they were sent certified and I have a signature card in my file. For your reference I am enclosing a copy and I consider these to still be relevant. And although you have considered other projects in the area in your cumulative section, the impacts don't seem to be added together. I am also e-mailing a copy of my comments to the Army Corps on the wetland 404 application for the airport project. These explain the history of the conformity process. I am also e-mailing a separate paper on conformity and how the airport project sponsors, I believe, used false data input and assumptions to derive a net less than zero increase in emissions over time.

P6-6

I do not consider a list of other projects to be a cumulative impact analysis. A listing and totals of those project impacts when added together is a cumulative analysis. For example, the Port/FAA proposes to fill 18.75 acres of wetlands for the third runway project. In the same basins that are affected by the third runway, SASA proposes to fill 2 acres and maybe relocate 18 (no mention of relocating Tyee Pond but appears to be necessary). WSDOT proposes to fill .2 and affect ____? Total acreage to be filled _____, total acreage to be affected _____, total acreage to be temporarily affected by construction _____? Runway extension and RSA affects _____?

P6-7

Wescott will temporarily affect ____? Total tons per year inventory of NOx 93 tons for airport and construction plus SASA plus light rail, Wescott and WSDOT construction years 2003 _____, 2004 _____, 2005, 6, 7 to 2010 etc. Is it over de-minimus? Is it predicted to worsen an existing violation? Is it predicted to delay attainment? Are there more PM10 violations? Where? How can they be reduced? Who is responsible for reducing these emissions?

3.2 Noise

WSDOT 509

P6-8

“Current noise-sensitive areas within the Sea-Tac Airport Noise Remedy Program areas were not included in the counts because the homes within the areas covered by this program would either be relocated or acquired by the airport in the future.”

Absurd! Completely false and misleading statement. Nowhere in the Port's EIS is there a commitment to relocate or acquire additional homes in the flight path exposed to additional noise from the third runway. FAA arbitrarily determined that the noise from

Response P6-4

The localized analysis for the proposed SR 509: Corridor Completion/I-5/South Access Road Project includes a background concentration that includes the effects of other regional sources. Please see response to Comment P6-1.

Response P6-5

A summary of comments on the 1996 Corridor-Level Draft EIS for the SR 509 project and responses to those comments are included in Appendix A of this EIS.

Response P6-6

The cumulative effects analysis was done in accordance with Council of Environmental Quality guidelines. Please see response to Comment A3-18 from EPA. Tyee Pond will not be relocated as a result of the proposed project; a portion of the pond will spanned by a bridge. Wetland impacts associated with the SR 509 project, including direct, indirect, and temporary impacts, are described in Section 3.6, *Wetlands*.

Response P6-7

See response to Comment P6-4 above.

Response P6-8

The Port of Seattle, according to FAA noise mitigation policy, has committed to relocating all of the mobile homes in the Homestead Park neighborhood as part of its current noise mitigation plan (Sea-Tac Airport Part 150 Study Update, 1998). The airport mitigation plan is independent of the proposed SR 509 project and is based on current and future noise levels and the ability to mitigate certain types of residences from higher noise levels. Questions pertaining to the airport noise mitigation policy should be directed to the Port of Seattle.

the third runway would be less than 1.5 db over existing noise. FAA's own guidelines do not require them to redesignate for non-compatible use any residential areas unless noise increases above 1.5 db over existing. Noise levels in this area though already exceed EPA standards. FAA's 1990 noise map lists the areas from the south ends of the runways out past 216th south in the 70 and above LDN.

The draft EIS for the third runway project had one little sentence tucked inside 5,000 pages which said something to the effect; 'if the Port and FAA heard from people who desired to be bought out from the third runway flight path, they would consider allocating funding toward that end.' The final EIS said essentially that they didn't hear from anyone so no one would be bought out. (They heard from me but never acknowledged my comments on this subject). The Supplemental EIS said they would consider buy-outs during the upcoming FAR 150 process. The FAR 150 process is now over and as far as I know, does not include any funding or commitment to buy out people in the 3rd runway flightpath.

P6-8
(cont.)

There is no firm commitment from the airport to acquire homes that would be impacted by the third runway. There is no firm commitment from the airport to acquire any more homes in the future from what has already been acquired to date. The airport EIS did not admit to more noise than present noise with a new runway. WSDOT'S 509 project is going to add cumulative additional noise impacts to an area already suffering from an existing noise condition that exceeds federal health and safety standards for residential land uses. WSDOT has a duty and obligation to work with the other federal agencies engaged in projects in the area to develop a document which considers all impacts together and then work with that other agency to develop appropriate mitigation.

WSDOT has a duty to the public welfare to agree to acquire and/or relocate people living in areas where noise levels are expected to exceed those which are set to protect public health and welfare. Surely, freeway noise added to SASA and airport noise will far exceed federal and local standards when considered cumulatively.

Wetland Concerns

What I thought was an 18 acre pond in the SASA EIS looks like wetlands F and G totaling more than 36 acres in the WSDOT EIS. Am I mistaken about the SASA EIS or the Ponds as opposed to wetlands? Could WSDOT research this discrepancy and explain it in the final EIS? It also looks different on the Port map that I am sending with my old comments via fax.

P6-9

P6-10

I also do not know if you are aware that the area to the north of the airport was planned for warehouses and parking, but the Port of Seattle withdrew their proposal, I believe, because the wetland acreage to be filled (18 acres) was too large for a permit. I am not absolutely sure of the area they have just taken back from the North Sea-Tac Park but believe it may be wetland area also that may house the future north

Response P6-9

The Northwest Ponds are part of Wetland F, as shown in the SR 509: Corridor Completion/I-5 Improvements/South Access Road Revised DEIS. Open water and vegetated areas of Wetland F, including the Northwest Ponds, are regulated as wetlands by the U.S. Army Corps of Engineers and the Washington State Department of Ecology. Wetland G is associated with Des Moines Creek within the Tye Golf Course.

Response P6-10

Please see response to Comment A3-18 from EPA and Section 3.17.2, *Cumulative Impacts*, of this FEIS.

warehouse/parking development. These all need to be added together to WSDOT's plans for this same watershed whatever plans the Port might have, which I do not know.

I thought it would be helpful if I made a few suggestions of questions that I would like posed and situations analyzed:

- 1) Add all wetland impacts together which include all of the following:
 - a) 509/South Access
 - b) Wescott plans
 - c) SASA
 - d) Runway Extension
 - e) RSA extensions at the north and south ends of the airport
 - f) SASA parking
 - g) Airport hotel and parking
 - h) Dozens of warehouse and cargo facility projects planned or ongoing at both the north and south ends of the airport
 - i) 28th Avenue arterial project
 - j) Tyee pond relocation?
 - k) Third runway project
- 2) Past project impacts that have not yet been considered cumulative including RSA extension of the east runway which filled .2 acres of wetland, filling a Evergreen lake in 1973 and creating the current retention facilities as mitigation for that project.
- 3) Future projects which might or will fill or affect wetlands in either the Miller or Des Moines Creek basins that will have a cumulative effect

3.17 Secondary and Cumulative Impacts

In your cumulative impacts section, does the 47% impervious surface area in the Des Moines Creek Basin represent WSDOT's plans only or does it also include the SASA? Does the SASA include the parking lot that was in their original plans or has it been dropped in subsequent plans that the public doesn't yet know about. Keep in mind that SASA promised thousands of jobs and all these people have to park their cars somewhere.

I did not see a mention of the first runway extension in the list of cumulative impacts. This extension will also add to the impervious surface area of the basin. Was it added into the 47% figure above? Does any addition that you may have or will consider for the first runway extension include a 500 or more foot runway safety area (RSA). The 500 foot RSA is an FAA requirement as a prerequisite for grant funding and approval of a project. In 1992, during the SASA EIS process, the requirement was only a 250 foot area so I just want to make sure you are using the right figures. Eleven hundred total feet of extended runway impervious surface area as well as the slope that will also add to water retention and possibly flooding problems in Des Moines Creek and basin should be mentioned. You should also include a discussion of what percentage constitutes a total stream destruction and whether any federal or local laws forbid this kind of cumulative impacts on waters of these type(s).

Response P6-11

The value of 47 percent estimated future impervious surface area in Des Moines Creek Basin was obtained from page E-IV of the 1997 Des Moines Creek Basin Plan:

Urban development in the basin at build out is expected to increase the amount of impervious surface in the area that drains to the creek within the basin from the current 35% to over 40%. Most of this increase will result from development within the cities. The remainder will be split equally between three big projects currently proposed within the basin. These projects are the State Route 509 extension, the South Aviation Support Area, and the 3rd Runway Expansion.

Of this 47 percent future impervious surface area in Des Moines Creek Basin, the SR 509 project would contribute less than 4 percent.

Response P6-12

The effects of urbanization on streams depend on many variables and cannot be evaluated solely in terms of total impervious surface within the basin. Des Moines Creek Basin would have the greatest percentage of high-density land uses, as designated by applicable comprehensive land use maps; which suggests a higher cumulative impact for the Des Moines Creek Basin than for other basins.

The proposed SR 509 project is being integrated with proposed improvements identified in the Des Moines Creek Basin Plan. As a result, the proposed stormwater design for the project, together with the basin plan improvements, would result in reduced peak flows to a level that prevents flooding and stream bank erosion; increased dissolved oxygen levels; riparian vegetation restoration; low-flow augmentation and lower water temperatures; improved fish habitat; and removal of a fish passage barrier at Marine View Drive. Please see response to Comment A1-1 to the U.S. Department of the Interior.

P6-10
(cont.)

P6-11

P6-12

P6-13

SASA proposes a land bridge over 188th somewhere for planes to taxi to and from SASA. Is there now a need for some other kind of bridge or tunnel for the South Access Road? Does either land bridge require rechannelization of Des Moines Creek? Is either an exception to any new FAA guidelines on avoiding land bridges over roadways or tunnels under runways? How will either of these items interplay with the first runway extension and a possible conflict of runway/roadways at 208th? 216th?

P6-14

Any discussion of existing problems in Des Moines Creek that does not include a thorough research paper on the decades of destruction and poisoning of these waters the Port is responsible for is inappropriate. Please refer to two clean water act lawsuits filed by CASE against the Port for 100 plus violations of their NPDES permit/Clean Water Act.

P6-15

Where will WSDOT mitigate the water retention problems created by the new freeway extension? Everything to the west is downslope toward the Puget Sound. Doesn't this create a problem for retention ponds? Who will be responsible for the new flooding problems that may wash out parts of roads that have already been affected since the RSA was extended on the first runway at the south end? Parts of the city of Des Moines already routinely flood when there is a big rain storm. What kind of mitigation plan does WSDOT have in mind to reduce this problem once all the additional impervious surfaces are added to this watershed upstream and uphill from these flooding problems?

P6-16

You know, I really don't think it matters who says what anymore. Ten thousand rocket scientists could tell the airport that the third runway is a bad idea and they would build it anyway. And although 509 extension would make my life easier and more convenient, it will also help the airport continue to build out their expansion and do what they want. I don't want the airport to grow. It is already too big. Jet airports are not compatible with the residential land uses around them. And although the airport blames urban development too close to their fence, they are actually the perpetrator of the problem because they refuse to let other airports take the business and profit away, they refuse to buy out enough of the sensitive land uses (it would be too expensive anyway).

P6-17

They are making so many peoples lives unbearable and they don't care. I think it is criminal that people are living within blocks of an emission inventory of 10 thousand tons per year of criteria and toxic air pollution. These same people are also being exposed to 70 DNL noise levels every day, every night. They are sick from the fumes, they are tired from the noise and they are broke from fighting. Their homes are not salable so they are stuck. Where are those agencies who should champion their cause? Where is environmental protection when you mostly need it? Who is watching out for these helpless victims who are suffering? Think of the children living and going to school here. What will be their fate as they grow up? And although I believe the 509 extension is a good idea and I want it, it will worsen everything that is already bad because it will draw in tons of traffic that is not here now.

Response P6-13

The South Access Road would pass beneath the SASA in a tunnel and is in compliance with FAA guidelines. Construction of the South Access Road, including the tunnel beneath the SASA, would not require rechannelization of Des Moines Creek.

Information pertaining to SASA and other airport improvements are included in the airport master plan update and supporting environmental documentation. WSDOT and FHWA do not have authority over airport operations. Please address comments and concerns about airport improvements to the Port of Seattle.

Response P6-14

The water quality analysis in the EIS was conducted in compliance with NEPA and SEPA, and in accordance as FHWA and WSDOT guidelines.

Response P6-15

A value engineering study was conducted in May 2002 to address stormwater issues for the proposed SR 509 project. The SR 509 stormwater design strategy, together with implementation of the Des Moines Creek Basin Plan projects, would result in reduced peak flows in Des Moines Creek and a reduction in flooding incidents. Information pertaining to the value engineering study is contained in Chapter 1 of this EIS; an updated description of the proposed stormwater treatment is available in Section 3.5 and in the Biological Assessment.

Response P6-16

Thank you for your comment.

Sincerely,

Debi DesMarais-Wagner
16247 8th Ave SW
Burien, WA 98166

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

From: Leonard, Ellie
Sent: Monday, March 11, 2002 5:37 PM
To: Patterson, Kynan; White, John (NW); Williams, David T.
Subject: FW: Public Comments SR509

Washington State Department of Transportation March 11, 2002

John White, Project Engineer
Urban Corridors Office
6431 Corson Avenue South, MS 61
Seattle, Washington 98108

Subject: SR509 Corridor Completion/I-5/South Access Road Project

Dear Mr. White,

Please accept the following as my public comments, concerns and questions on issues related to the SR509 extension:

Born and raised in the area, I am a naturally a volunteer stream steward for Miller, Walker and Des Moines Creeks and do video/still photography of the streams, habitat, fish, storm events and basically document as many impacts and influences as time and money will permit me to do.

It has become painfully obvious that our salmonids, primarily coho, chum, steelhead, and cutthroat trout are suffering from chemicals and stormwater runoff. For a visual understanding, I have video available of salmon during spawning season gasping for oxygen, trying to clear their gills as if something sticky was covering their tissues. They get disoriented often trying to leap out of the water beaching themselves. One coho was filmed nearly standing upright near the mouth of Des Moines Creek in the most recent spawning season. At the beginning of the season, most die pre-spawned. A Department of Fish and Wildlife officer uttered the "chemicals" word on seeing the video in 1999.

Chemical tests have been done on these salmon gill tissues to see what killed them. One test showed 26mg/l of copper. The maximum allowed under average hardness conditions (50) is 30mg/l. Obviously the maximum allowable is too much as the fish are dead. Copper primarily comes from brake linings of automobiles and airplanes.

Regardless of what the Port says about treating their industrial waste water, they do NOT remove metals in any significant amount. Freeway and street runoff add to the already heavy loads (MDL's) already present from the airport.

The second issue is stormwater runoff. Sea-Tac Airport and the City of SeaTac contribute such already unacceptable quantities of uncontrolled stormwater that frequent debilitating scourings take place in Des Moines Creek. The stream bugs that feed the fish need habitat too. Recent bug tests (Sept. 2000) by Salmon Web show the IBI (Invertebrate Biotic Index) as low as 10-12 (possible 40 scale) for Des Moines Creek. On a regular basis, Des Moines Creek is severely flooded with "bi-annual" 100 year storms. How can this be? Storms normally erode a little bit of the banks depositing new spawning gravel into the bed. However, these 1-2 year storms are so powerful they wash most of the gravel out to Puget Sound leaving only boulders and large rocks too big for salmon to dig redds (nests) into. This loss of habitat guarantees an exceptionally poor spawning thus ultimately causing a domino effect throughout Puget Sound. (video available depicting salmon attempting to dig a redd for 3.5 hours without moving a single rock!)

The most recent 2 year storm (November/December) flooded the Senior Center and gutted parts of Des Moines Beach exposing thousands of goeey ducks. (photos available) Severe runoff like a fire hose washed the beach away at the low-low minus tides. These mature clams were the State's Natural Resource and property destroyed, and now lost.

When the building "specs" call for a mere two year storm water detention level, in essence, what is being said is that it is OK to wash away all the restoration efforts every two years.

Just 6 months ago, members of Friends of Des Moines Creek and myself planted several native species such as ferns, salmon berry and indian plum along and near the stream banks to provide erosion control and shade. Now, they are all washed away.

This is very disheartening to say the least and really unacceptable.

The Port is building a 42" overflow pipe in their industrial waste water Lagoon 3, "just in case". 42 inch"??? That is huge and obviously states that the facility is being severely under built to save money and, read in, built to "minimums".

A contractor pointed out that these rain levels basically happen all the time as the two year designation implies and that DOT can insist on better detention.

The Department of Transportation has an opportunity with King County to take the lead here and throughout the region to establish new standards that actually work.

P7-1

Question: What treatments will the Department call for on metals, copper primarily, lead and zinc? Clearly, the Port's bio-swales are not effective at treating metals. They simply accumulate during the dry season. When the rainy season begins, most of the metals are wash/flushed down the streams killing hundreds of 20"-30" salmon every year.

P7-2

Storm water and its content is without a doubt, the biggest killer of salmon and streams throughout the region. Will the Department planners see the wisdom of raising the bar from the current two year level to a much higher level such as 25 year storms? It isn't just freeway runoff that is a problem, it is an accumulation of parking lot, runway, freeway, roof and other impermeable surfaces. Des Moines Creek is clearly "broken" and hurting. Hopefully the Department will not run over its body.

What will the Department do to solve these problems?

Brett Fish
801 S.W. 168th
Normandy Park, WA 98166
206.878.0807/206.242.5785

"Man did not weave the web of life, he is merely a strand in it. Whatever he does to the web he does to himself." Chief Sealth, 1854
<<http://www.geocities.com/bzdiving/GreatWallofSeaTac.html>> "Great Wall of SeaTac" Miller Creek <<http://www.geocities.com/bzdiving/index.html>>
History

Response P7-1

Des Moines Creek is not identified on Ecology's 303(d) list for metals contamination. Stormwater treatment for the proposed project includes enhanced treatment to capture metals. Please see response to Comment A3-5 from EPA.

Response P7-2

WSDOT water quality treatment facilities would be designed in accordance with the standards recommended in the Des Moines Creek Basin Plan, which were developed for the protection of Des Moines Creek. The facilities would be designed to capture and treat a typical water quality treatment storm, which is defined as a 24-hour storm with a 6-month return frequency. The lower return frequency storm is usually used for water quality design because the concentration of pollutants is much lower in a storm with a greater return frequency (i.e., a 25-year storm). Bigger storms carry significantly more water; therefore, pollutants in that stormwater are usually diluted.

P8

Response P8-1

Thank you for your comment.

Mr. John White, P.E.

I work for Puget Sound Truck Lines, Inc. in Seattle at 3720 Airport Way South. We provide over 300 family wage jobs with the operation and administration of about 250 trucks in the greater Puget Sound area.

In our truckload business time is money. Anything we can do to improve the flow of traffic in this region will certainly improve our profitability.

The corridor that this project will improve is critical to our operation. We have a terminal in Tacoma and one in Seattle. Our trucks are moving up and down the I-5 corridor 24 hours per day. Most days we experience heavy congestion for about 15 hours per day.

Please accept our support for this worthy project and our compliments to all of you who have worked so hard to clear the way for approval of the SR 509 Corridor Completion/I-5 South Access Road Project.

Best regards,

Don Frey
Vice President
General Freight
Puget Sound Truck Lines, Inc.
206-654-7316
fred43@msn.com

P8-1

P9

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

From: Barbara McMichael
Sent: Saturday, March 23, 2002 12:11 PM
To: whitejh@wsdot.wa.gov
Subject: 509 extension

March 23, 2002

Mr. John White, P.E.
Project Engineer, Urban Corridors Office
WSDOT
6431 Corson Avenue South, MS 61
Seattle, WA 98108

Dear Mr. White:

I live in Des Moines. I've attended a number of meetings regarding the 509 extension over the years, and I have to tell you that I've changed my mind over its necessity.

I think Boeing has already made up its mind about its involvement in (or abandonment of) the Puget Sound region, so I don't think we should kowtow to them.

More important, I think, is our responsibility to the people who live here. I acknowledge that traffic is terrible, but I am not convinced that allowing another freeway to slice through another south end neighborhood will do anything to improve our quality of life.

For one thing, it fits into the Port of Seattle's plans to expand SeaTac Airport -- and there are thousands of us who object strenuously to that.

For another thing, building another freeway encourages sprawl at the expense of already-established communities. It isn't fair, and frankly I'm tired of having the south end be subjected to yet another costly and disruptive project that will bring my family and my community (the folks who live here, not the ones who try to make a buck off of us) no discernible benefit.

Sincerely,

Barbara Lloyd McMichael
bkmonger@nwlink.com

Response P9-1

The SR 509 project is consistent with local and regional land use plans that have already addressed growth. A similar level of projected growth is expected to occur in the project area with or without the project. Although the proposed project would support and facilitate planned growth, it would not induce growth. In general, the SR 509 project would result in both travel-time savings (higher average speeds) and shorter trip lengths because of the more direct routing afforded by the new roadway. Please see response to Comment P1-7 from the Transportation Choices Coalition regarding the project benefit/cost analysis. Traffic benefits of the proposed project are described in Chapter 2 of this EIS.

P9-1

P10

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

From: Nuss, Steve
Sent: Monday, March 18, 2002 10:17 AM
To: John White (E-mail)
Subject: SR-509 RDEIS

To John White,
Project Engineer, WSDOT

Thank you for the opportunity to comment on the SR-509 RDEIS, SR-509 completion / I-5 improvement project. Since I am a resident of Kent and work in Tukwila, this project will have a direct impact on me. I am a bicycle commuter and also use my bicycle as transportation to run errands (utilitarian). While it is important to provide recreational facilities for cyclists, I am more concerned with utilitarian facilities. These facilities should provide cyclists the same access (to businesses, residences, schools, etc) that motor vehicles are provided. Please design these facilities to be safe, energy efficient and convenient for cyclists. For example,

P10-1

- * at road grade bike lanes (no elevated sidewalks for bikes)
- * in-bike-lane traffic light sensors, spaced from intersection for a bike (20 MPH downhill, 15 MPH level, 5 MPH uphill).
- * bike lanes delineated through right turn only motor vehicle lanes
- * smooth pavement (lack of drain grates, manhole covers)
- * etc.

P10-2

I would like to point out that there are only three places to pass under I-5 in Kent. Additionally, two of these three roads will be used to access park-and-ride locations. These facts make it very important to consider bicyclists in all of these locations. Please provide the necessary facilities to give bicyclists free access to either side of I-5.

P10-3

These same considerations should be given to all major surface streets that will be impacted by this project. I was quite alarmed to hear that the planned Marine View Drive bridge/wetland mitigation does not have bicycle lanes on it. It will be a mistake to build a bridge without bicycle lanes that will most likely be in use for the next forty years. This is especially irresponsible when you consider that Marine View Drive is the only North / South route accessing north Des Moines between Puget Sound and 24th Ave. So. which is far up the valley ridge (approximately 1-1/2 miles and a 340-foot elevation gain). A 14-foot wide lane does not provide the same protection that a designated bike lane provides. A lack of a bike lane will discourage some cyclists from using this facility. Some will still use this bridge but at lowered levels of safety. Still others will ride on the sidewalk, endangering themselves and pedestrians. I would like to see detailed preliminary drawings showing motor vehicle and bicycle channelization of the following areas when they are available for comment, before design freeze.

P10-4

- * SR-516 / Pac. Hwy. / I-5 / Military Rd.
- * So. 228th St. / Military Rd. / I-5
- * I-5 / So. 259th St.
- * I-5 / So. 272nd St.
- * Marine View Dr. / So. 216th St. / Des Moines Way

Thank you,

Response P10-1

Bicycle facilities for this project would be designed using the WSDOT Design Standards Chapter 1020 and *Guide for the Development of Bicycle Facilities* (1999) prepared by the American Association of State Highway and Transportation Officials (AASHTO). Design standards would vary within the project depending on the class of bike facility being designed.

Response P10-2

Bicycle lanes will be provided to allow safe access through the SR 516 interchange at either the SR 516 overcrossing or the South 228th Street overcrossing. Please see response to Comment P2-1 from Jacob Grob et al.

Response P10-3

WSDOT's commitment to contribute to the Marine View Drive replacement project is related to WSDOT's partnership in the Des Moines Creek Basin Plan. The contribution is for partial construction funds only, and is for mitigation credit for the removal of the impassable fish barrier.

The bridge project was designed by the City of Des Moines and is consistent with the City's comprehensive plan requirements regarding bicycle routes and corridors.

Response P10-4

Plans may be obtained when preliminary design of bicycle facilities is more complete. Improvements to the I-5/South 259th Street crossing and Marine View Drive are not included in the proposed project.

Steven M. Nuss
stevenuss@reddotcorp.com <<mailto:stevenuss@reddotcorp.com>>
26220 42nd Ave. So.
Kent, WA 98032
253-854-7561

P11

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

From: PAUL A SILVERNALE

Sent: Saturday, February 23, 2002 10:28 AM

To: John H. White

Subject: Comment On SR509

John White, P.E. Project Engineer WSDOT

I am concerned about maintaining the security along the west boundaries of our properties.

Our properties are west of Military Rd S between S 216th St and S 218th St.

As shown in option C2 the "right of way boundary" will be moved to the east a significant amount. Currently we are buffered by private property from pedestrians accessing 32nd PL S from S 216th St.

How will the WSDOT maintain the existing level of security for the properties along Military Rd S from S 216th St to 32nd PL. S adjacent this new boundary line?

Paul & Kristi Silvernale
21629 Military Rd S
SeaTac, WA 98198

Response P11-1

All highway right-of-way would be protected by a 6-foot chain-link fence. No connection would be made between 32nd Place South and South 216th Street

P11-1

P12

2/12/02

Dear WSDOT,

The I-5 - 509 project directly impacts our property and our investment @ 3014 So 259th Ct. The noise from I.5 has been a problem for many years. Back in 1993-1994 the DOT surveyed the problem. They agreed at that time that there was a noise problem. However, they felt that the number of residence impacted was not enough to fix the noise concern. Since the new project started there has been more noise and new problems. The freeway is moving 24ft closer to our home. This not only has compounded the problem but has made it less desirable to live at the property and will have a impact on the resale value of our property. We, in fact have over the last month tried to rent this home out. We had several complaints about the freeway being to noisy and because of this they were not interested. One of your engineers was interested in renting our home. This person said they lived over 38 miles from their office. That the house was nice and that the location was great. That the house was 5.1 miles from the office. They said that if it wasn't for the noise from the freeway and the project that they would have rented it. This directly comes from personnel in your office. Since the project started you have cleared vegetation from the fence that divides our property and the freeway. This has opened the view and has increased the noise from the freeway. Since then we have had transients jumping the fence into the yard. Your office says they have no plans to plant new vegetation. The freeway is going to be 24ft closer and the sign your putting up is about 10-15ft from the property line. This should have to work for all parties involved. Unfortunately, it is only working for WSDOT. This is only a short version of what we have to say. I would like this submitted into the comments and concerns. We need to know what else we need to do to be heard and addressed.

Thank You,



Tim & Teresa Still

3014 So 259th Ct
Kent, WA 98032

Mailing Address
24803 42nd Ave SO
Kent, WA 98032

Response P12-1

WSDOT has conducted additional noise evaluation of the project area. Noise mitigation has been recommended for locations with noise impacts where mitigation is both reasonable and feasible. A noise barrier has preliminarily been recommended to reduce noise from I-5 within the area of concern (including 3014 South 259th Court). If the proposed mitigation remains feasible to build a barrier based on final design information, this barrier will be constructed between this area and the highway.

The project referred to in the comment is the I-5: Pierce County Line to Tukwila, HOV - Stage 3 project, not the proposed SR 509 project.

Response P12-2

Upon completion of the project, WSDOT would plant vegetation (including trees) on all disturbed slopes. In many locations, this vegetation would include trees and shrubs, and would take several years to mature and visually screen the highway.

The project referred to in the comment is the I-5: Pierce County Line to Tukwila, HOV - Stage 3 project, not the proposed SR 509 project.

P12-1

P12-2

P13

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

From: Daniel Wend [mailto:dan@wendart.com]

Sent: Monday, March 25, 2002 5:04 PM

To: whitejh@wsdot.wa.gov

Subject: 509 extension

Dear Mr. White,

I strongly recommend that the Revised Draft EIS for the 509 extension be rejected. I believe the true goals of completing 509 are in fact politically driven and not based on sound transit needs or consideration of the true environmental impact of its further development. The impact statement as is does not consider the impact of 5000 trucks daily using the road for airport fill, nor the degradation of air quality, runoff and ground water contamination, or the expense of necessary noise mitigation. Please reject it. Thank you.

Sincerely,

Daniel Wend
22810 Thunderbird Drive
Des Moines, WA 98198
206.878.6912

P13-1

Response P13-1

Thank you for your comment. Impacts associated with construction of projects included in the Seattle-Tacoma International Airport Master Plan are not part of the SR 509: Corridor Completion/I-5 Improvements/South Access Road Project and are not evaluated in this FEIS. Air quality (Section 3.1), surface and groundwater (Section 3.5), and noise impacts and mitigation (Section 3.2) for the SR 509 project were evaluated in the Revised DEIS in accordance with NEPA and SEPA.

Since publication of the Revised DEIS, an air quality conformity analysis was conducted for the project and is contained in Appendix H of this FEIS; the project meets all regional air quality standards. A detailed noise analysis was conducted to further evaluate the potential noise barrier locations (Appendix I).

P14

5912 23rd Avenue South
Seattle, WA 98108-2944
206.723.0259
wye@earthlink.net
February 27, 2002

John White, PE
Project Manager, SR-509 extension
Urban Corridors Office
WSDOT
6431 Corson Avenue South
Seattle, WA 98108

Dear Mr. White:

Here are my comments regarding the REIS on the SR-509 corridor completion/I-5/South Access Road Project.

SOUTH ACCESS (AIRPORT LINK) PROJECT:

- P14-1 • Option H2A should be taken out from further consideration. It seems to have the same impacts (land takes) as Option H2B, but does not provide for a local access ramp as provided in Option H2B.
- P14-2 • Keep Option H0 for further study, like the stacked tunnel approach. Will it be cheaper than a traditional side by side roadway tunnel? (Option H2B)
- P14-3 • Has there been any thought of putting the local access on the south side of S. 188th St, instead of the north side. There seems to be more open space there, and fewer problems with merging/mixing of traffic from the airport drives. S. 200th St is too far away southward for local access.
- P14-4 • Eliminating the existing S. 182nd St airport entrance from International Blvd. with no local access nearby (like Option H2A) could play havoc with existing transit services (especially Metro Transit's Route 174). Does the Port of Seattle plan to speed up the process of building the new Intermodal Transfer Facility (with the extension of the existing north-south people mover system) on the existing Radisson Hotel property at S. 170 St and International Blvd to help alleviate this problem?
- P14-4 • Will the South Access roadway be 1 or 2 lanes in each direction? And will jersey barriers physically divide the opposing lanes or will it be simply a painted line with a wide in the median.

Response P14-1

Option H2-B has been selected for inclusion in the preferred alternative for the project. This design option includes a South 188th Street to northbound South Access Road ramp, but does not include a southbound South Access Road to South 188th Street ramp. Refer to Section 2.3.2 of this FEIS for a detailed description of the South Airport Link Design Options.

Response P14-2

Option H2-B has been selected for inclusion in the preferred alternative for the project. Ramps on the south side of South 188th Street were not considered because of airport security and operations concerns.

Response P14-3

Option H2-B has been selected for inclusion in the preferred alternative for the project. Transit could enter the airport drive system at South 170th Street and South 188th Street under Option H2-B. The Port of Seattle is working with local transit providers, including King County Metro and Sound Transit, to ensure adequate transit access to and from the airport.

Response P14-4

The South Access Road would have two general purpose lanes in each direction. The current study has not yet addressed the design details; however, traffic safety features would be considered for this project, including barriers.

	SR-509 EXTENSION: -----
P14-5	<ul style="list-style-type: none"> At. S. 200th St, for the northbound onramp and southbound offramp, around 18th Avenue South. Why did WSDOT not use the existing 18th Avenue South roadway for the entrance/exit to/from the north? It seems to be less costly, instead of building brand new ramps extending all the way down to S. 200th St (this is for the preferred alternative C2 - or is 18th Ave South in the FAA XOFA area??)
P14-6	<ul style="list-style-type: none"> In the REIS, (alternative C2) there is mention of a S. 200th St Southbound on-ramp and a northbound off ramp to SR-509, but does not show on any maps (chapter 2, 2-27). Is this ramp actually part of the south link access road instead on S. 200th?
	SR-509/SOUTH ACCESS INTERCHANGE: -----
P14-7	<ul style="list-style-type: none"> I assume that this interchange between SR-509 and the South Access interchange are totally grade separated. It seemed from your interactive map on the web, that for someone headed to/from the South Access Road from SR-509, had to go through the 24th/28th Avenue interchange first with a stop light. I assume that this is not true?
	SR-509/I-5 INTERCHANGE and I-5 itself: -----
P14-8	<ul style="list-style-type: none"> Though not in Sound Transit or King County Metro Transit plans, there needs to be space available in the median for a FUTURE in-line bus stop at the SR-516/S. 228th interchange, in the event that Sound Transit is foiled from building LINK light rail. Without this station, the HOV system falls apart, as buses serving the Kent Des Moines flyer stop would have to leave the HOV lanes to serve it.
P14-9	<ul style="list-style-type: none"> I like to know why WSDOT did not consider even building a direct HOV lane access ramp to the I-5 left hand HOV lanes from the NB I-5 to NB SR-509 CD lanes? (using the underpass with a combination tunnel. This means, HOV traffic would still have to do the 5 lane change, but just further north (past S. 200th) where northbound traffic begins to bog down further. I figured that this HOV ramp would be too expensive to install as a separate project, but since WSDOT is building the overpass at S.210th St for the SR-509 connection, it should not be as expensive to build.
P14-10	<ul style="list-style-type: none"> On the SB CD lanes, suggest that the second lane end before crossing over SR-516. This would allow traffic from the SR-516 entrance to SB I-5 to have the second lane free and no merging required. The second lane would still end in at S. 272nd St.
P14-11	<ul style="list-style-type: none"> It is not clear in the figures, but I assume that a vehicle from SB SR-509 could get off at SR-516??
P14-12	<ul style="list-style-type: none"> How will the S. 200th NB off ramp traffic be handled? I assume that the new NB CD lanes will handle that function.

Response P14-5

The ramps at South 200th Street were designed to match existing topography, facilitate traffic movement at the interchange, and avoid Hillgrove Cemetery. Eighteenth Avenue South is not at the proper vertical alignment to tie into the new SR509 freeway extension.

Response P14-6

Under Alternative C2, the South Access Road interchange would include a northbound SR 509 off-ramp to South 200th Street and a southbound SR 509 on-ramp from South 200th Street. The text in Chapter 2 has been revised to clarify this.

Response P14-7

Motorists on the South Access Road traveling to and from SR 509 would not have to stop at 28th/24th Avenue South. Both the South Access Road and SR 509 would be grade-separated from 28th/24th Avenue South.

Response P14-8

HOV direct access improvements or an in-line station at the SR 516 or South 228th interchange are not being considered because they are not part of the regional transportation plan.

Response P14-9

Direct access ramps at the I-5/South 200th Street interchange were not considered because they are not part of the regional transportation plan. Direct access improvements are not currently under consideration at SR 516.

Response P14-10

Two southbound collector/distributor (C/D) lanes would be necessary at the SR 516 interchange because one lane would not be able to accommodate all of the traffic forecasted for that roadway segment. The project traffic model predicts that 3,000 vehicles would use these two lanes. If only one lane was provided, significant congestion would occur.

Response P14-11

Yes, southbound SR 509 traffic could exit at SR 516 and would not have to merge with I-5 traffic.

Response P14-12

The northbound C/D lanes would become part of mainline I-5 traffic before the South 200th exit. To exit I-5 at South 200th Street, northbound traffic would continue to use the existing exit lane, or would be able to use a new added outside drop lane.

SR-509 (Out of study area):

P14-13

Though this is out of the study area, has there been any determination on how much traffic will actually divert from I-5/SR-599 to SR-509 instead? I'm curious on the impacts on the existing SR-509 freeway, especially southbound, due to the long uphill, after the Olson Way interchange that with additional trucks and buses (both slow moving), that could impede freeway traffic (even with the existing third lane today). This third lane actually needs to be extended a little further to become the S. 128th St exit only lane. (I drive a metro bus southbound on SR-509, and I'm not even to speeds when that third lane ends past Glendale Way S. This extension would give slow moving vehicle a little more accelerating space before moving back to the two lanes at decent freeway speeds.

P14-14

28th/24th AVE South:

P14-15

If Des Moines wants this road to be a parallel road to SR-99, it needs to improve the road further south (beyond S. 208th) and pedestrian friendly (with full sidewalks). It is pretty much a neighborhood street south of S. 216th St. I feel that with the new 24th/28th overpass, this is what is going to happen to this street - a bypass to SR-99.

These are all the comments I can think up at this time. Thanks for your time



Warren Yee

Response P14-13

The transportation study area for this project did not extend as far north as the I-5/SR 599 interchange, so this specific interchange was not evaluated. The traffic study did examine the level of service (LOS) on I-5 north of the SR 518 interchange. With the proposed project, LOS on I-5 in this area would improve from LOS E to LOS D. So, it is likely that some of the traffic that currently uses the I-5/SR 599 interchange would use SR 509 instead.

Response P14-14

The Washington State Highway System Plan: 2003-2022 prepared by WSDOT identifies improvements to SR 509 between Des Moines-Memorial Drive South and the 1st Avenue South Bridge. Specifically, this highway segment would provide two general purpose lanes and one HOV lane in each direction.

Response P14-15

Your comment has been forwarded to the City of Des Moines. Currently, the only planned improvements related to the 24th/28th Ave corridor are within the City of SeaTac.

SR509 Corridor Completion / I-5 / South Access Road Project

COMMENT FORM

The Steering Committee wants your comments on the adequacy and completeness of the Revised Draft EIS. Please return this tonight or send your comments by **March 25, 2002** by mail, fax or email:

- John White, P.E., Project Engineer, Urban Corridors Office, WSDOT, 6431 Corson Avenue South, MS 61, Seattle WA, 98108
- Fax: (206) 768-5899
- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

PRELIMINARY PREFERRED ALTERNATIVE
IS GOOD. I WOULD LIKE TO SEE AT LEAST
SOME THINKING TOWARD EXTENDING SR509
ALL THE WAY TO TACOMA. ALSO, I AM NOT
SURE I-5 CAN HANDLE ALL OF THE SR509
MERGE. PLEASE CONSIDER SR509 TO TACOMA

C1-1

ANOTHER ISSUE: ROUTING SIGNS FOR STATE
HIGHWAYS THRU CITIES IS VERY LACKING.
PLENTY OF SIGNS FROM SIDE STREETS BUT
DIFFICULT TO FOLLOW ROUTES. NEED SIGNS
INDICATING WHAT ROUTE YOU ARE ON.

C1-2

EXAMPLE FROM CURRENT 509 EXTENSION FROM
FREWAY TO 15TH AVE SD. & CONTINUING. THERE
ARE NO SIGNS FROM 15TH AVE AT EXTENSION TO
PACHINWAY RD BY SACAJHWA J.H.S.

Name HOWARD CLARK
 Address 1737-15TH AVE SO. #526
 City NORRIMBY PARK State WA Zip Code 98148
 Phone: 206-824-8780 E-mail _____

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509

Thanks for your comments.

Response C1-1

The Access Decision Point Report (CH2M HILL 2002) describes in detail the effect of the proposed project on I-5 traffic operations from SR 18 in Federal Way to I-405 in Tukwila. (This report, which was prepared for FHWA by WSDOT, must be approved by FHWA before construction of the new SR 509/I-5 interchange system can begin.) The report indicates that the preferred alternative (Alternative C2) would relieve congestion and improve traffic safety along I-5. With the proposed project, traffic congestion on I-5 would lessen during the morning and evening rush hours even though I-5 would be carrying more vehicles. In addition, the amount of time it takes to travel I-5 could decrease by 12 percent. Similarly, the speed at which traffic flows would increase. Please refer to Section 2.4.7 of this EIS for a discussion of the added access analysis.

Response C1-2

A signing plan will be developed as part of the preliminary and final design efforts for the proposed project. Your comment will be taken into account during development of the signing plan.

SR509 Corridor Completion / I-5 /South Access Road Project

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- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

We own property abutting I-5 (to the West) between S. 219th & S. 220th St up to & including vacated 31st Ave S. (Gem Addn Block 4)

Because we are currently in the midst of planning for construction of a 300-unit high-rise project (Pacific Ridge neighborhood) the extent of possible taking of our land is extremely important.

The ongoing expense of pursuing vesting & construction of our project leads us to wonder if the alternative of "early acquisition" of the entire parcel might make more economic sense...

Please contact us with plans, thoughts, etc. ASAP!

Name Greta Creswell / Leo Gaday
 Address 12035 Juanita Dr. NE
 City Kirkland State WA Zip Code 98034
 Phone: 425-823-8700 E-mail wow-realty@worldnet.att.net

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509

Thanks for your comments.

Response C2-1

WSDOT has developed a list of property owners who have requested an early buy-out. As funding becomes available, WSDOT would be purchasing as many of these properties as possible.

C2-1

C3

FEB 19 2002

SR509 Corridor Completion / I-5 / South Access Road Project

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- Fax: (206) 768-5899
- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

HELLO WSDOT, / JOHN WHITE: ENGINEER,
 OVERALL THIS PROJECT (ALT C2)
 LOOKS WORTHWHILE AND FEASIBLE.
 GOOD DESIGN!

C3-1

I DO HAVE A REQUEST — AT SOUTH
 194TH ST., APPROX. 10TH/11TH AVES., PLEASE
 PROVIDE OVER/UNDERPASS TO ALLOW TRAFFIC
 FLOW ON 194TH ST.

REASON: 8TH AVE SO. HAS BECOME VERY UTILIZED
 DUE TO SCHOOLS AT APPROX 200TH ST. AND COM-
 MERCIAL USES FROM 192ND ST. & NORTH.

C3-2

ALSO, IN THE SAME AREA (194TH ST/10TH-11TH AVE)
 A SLIGHT RE-ALIGNMENT, MOVING 509 TO THE WEST
 WOULD RETAIN A SMALL MANUFACTURING BUSINESS
 THAT EMPLOYS ABOUT 12 PEOPLE WITH LIVING WAGE
 JOBS.

Name Mr. J. Jollimore THANKS!
 Address 22806 13TH AVE S.
 City DES MOINES State WA Zip Code 98198
 Phone (206) 878-8510 E-mail _____

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509

Thanks for your comments.

Response C3-1

Improvements to South 194th Street are not included in the proposed SR 509 project. This comment will be forwarded to the appropriate agencies for consideration and implementation.

Response C3-2

The alignments of the proposed project alternatives have been designed to minimize the number of residential, business, and environmental displacements. SR 509 was not shifted further west in the vicinity of 194th Street and 10th/11th Avenues to avoid wetland impacts.

SR509 Corridor Completion / I-5 / South Access Road Project

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- Fax: (206) 768-5899
- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

C4-1

THIS PROJECT SHOULD PUT BICYCLE LANES ON ALL "SURFACE" STREETS IN THE MIDWAY INTERCHANGE AREA AND ON SR 516. SIDEWALKS AND 14-FOOT CURB LANES ARE NOT APPROPRIATE IN THE MIDWAY INTERCHANGE. ^{THE INTERCHANGE} THIS IS A PORTAL FOR CROSSING I-5, AND IT HAS BECOME HOSTILE TO NON-MOTORIZED TRANSPORT. MARKED IN-STREET BICYCLE LANES OR BICYCLE-COMPATIBLE SHOULDERS SHOULD BE A PART OF ~~THE~~ THE REWORK OF MIDWAY INTERCHANGE TO ENABLE BIKES TO SAFELY TRANSIT ACROSS I-5 IN THE EAST-WEST DIRECTION ALONG SR 516

C4-2

AND ALONG S 228th ST. 14-FOOT CURB LANES ARE NOT WIDE ENOUGH FOR BUSES AND TRUCKS TO SAFELY PASS. BUSES, 16-FOOT ^{ALONG SR 509} CURB LANES ARE BETTER. ALL AFFECTED SIDESTREETS SHOULD GET IN-STREET BICYCLE LANES AND SIDEWALKS, NOT JUST "MOTOR LANE / CURB / GUTTER / SIDEWALK."

C4-3

LEFT-SIDE ON AND OFF RAMP THAT ARE ADDED TO I-5 BY THIS PROJECT PERVERT THE STANDARD RIGHT-SIDE ACCESS CHARACTERISTICS OF INTERSTATE HIGHWAYS. ^{LEFT-SIDE ACCESS} THIS IS A WRONG-HEADED DESIGN.

HOW DOES A DRIVER GET FROM ^{SOUTHBOUND} SOUTH ACCESS ROAD SOUTHBOUND TO SR 509 NORTHBOUND? ~~THE~~ ^{HOW DOES A DRIVER GET FROM SOUTHBOUND SR 509 TO SOUTH ACCESS ROAD NORTHBOUND?}

Name DAVID W. HOFFMAN
Address 25334 45th AVE. S.
City KENT State WA Zip Code 98032
Phone: 253 852 4683 E-mail _____

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509

Thanks for your comments.

Response C4-1

Location of bicycle facilities on this project would be based on AASHTO standards. See responses to Comment P2-1 from Jacob Grob et al. and Comment P10-1 from Steve Nuss.

Response C4-2

The proposed SR 509 freeway extension will match into local arterials only at the points of limited access. At those locations, the improvements will match into the cross-sections existing or planned by the local agencies and will include, where appropriate, matching sidewalks and bike lanes. Your comment has been forwarded to the Cities of SeaTac and Des Moines.

Response C4-3

Most side streets are not a part of this project; bicycle facilities will be located based on AASHTO standards. The only on- and off-ramps on the left side of I-5 are HOV direct accesses; this configuration prevents weaving of HOV users. The location of on- and off-ramps at the I-5/SR 516 interchange has been designed to optimize traffic circulation, reduce safety risks, and is consistent with department standards.

A driver going southbound on the South Access Road can go northbound on SR 509 by exiting the South Access Road at South 200th, driving west approximately 2,000 feet, and then turning right onto the northbound SR 509 on-ramp. A driver on southbound SR 509 going to the northbound South Access Road would exit SR 509 at South 200th, drive east approximately 2,000 feet, and then turn left to enter the northbound South Access Road.

MAR 22 2002 ^{09:46}

SR509 Corridor Completion / I-5 / South Access Road Project

COMMENT FORM

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- Fax: (206) 768-5899
- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

We live at 21224 - 32nd Ave So, Sea-Tac, WA. 98198-4212, we have lived here for 45 years, moved in as newlyweds in 1957 when the house was brand new. In 1963 the state of WA. appropriated the East half of our property, as I-5 was being built, and they said they needed our property. As we were not on a sewer system at the time, we needed room for the drain field for our septic tank, so we were forced to buy the remaining property left from the house moved out next to us (on the South side of our property). It eventually worked out as we were able to build a 2 car garage with shop space, and have a garden area, plus plenty of parking space on this added property. Now, with the extension of SR 509 to I-5, according to your C 2 plan, we will lose all of our property. We are in our early to middle 70's and thought we would live here comfortably for many years yet. Now we are being forced to move by WA. state. I have talked on the phone with John White regarding this situation, and he assured me that (1) we would →

Name RICHARD P. & ANNE B. KURTZ
 Address 21224 - 32ND AVE. So
 City SEA-TAC State WA Zip Code 98198-4212
 Phone: (206) 878-8223 E-mail _____

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509

Thanks for your comments.

C5-1

receive fair market value for our home and property, and ② we would be offered another place comparable to what we have here. But - because of the proposed extension of SR 509 through this area, prices attained for homes that have been sold in this neighborhood have plummeted, and most have become rental properties, which sad to say, has further deteriorated the market. If this proposed extension of SR 509 were not coming through here, we were told we could easily get well over \$200,000.00 for our property. Will we be offered this much now? We spent a good share of last Summer looking at homes for sale, and anything under \$200,000.00 was usually unacceptable and in less than desirable neighborhoods. We would prefer to stay in this area, this is where our friends and family are, and our Church, and the shops, etc., that we are used to.

C5-2

This will be a very difficult move for us, mostly because of our age, but also because it is not our decision to make. If this is indeed inevitable, we would like to be considered for an early as possible buy-out. We are in pretty good health right now, but if this drags on for another 4 or 5 years, who knows what condition we will be in. We respectfully ask for your consideration regarding our situation as outlined above.

Response C5-1

Any acquisition appraisal for a public works project must ignore any effect the pending project has on market value. This means that if the sale price of your home dropped after the announcement of the project, our appraisers would look at other unaffected neighborhoods or at previous sales in the same neighborhood to determine the market value. In addition, the relocation program provides assistance to you in your search for a new home that would meet your needs. This program would search for comparable housing for your consideration, and would provide an allowance for replacement housing if no comparable houses are available within the value range of your home, a mortgage differential if your new mortgage is at a higher rate than your current mortgage, and the cost to move your belongings to your new home. Our brochure entitled Residential Relocation Assistance Program more fully explains the benefits that are available.

Response C5-2

We understand the stress that this acquisition places on your life and will do everything possible to help you through the process. We have developed a list of property owners who have requested an early buy-out. As funding becomes available, we would purchase as many of these properties as possible.

SR509 Corridor Completion / I-5 / South Access Road Project

COMMENT FORM

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- Fax: (206) 768-5899
- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

C6-1

My wife and I are in our 70's we cannot wait too much longer for the buyout. Our neighbors are in the same situation, we are two time losers. In 1963 we lost our backyard and lived with the noise fumes etc since then. I'll say no more I think you know how we feel about this project.

Name ANNE & RICHARD KURTZ
 Address 21224-32ND AVE S.
 City SCOTAC State WA Zip Code 98198
 Phone (206) 898-8223 E-mail

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509
Thanks for your comments.

Response C6-1

We understand the stress that this acquisition places on your life and will do everything possible to help you through the process. We have developed a list of property owners who have requested an early buyout. As funding becomes available, we would purchase as many of these properties as possible.

C7

SR509 Corridor Completion / I-5 / South Access Road Project

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- Fax: (206) 768-5899
- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

Dominick Macri 3137 So 211 St, SeaTac, WA 98198

(206) 824-0390 (C) (206) 793-9820

Willing seller, as soon as possible!!!
Been waiting many years, we are ready to get going. Think the project is much needed, think it improve area very much.

C7-1

Name Dominick Macri
 Address 3137 So 211 St
 City SeaTac State WA Zip Code 98198
 Phone: 206 824 0390 E-mail believe the voice @ att.net

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509
Thanks for your comments.

Response C7-1

A list has been developed of property owners who have requested an early buyout. As funding becomes available, we would purchase as many of these properties as possible.

SR509 Corridor Completion / I-5 /South Access Road Project

COMMENT FORM

The Steering Committee wants your comments on the adequacy and completeness of the Revised Draft EIS. Please return this tonight or send your comments by March 25, 2002 by mail, fax or email:

- John White, P.E., Project Engineer, Urban Corridors Office, WSDOT, 6431 Corson Avenue South, MS 61, Seattle WA, 98108
• Fax: (206) 768-5899
• Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

I AM A BUSINESS OWNER CONCERNED WITH THE \$10,000 - RELOCATION FUNDS. IT WOULD BE IMPOSSIBLE TO RELOCATE OUR BUSINESS FOR THIS AMOUNT - I ALSO OWN THE BUILDING AND AM CONCERNED ABOUT SOME OF THE HIDDEN COSTS WHICH OCCUR DURING CONSTRUCTION OF A BUILDING. I HOPE ALL OF THESE CONCERNS WILL BE ADDRESSED DURING APPRAISAL PROCESS. I BELIEVE THE STATE SHOULD CONSIDER RAISING THE \$10,000 - AMOUNT TO THE ACTUAL COSTS OF RELOCATION -

C8-1

GARY OHRT
PRESIDENT / PAC STAINLESS LTD

Name GARY OHRT / NORPATSY
Address 2407 SO 200TH
City SEATTLE State WA Zip Code 98198
Phone: 206 824 7780 E-mail GARY @ PAC STAINLESS . COM

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509
Thanks for your comments.

Response C8-1

The State only acquires the real property, not the business entity, so the appraisal would address the value of the real property only. Through relocation, businesses have several benefits available to them. The \$10,000 that you mentioned is for reestablishment expenses, including advertising costs for your new location, remodeling the replacement site, increased costs of operations, installation of onsite utilities, some licenses, and general costs associated with preparing the replacement site for business. WSDOT introduced legislation to increase this benefit last year, but it did not pass.

WSDOT also pays for actual costs to relocate and reconnect your inventory and personal property to your new location, costs to replace stationery and printed materials, limited site search costs, and some other related expenses. Some businesses choose to receive a payment, based on income, in lieu of having to document actual relocation costs. It is important for our relocation specialists to work closely with you to ascertain your needs in a new location, as well as assure a smooth transition to your new location.

The WSDOT brochure entitled Business/Farm/NPO Relocation Assistance Program more fully explains the benefits that are available.

C9

SR509 Corridor Completion / I-5 / South Access Road Project

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- Fax: (206) 768-5899
- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

C9-1

*I'm a serious recreational and commuter cyclist. As such
 I'm concerned that ^{this} road project provide access ^{for cyclists} across
 I-5 & SR 509. ALL the under passes & over passes
 need to have either a wide shoulder or a
 "at grade" Bike Lane for bike riders to use.
 these bike lanes should be provided in both*

C9-2

*directions (1 on each side of the roadway).
 Where right turn lanes are provided for cars
 a thru "Bike Lane" should exist on the left side
 of the right turn lane. Islands should have
 space between the curbs on the island &
 the fog lane that a bike rider can cycle
 thru.*

Name Melvin L. Roberts
 Address 9421 S. 241 street
 City Kent State WA Zip Code 98031
 Phone: 253-854-0952 E-mail melvin.l.Roberts@Boeing.com

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509
Thanks for your comments.

Response C9-1

Please see response to Comment P2-1 from Jacob Grob et al.

Response C9-2

Please see responses to Comment P2-1 from Jacob Grob et al. and Comment P10-1 from Steve Nuss.

C10

SR509 Corridor Completion / I-5 / South Access Road Project

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- Fax: (206) 768-5899
- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

C10-1

My concern is if the part of Seattle will be buying back mobile home in the parks, that are involved in the 509 project. These are about 100 mobile home in the park. In in the houses are about 20 years old and more. If they try to move them they'll fall apart. I hope that we can get at least some money so we can move to another location.

Name Jo Ann Tegt
 Address 20531 25th Lane So #79
 City Seattle State WA Zip Code 98198
 Phone 206-878-2897 E-mail _____

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509
Thanks for your comments.

Response C10-1

WSDOT is coordinating with the Port of Seattle to develop a program for relocation of the mobile home residents. The WSDOT brochures entitled *Transportation Property Needs and you, Residential Relocation Assistance Program*, and *Residential Relocation Assistance Program* fully explain the benefits available.

SR509 Corridor Completion / I-5 / South Access Road Project

COMMENT FORM

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- Fax: (206) 768-5899
- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

Juan Torres - area 824 0047 home / 206 914 3922 cell
 20421 25th Ln S, SeaTac 98188

I think this is a great project, traffic is
 a problem in the area.

I would like to be informed because
 I do live in a mobil-home and I feel
 like I will be affected. I would
 like to be up to date in detail about
 this project.

Thank you.

Name Juan Torres
 Address 20421 25th Ln S.
 City SeaTac State WA Zip Code 98188
 Phone: 206 824 0047 E-mail juetorres@hotmail.com
 206 914 3922 cell.

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509

Thanks for your comments.

Response C11-1

WSDOT is coordinating with the Port of Seattle to develop a program for relocation of the mobile home residents. Your name will be added to the mailing list.

C11-1

C12

FEB 19 2002

SR509 Corridor Completion / I-5 / South Access Road Project

COMMENT FORM

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- Fax: (206) 768-5899
- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

C12-1

We feel there should be considerations taken towards the Overall Noise and fumes from the following:

3rd runway if built, SO2 extension, Sea Tac's Industry East of 8th ave. SO. Business Zone's Industry from 8th and West of Des Moines Way S to Normandy Road.

Port of Seattle is building a new Bomb Blast Pad plus a ^{new} Hangar for parking and repairing jets.

This is a low area and fumes are bad now, when jets and trucks, ^{take off and land,} not to mention the noise.

This is asking a lot for a Residential and School area to have to put up with in one area!

C12-2

Please protect the wetlands and Des Moines Creek.

You were very busy at the meeting on the 12th and didn't get to talk to you in person. Wanted to thank you for sending a map before.

Name ROBERT and HORNA TOY

Address 18616 7th ave South

City Burien State Wash. Zip Code 98148-2024

Phone: 206-243-6397 E-mail _____

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509
Thanks for your comments.

Response C12-1

Please see responses to Comments P5-8 and P5-21 from Arlene Brown pertaining to air quality and noise.

Response C12-2

WSDOT has been working in cooperation with resource agencies and the Des Moines Creek Basin Planning Committee to protect streams and wetlands in the project area. Through avoidance and minimization measures, wetland impacts for the Preferred Alternative have been reduced to 0.3 acre, and WSDOT has committed to avoiding all Class 1 (high quality) wetlands and to span all Class 2 wetlands with bridges. Additionally, WSDOT has become a member of the Des Moines Creek Basin Planning Committee and would contribute funding for the Capital Improvement Projects identified in the basin plan.

Thank you for your comment

SR509 Corridor Completion / I-5 / South Access Road Project

COMMENT FORM

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- Fax: (206) 768-5899
- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

C14-1

I am impressed with project. I had some concerns regarding traffic impacts on I-5, but the drawings at the open house and a long conversation with John White alleviated my concerns. I think this project is way overdue. It will be a major asset to area.

I am a transit activist and am generally like WSEM regarding new/more roads. This project is definitely a winner!

Name Michael R Weidner
 Address 1915 Pike Place #12-111
 City Seattle State WA Zip Code 98101
 Phone: 206/737-3818 E-mail pstransit@yahoo.com

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509

Thanks for your comments.

APR 1 / 2002

COMMENT FORM

The Steering Committee wants your comments on the adequacy and completeness of the Revised Draft EIS. Please return this tonight or send your comments by March 25, 2002 by mail, fax or email:

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- Fax: (206) 768-5899
- Email: whitejh@wsdot.wa.gov.

Please include your name, address, and phone number in case we need clarification on your comment. We will respond to comments in the Final EIS.

Dear Mr. White:

My comments are a little late. I have lived at 21234-33rd so. for 38 yrs. Raised two children and lost my wife. I was in the process of rebuilding my house. When I received your first notice of the 509 freeway. At the meeting I was told my house would be bought by the state. I stopped work on my house at that time. Seems like a waste of money & time I purchased a motor home and some property and started thinking of moving. At the Feb 02 meeting the person showed us a map and told we were being moved. and referred us to real estate person. Last week I learned you were buying the house up to my house and blocking 33rd to the south. It's time to

Name FRED BUTLER
 Address 21234-33rd AVE SO
 City SEATAC State WA Zip Code 98198
 Phone: 206-8246267 E-mail _____

For more information, visit www.wsdot.wa.gov/regions/northwest/SouthKing/Projects/SR509

Thanks for your comments.

start telling the truth. Please tell me what you plan to do. So I can get on with my life I am 71 year's old!
 Thanks Fred Butler

Response C15-1

WSDOT has made every effort to inform residents who may be affected by the project. As the project design effort progressed, some shifts on the proposed alignments have occurred to accommodate design constraints or minimize impacts. Consequently, residents potentially affected have changed. We understand the stress that this places on residents who wish to make home improvements or move. WSDOT will continue to provide residents who may be affected with the most current information that will allow you to make the best personal decisions.

Our most current design indicates you would not be relocated. However, because your property is immediately adjacent to properties requiring acquisition, a small design change at your specific location could require acquisition of your property. This determination may not be available until additional design work has been completed. We will continue to keep you informed through public meetings or correspondence as the project design progresses.

1 WASHINGTON STATE DEPARTMENT OF TRANSPORTATION
2 OPEN HOUSE AND ENVIRONMENTAL HEARING
3 REVISED DEIS AND DRAFT SECTION 4(f) EVALUATION
4 SR 509 CORRIDOR COMPLETION/INTERSTATE 5/
5 SOUTH ACCESS ROAD PROJECT
6 TRANSCRIPT OF ONE-ON-ONE TESTIMONY
7
8
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12
13

14 February 12, 2002

15 4:00 p.m.

16 Highline Community College

17 South 240th & Pacific Highway South

18 Des Moines, Washington
19
20

21 COPY
22
23

24 Catherine A. Decker, C.C.R.

25 Court Reporter

Van Pelt, Corbett & Associates, 206-682-9339

I N D E X O F T E S T I M O N Y

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<u>Testimony of</u>	<u>Page</u>
Harold Crighton 3316 S. 225th Pl. SeaTac, WA 98198	3
Shawn DeOrnellis 22809 Military Rd. So. SeaTac, WA 98198	3
Howard F. Clark 17837 1st Ave. So. Normandy Park, WA 98148	5
Robert Pond 23116 30th Ave. So. Des Moines, WA 98198	6
Brad Corner 2621 2nd Ave. #1001 Seattle, WA 98121	8

HAROLD CRICHTON

Harold Crichton, C-r-i-c-h-t-o-n. What I would like for the committee to do is to consider on the HOV lanes to have them free to the public at certain hours. For instance, other cities have it where, say, the rush hours, that they have strictly for the car pool, and then after hours, that they would just let the public be able to use the HOV lanes.

And so, like, my thinking is, maybe from 6:00 to 9:00, that would be HOV occupancy only; and then from then let the public use it, and then from 3:00 or 2:30 to 6:30 or 7:00 go back to HOV lanes. That's something that I think we would be able to utilize our lanes more and the public would feel good about the lanes being used. We're not getting full use of our lanes. That's all.

SHAWN DEORNELLIS

Shawn DeOrnellis, D-e, capital O, r-n-e-l-l-i-s. I'm with the Puget Sound Church of God Holiness, pastor. And one of the concerns that I have, obviously, is ripping our church out of the community and having to

Van Pelt, Corbett & Associates, 206-682-9339

Response CRO1-1

Thank you for your comment. The Statewide HOV operation policy is established by recommendation of the State Transportation Commission. The SR 509 project will follow the HOV operation policies of the State of Washington. Currently, the policy is to limit HOV lanes to 2+ HOVs 24 hours a day.

CRO1-1

1 move.

2 Another concern -- my understanding is that there
3 is a mid-1960's law on the books that capped the
4 relocation expenses at \$10,000; and if that, in fact, is
5 accurate, I don't see how we're going to be able to
6 relocate the church. Our parsonage is also on the
7 property, so now we're not only going to be moving a
8 business, but we are going to be having to move a
9 residence. So that's one of the concerns I would really
10 like to have more information on. That may not be
11 accurate information, but if it is, I think our people
12 in the legislature need to give us more money on that
13 relocation. So that would be one of my concerns.

14 Obviously, the whole aspect of moving our church
15 out of the community, if it's got to be done, we
16 understand that. But the whole environmental impact of
17 that relocating, that whole situation -- I would like to
18 hear some more about that and how that's going to all
19 fall together.

20 We've got a lot of things in place here from the
21 standpoint that -- my understanding is there's one set
22 of rules that deal with residential relocation, another
23 set of rules that deal with business or commercial
24 relocation. In our case, we're going to have both
25 because you've got a residence and a business.

CRO2-1

CRO2-2

Response CRO2-1

The State only acquires the real property, not the business or nonprofit entity, so the appraisal would only address the real property. Through relocation, businesses and nonprofits have several benefits available to them. See response to Comment C8-1 from Gary Ohrt.

Response CRO2-2

The relocation program would assist you in your search for a replacement parsonage that would meet your needs. This program would search for comparable housing for your consideration and would provide an allowance for replacement housing if comparable housing is not available within the value range of your home, a mortgage differential if your new mortgage is at a higher rate than your current mortgage, and the cost to move your belongings to your new home. The cell tower lease would be considered in the appraisal of the property, but we would have to remove the tower from our right of way. It would be up to the tower owner and occupants to find a replacement site based on their business needs.

1 We also have a cell tower on our property that's
 2 leased to AT&T on a thirty-year lease. There's a
 3 significant amount of revenue that we'll be looking at
 4 possible loss; and so all of that we're going to be very
 5 concerned about when we finally get to talk to somebody
 6 about that whole package. But I would really be
 7 interested in finding out more about this relocation and
 8 what the money is there.

11 HOWARD F. CLARK

13 Howard F. Clark. I've been with this project as a
 14 spectator from the beginning. My first choice, way back
 15 when this first started, was to extend 509 to Tacoma. I
 16 still feel that's what we should do. Nothing wrong with
 17 the current plan we have. The preliminary preferred
 18 alternative is good.

19 The concerns I have about it are the traffic
 20 congestion it's going to put on I-5. It's going to move
 21 it from South Center Hill, probably, to the area that it
 22 merges -- to Federal Way and probably through Federal
 23 Way. The real -- and that's fine for the short term,
 24 and short term is a long term. But eventually we are
 25 going to have to have a highway to Tacoma other than 167

Response CRO3-1

Please see response to Comment C1-1 from Howard Clark.

CRO2-2
(cont.)

CRO3-1

CRO3-1

1 and I-5; they're just not going to be able to carry the
2 load. At least that's how I feel.

3 I have one more comment, if I can put it in, that's
4 unrelated, and that is the signing of the state
5 highways. Poor. I've driven in all 50 states, and as
6 an example, the current 509, from the time it comes off
7 the freeway and merges onto First Avenue South, there is
8 not one sign stating that that is Highway 509 until you
9 get to Sacajawea Junior High School off of Pacific
10 Highway.

CRO3-2

11 The side streets are full of signs telling you that
12 if you're on a side street and you get onto 509, you can
13 go right or left and it tells you that. But once you're
14 on the highway, there's no way to tell. You're passing
15 many, many intersections, major intersections, including
16 Midway, and there's not one sign telling you where 509
17 goes. And that's only an example. That's true -- many,
18 many of the state highway signs. That's it.

19
20
21 ROBERT POND

22
23 Robert Pond, P-o-n-d. My concern is that the sound
24 wall and well past my property -- I live on 231st -- and
25 that would be about where the access road comes up, in

Response CRO3-2

Thank you for your comment.

CRO4-1

1 other words, it's right at that junction. And my
2 property kind of angles in where the off-ramp would be.
3 And a lot of times they end the sound barrier too short.
4 I want to make sure that it goes as far as it possibly
5 can to make sure that that sound barrier gives me some
6 relief from the freeway that's coming a lot closer.

CRO4-2

7 And my second concern is that during this project,
8 which has been ongoing for quite some time now, they
9 seem to care far more for the commuters being upset or
10 bothered, whereas they are doing their construction all
11 night long with this huge equipment, which some nights
12 is unbearable. And I actually have a phone number of
13 the guy to call the next day when it goes beyond the
14 line -- when it gets to be too much.

15 I've called him before at eight o'clock in the
16 morning as he's got off shift, when they were pounding
17 and it sounded like a 747 going over your house, 24/7.
18 I realize that they want to have the least amount of
19 impact on the fewest number of citizens, but I think the
20 people up on 30th are already impacted from all
21 directions. I don't think they care about us much up
22 there, from the City of Des Moines, DOT, the police,
23 pretty much they just sell us short because that's the
24 Pacific Ridge development on the other side of that
25 line. And I'm not going to be victimized during this

Response CRO4-1

The current detailed noise study has evaluated noise barriers to identify their appropriate heights and lengths for effectively reducing noise levels. For areas where noise barriers are deemed reasonable to build, such barriers will be designed to meet a minimum level of noise reduction. Typically, where possible, noise barriers are designed to extend beyond an end receiver in order to provide the needed noise reduction. In the case of the noise barrier recommended for properties located at the northwest corner of the I-5/SR 516 interchange, the barrier would extend as far south as not to intrude on the roadway clear zone for safety purposes.

Response CRO4-2

For construction noise levels, WSDOT will follow all appropriate regulations for construction noise requirements. WSDOT will apply feasible and reasonable measures for reducing noise impacts on neighborhoods when possible, including proper placement of staging areas, time-of-day restrictions for specific construction activities, and appropriate shielding of noise sources as needed for night work.

Nighttime construction noise levels are regulated through State Administrative Code and through local ordinance (as applicable). WSDOT works to abide by all state and local rules for construction noise impacts. Nighttime noise variances will be obtained for construction period activities, if needed, and the conditions of the variances should be sensitive to nearby residential areas.

1 whole process.

4 BRAD CORNER

6 Brad Corner, C-o-r-n-e-r. My testimony is to say
7 that in general I support the project on behalf of my
8 partners that own property. The property is located at
9 approximately 23000 Military Road South. There are
10 three tax lots on the south side of Military Road. We
11 have approximately 700 feet of frontage on Military Road
12 South, with two rental houses. The approximate acreage
13 of those three tax lots is approximately six acres,
14 according to county records.

15 The south border of our property is commonly known
16 as Bolger Road and is part of the 509 project in terms
17 of its location. It would be southeast of where the
18 underpass, the extension of 228th, would be located. So
19 Bolger, then, would be the road coming up from the
20 valley floor, known as the full extension of 228th
21 Street.

22 My reason for mentioning those two properties,
23 along with our support, is that in the event the project
24 goes forward, we wanted to make sure that we were on
25 record that currently the property is available for sale

Response CRO5-1

Thank you for your comment. WSDOT has developed a list of property owners who have indicated they are willing sellers. As funding becomes available, WSDOT would be purchasing as many of these properties as possible.

CRO5-1

One-on-One Testimony

CRO5-1
(cont.)

1 for either dislocated businesses or dislocated portions
2 of the project itself where the public needs additional
3 land. And I am the contact person. My office address
4 is 10900 Northeast 8th Street, Suite 900, Bellevue,
5 Washington 98004; (425)462-0077 is the phone, and the
6 ownerships are under the names Kent Highway Commercial,
7 a Washington general partnership, and Military Road
8 Highway Commercial, a Washington general partnership.

9 Again, we support the efforts both of the City of
10 Kent and all the other jurisdictions, WSDOT, Sea Tac,
11 Des Moines, and the Port, in getting this project under
12 way.

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WASHINGTON STATE DEPARTMENT OF TRANSPORTATION
ENVIRONMENTAL HEARING
SR 509: CORRIDOR COMPLETION/I-5/SOUTH ACCESS

TRANSCRIPT OF PROCEEDINGS

FEBRUARY 27, 2002

4:00 p.m.

HIGHLINE COMMUNITY COLLEGE
SOUTH 240TH & PACIFIC HIGHWAY SOUTH
BUILDING 2
DES MOINES, WASHINGTON 98198

COPY

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Jacqueline L. Bellows, CCR
Court Reporter

Van Pelt, Corbett & Associates
101 Yesler Way 505 * Seattle, WA * 206-682-9339

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APPEARANCE

On Behalf of WSDOT: Osama Sabboubeh
Transportation Engineer
Northwest Region
6431 Corson Avenue South
Seattle, Washington 98108

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Statement by:	Page No --
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Cathea Stanley	5
Becky Stanley	7
Steve Nuss	10
Claire Everett	11

Van Pelt, Corbett & Associates
101 Yesler Way 505 * Seattle, WA * 206-682-9339

Response CRH1-1

Please see response to Comment P2-1 from Jacob Grob et al.

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STATEMENT OF DAVID W. HOFFMAN

DAVID W. HOFFMAN: My concern is with regard to the Midway interchange. I'm concerned that the Midway interchange is biased too much towards motor traffic. Although the interchange provides a way to cross I-5 to get between the east and west sides, it is still extremely intimidating for people who are practitioners of nonmotorized transportation. In particular, I mean, bicyclists and pedestrians.

And even more than pedestrians, I'm concerned about bicyclists. This plan appears to not have any provisions being made to allow bicyclists to transit between Military Road South and Pacific Highway. And I would like to see this project do a better job of addressing the transit of bicycles in the east and west direction along SR 516 through the Midway interchange area.

The Midway interchange is important because there are only three ways in the city of Kent to get back and forth across I-5. Midway is one of them. Reith Road is another

CRH1-1

Van Pelt, Corbett & Associates
101 Yesler Way 505 * Seattle, WA * 206-682-9339

1
2
3 **CRH1-1**
4 **(cont.)**

and South 272nd is the third one. And these portals are more than a mile apart. That's a lot of distance for somebody who is involved with nonmotorized transit.

5 I would not need to use a car nearly as
6 often if it was easier for me to use a bike,
7 which I do. I am an adult commuter bicyclist.
8 I use Pacific Highway South when I work at a
9 location near Boeing field. And I have, in the
10 past, have had to transit the Midway
11 interchange every morning and every evening
12 during rush-hour conditions. So also I've my
13 credentials that I've been a commuter bicyclist
14 year in, year out, all weather, day, night, for
15 the last 36 years. And I know bad conditions
16 when I see it.

17 The Midway interchange as it exists today
18 is bad. This plan without bike lanes on it
19 also is bad. That ends my statement.
20
21
22
23
24
25

Van Pelt, Corbett & Associates
101 Yesler Way 505 * Seattle, WA * 206-682-9339

STATEMENT OF CATHEA STANLEY

CATHEA STANLEY: So what do I do? Just say how I feel? Should I give my address? Right.

Now, my address is 20120 15th Avenue South, just off of 200th. And I just -- my comment is that we are already maxed out noisewise; and this freeway's going to go, like, three blocks below me on 18th and then come across the golf course. When they decide to take out the trees for the barrow pit for the airport, then our noise is going to be even worse.

I have my business in my home. I feel I'm already at my maximum for noise. And I'm at my wit's end what to do. I'm a single person trying fight the big system. I just want to make the comment that I don't see how our neighborhood can handle any more noise. We have 24-hour-a-day noise with the airport.

And we already have airport noise. We have airport pollution. Now we are going to have freeway noise and pollution added on to an almost unbearable situation.

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Response CRH2-1

Noise propagation from highway traffic is different from airport noise in several ways. First, aircraft fly overhead and as such, noise from them is not absorbed by ground features; whereas freeway noise travels along the ground and is therefore subject to added absorption from the ground. Second, airport noise consists of intermittent single noise events, whereas highway traffic noise is more constant, thus it is perceived differently.

WSDOT has analyzed highway traffic noise along the entire SR 509 project area and will recommend noise barriers where they are reasonable and feasible. For locations farther from the roadway, highway noise levels generally decrease at about 3 or 4.5 decibels per doubling of distance from the roadway. The property at 20120 15th Avenue South appears to be located three blocks from the proposed roadway. At such distances, highway traffic noise exposure is not expected to be substantial or problematic.

CRH2-1

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Thank you.

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Response CRH3-1

Figure 3.10-1 has been updated to show your neighborhood.

1 STATEMENT OF BECKY STANLEY

2

3 BECKY STANLEY: Okay. I want to talk

4 about what Cathea Stanley was talking about.

5 On the map of displacement by type alternative

6 and neighborhoods under the social section in

7 the EIS, table 3.9-2 -- the map is on page --

8 it doesn't say what page. The map figure

9 3.1-1. And my mother's neighborhood is south

10 of the 200th Street, east of the North Hill

11 neighborhood, north, central and north central

12 neighborhoods and west of the Homestead Park.

13 And the SR 509 is going to be within three

14 blocks of my mother's house.

15 **CRH3-1**

16 This neighborhood, it's not listed as a

17 neighborhood on this figure 3.10-1. And I

18 looked on the assessor's tax data and my

19 mother's address said that her district was

20 Seelye to, S-E-E-L-Y-E, to Des Moines,

21 according to the tax assessors.

22 I'm just concerned because this, because

23 this neighborhood is going to be impacted and

24 it's not even a neighborhood in the EIS study

25 area.

CATHEA STANLEY: What about the barrow

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1 pit?

2 BECKY STANLEY: That's right. Right
3 behind that neighborhood -- my mom lives at
4 15th, and her backyard is part of the noise
5 abatement property that the Port of Seattle
6 originally had to buy homes for.

7 CATHEA STANLEY: It's right next to it.

8 BECKY STANLEY: There's a word for that.
9 Okay. And back there is the barrow pit area
10 and logging zone. Currently it's a forested
11 area and the trees are helping to mitigate for
12 some of the noise that she's experienced in her
13 neighborhood. Those trees have been permitted
14 to cut; and for the third runway, they are
15 going to be digging several large barrow pits
16 back there within 50 feet of her backyard.

17 Again, this is a neighborhood not even on
18 your EIS report.

19 CATHEA STANLEY: So we want to know why,
20 please.

21 OSAMA SABBOUBEH: We'll answer these
22 comments.

23 CATHEA STANLEY: I'm a 61-year-old single
24 lady, and I have my own business in my home. I
25 need to be bought out with enough money that I

CRH3-2

Response CRH3-2

Any acquisition appraisal for a public works project must ignore any effect the pending project has on market value. See response to Comment C5-1 from Richard and Anne Kurtz for more information about relocation packages. WSDOT would also include the move of your business in the relocation package. Please work closely with our relocation specialist to assure that we fully understand the needs of your business and can assist you with your new location.

The WSDOT brochures entitled Business/Farm/NPO and Residential Relocation Assistance Program more fully explain the benefits that are available to you.

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CRH3-2
(cont.)

can be relocated to some place of equal size, a
house of equal size, because it's being
devaluated so bad by the airport and now the
509. So ...

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Response CRH4-1

Please see response to Comment P2-1 from Jacob Grob et al.

Response CRH4-2

Please see response to Comment P10-3 from Steve Nuss.

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STATEMENT OF STEVE NUSS

STEVE NUSS: I just want to make sure bicycle facilities are included in all of the surface-street improvements that are being considered for this project, especially the 228th and 516 interchange.

CRH4-1

There's three -- currently there's only three places to get through or under I-5 for a cyclist. 516 is very unfriendly to cyclists right now. We need to try to improve that access. That's it.

One other thing, I recommend bicycle facilities on Marine View Drive Bridge as well. That's a geographical choke point for all travelers right now. And to not put a bike lane on a bridge that will probably be there for the next 50 years is irresponsible.

CRH4-2

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STATEMENT OF CLAIRE EVERETT

CLAIRE EVERETT: Okay. My first quarrel is with Julia Patterson. I have always supported her. She's even come to my house. She has been totally against the -- they had the runway issue, and I believe in what she's been doing. But I think this -- I'm sorry. I think she has sold her soul to the Port of Seattle.

I live in Normandy Park. I live off of 192nd Street, near to First Avenue. Our home values have not gone up -- they've gone up but not as much as they would have because of the third runway issue.

And now, to benefit the Port of Seattle, the movement of huge semis on our freeways, to benefit the people who take I-5 and have trouble with the traffic on Southcenter, she is going along with this, this idea to build, you know, the 509 extension to I-5.

If you do that, it's going to create such a traffic mess because -- and I know from experience, because even though 509 is perfect now, the way it is, especially since they built

CRH5-1

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Response CRH5-1

The table below shows the traffic volumes projected for the 1st Avenue South Bridge and East Marginal Way (north of 1st Avenue South and south of Michigan Street) in 2020 under the No Action Alternative and Alternative C2 (the preferred alternative). Traffic volumes on the Alaskan Way Viaduct were not calculated, but the volumes on East Marginal Way north of 1st Avenue South provide an indication of what could be expected. The traffic volumes for both alternatives are similar. The very minor differences (no more than 2 percent) indicate that the level of service, a measure of traffic congestion, would not worsen as result of the proposed project.

Street Segment	2020 No Action		2020 Preferred Alternative	
	Northbound	Southbound	Northbound	Southbound
1st Avenue South Bridge	3,190	5,015	3,230	5,050
East Marginal Way (north of 1st Avenue South)	2,605	3,015	2,605	3,045
East Marginal Way (south of Michigan Street)	510	515	510	525

1 the First Avenue South bridge. I work in
2 downtown Seattle. When there is a traffic
3 problem on I-5 southbound, everyone moves over
4 to take 509. This is understandable. It not
5 only clogs 509, it clogs the viaduct. It clogs
6 East Marginal Way, the First Avenue bridge, 509
7 all way down into Des Moines. Everything is
8 clogged if we get extra traffic.

9 I can envision it happening, maybe not
10 that bad, but happening on a daily basis. It's
11 going to ruin the quality of life of the people
12 who live here. I have no problems with 509
13 being connected, I mean going down into Des
14 Moines to service those poor people who put up
15 with the traffic problems in the area. I do
16 have a problem with connecting to I-5 just for
17 the sake of business, big business.

18 I can envision if you don't take care of
19 East Marginal Way and the viaduct at the very
20 same time, you're going to have nothing but a
21 big headache. It's going to ruin our quality
22 of life. It's going to keep my home price from
23 going up. That's my retirement funds.

24 That's my statement. I'm against it.

25 Okay. Thank you very much.

**CRH5-1
(cont.)**

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C E R T I F I C A T E

1 STATE OF WASHINGTON)
 2) SS
 3 COUNTY OF King)

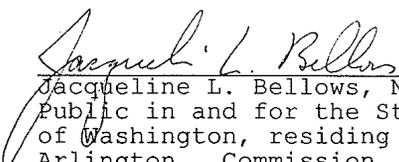
4 I, Jacqueline L. Bellows, a Notary Public in
 5 and for the State of Washington, do hereby certify:

6 That the foregoing hearing was taken before
 7 me at the time and place therein set forth;

8 That the statements of the witnesses and all
 9 remarks made at the time of the hearing were recorded
 10 stenographically by me, and thereafter transcribed
 11 under my direction;

12 That the foregoing transcript is a true
 13 record of the statements given by the witnesses and of
 14 all remarks made at the time of the hearing, to the
 15 best of my ability.

16 Witness my hand and seal this 12th day of
 17 March, 2002.

18
 19
 20 
 21 Jacqueline L. Bellows, Notary
 22 Public in and for the State
 23 of Washington, residing at
 24 Arlington. Commission
 25 expires October 17, 2002.

Van Pelt, Corbett & Associates
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I N D E X O F T E S T I M O N Y

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<u>Testimony of</u>	<u>Page</u>
Becky Stanley ----- 4108 48th Avenue South, Seattle	27
Mel Roberts ----- No address given	29
David Hoffman ----- 25334 45th Avenue South, Kent	31
Robert Back ----- 238480 16th Lane South, Des Moines	33
Rose Clark ----- Deputy mayor, City of Burien	35
Steven Richmond ----- 6502 18th Avenue Southwest	41
Arlene Brown ----- 239 Southwest 189th Place, Normandy Park 98166	46
Bob Pond ----- 23116 30th Avenue South	51
Gerald McGinnis ----- 419 Southwest 182nd, Normandy Park	54
Claire Everett ----- 163 Southwest 192nd Street, Normandy Park	55

A P P E A R A N C E S

1
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5
6 CRAIG STONE

7 WSDOT Project Director

8
9 GEOFF BAILLIE

10 Independent consultant, Baillie and Associates

11
12 JOHN H. WHITE

13 WSDOT Project Engineer

14
15 SUSAN EVERETT

16 WSDOT Project Manager
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Pages 4 through 26 of the Transcript of Proceedings intentionally omitted. These pages contain an introduction to the SR 509 project by Craig Stone of WSDOT.

BECKY STANLEY

1
2
3 Hi. My name is Becky Stanley. I live at 4108
4 48th Avenue South in Seattle. I'm here tonight to
5 speak about concerns I have for my mother's
6 neighborhood in the city of SeaTac. I looked at
7 this CD-ROM, and I noticed on figure 3.10-1, it's a
8 map called The General Location Project Area
9 Neighborhood Map, and it doesn't include my
10 mother's neighborhood.

11 Her neighborhood is -- does anybody want to
12 **CRH6-1** look at this while I -- her neighborhood is south
13 of 200th, east of the North Hill neighborhood, west
14 of the Homestead Park neighborhood, and north of
15 Central and North Central neighborhoods. Her
16 neighborhood is surrounded by the neighborhoods in
17 your report but not included in your report. And
18 the neighbors are wondering why.

19 This neighborhood borders the runway
20 protection zone on its side to the east, and that's
21 also part of a noise mitigation area owned by the
22 Port of Seattle. And this area is on the south
23 side of 200th, across the street from Tye Golf
24 Course.

25 The green space behind my mother's house is a

Response CRH6-1

Please see response to Comment CRH-3 from Becky Stanley

1 forest right now. The trees are helping with noise
 2 and pollution, although the noise is still pretty
 3 bad. However, the Port of Seattle has a permit to
 4 log it, and it's in the process of obtaining
 5 permits to construct borrow pits and obtain soil
 6 for the third runway, and then they are going to
 7 develop it. So the trees are not going to be there
 8 for very long, helping with the noise. They are
 9 offering only a 50-foot buffer behind the houses in
 10 my mother's neighborhood.

CRH6-2

11 All this means is that with SR-509, logging,
 12 soil mining, subsequent development plans in the
 13 neighborhood I'm speaking about will be severely
 14 impacted by noise, as if it's not already
 15 unacceptably noisy.

CRH6-3

16 Okay. So I just wanted to say it's not in the
 17 report. I don't understand why it's not in your
 18 report. There are lots of houses over there, and
 19 the neighbors are wondering how the Department of
 20 Transportation plans to mitigate for the additional
 21 noise pollution and inevitable decrease in the
 22 value of their homes when SR-509 goes in. Thank
 23 you.

24 MR. BAILLIE: Thank you. Next is Mel Roberts,
 25 followed by David Hoffman and Robert Backs.

Response CRH6-2

Noise comment: response to be provided

Response CRH6-3

Noise comment: response to be provided

MEL ROBERTS

Hi. My name is Mel Roberts. I'm an avid bicycle rider and occasional commuter.

One of the things that I realized when you put an item like Interstate 5 and SR-509 is that you create a barrier to any kind of commuter bicycle traffic. And one of the things that I think is real important is that at the intersections, the interchanges, the underpasses, the overpasses that cross I-5 and 509, that you provide either a bicycle-rideable shoulder or bicycle lane that can be used for bicyclists. It's a safety item.

There is a lot of contention with cars, because you funnel all the cars through this narrow bottleneck as well, and if we've got a way to get through there bicycling safely, without too much conflict between cars, it would help immensely.

There's probably a few places where there are dedicated right-turn lanes, and if you can have a bicycle lane going between that dedicated lane so the bicycle rider can go through and have a little safety island there, as well, while he waits for the light to turn, it helps immensely in being able to go through there.

CRH7-1

CRH7-2

Response CRH7-1

Please see responses to Comments C4-1 from David Hoffman and P2-1 from Jacob Grob et al.

Response CRH7-2

Please see response to Comment P10-1 from Steve Nuss.

1 That's a safety feature that's needed in these
2 areas, and this stretches from both the SeaTac-end
3 of the project at 188th clear down to the south end
4 at 227nd, all of the various places where you go
5 over or under that road. Thank you.

6 MR. BAILLIE: Thank you, sir. Next is David
7 Hoffman, followed by Robert Back and Rose Clark.

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1 DAVID HOFFMAN

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3 My name is Dave Hoffman, 25334 45th Avenue
4 South in Kent. That's on the West Hill of Kent
5 just south of Midway intersection.

6 I believe that the SR-509 project is
7 overlooking an important part or important
8 component of the transportation picture on West
9 Hill in Kent. That's as Mr. Roberts suggested -
10 cycling.

11 I'm a long-term commuter bicyclist, 36 years
12 on the road, and I've used Midway intersection on a
13 regular basis. With the increase in traffic and
14 some of the engineering improvements that have
15 happened there, I'm finding my access being made
16 more dangerous and more inhibitive. I strongly
17 recommend that your project include in-street
18 bicycle lanes to transect the Midway intersection
19 between Military Road South and Pacific Highway.

20 **CRH8-1**

21 That intersection is vitally important to
22 people who live on West Hill and especially for
23 non-motorized transportation practitioners like
24 myself because there are only three ways to get
25 across I-5 on West Hill in Kent. One of them is
Midway interchange, which is virtually unusable for

Response CRH8-1

Please see response to Comment P2-1 from Jacob Grob et al.

1 most people, the other one is Reef Road, and the
2 other one is South 272nd. Those intersections are
3 a mile or more apart.

4 Now, part of your benefits, as stated earlier,
5 was to save two-and-a-half miles of motor traffic
6 getting between Tacoma and SeaTac Airport. But if
7 I can't get through Midway interchange, I have to
8 go at least two miles out of my way to find a place
9 where I can cross I-5. And that costs me a lot
10 more than it costs somebody in a car. I believe
11 that in-street bicycle lanes will improve the
12 functionality of Midway interchange over, above,
13 and beyond what you stated in your earlier
14 presentations today. That ends my statement.
15 Thank you.

16 MR. BAILLIE: Thank you. Next is Robert Back,
17 followed by Rose Clark and Steven Richmond.

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ROBERT BACK

Hi. Robert Back, 23840 16th Lane South here in Des Moines.

When the original 509 freeway was bring constructed, the plan was to bring this freeway to the Kent-Des Moines Road. There were some complications within the City of Des Moines, and the State Department of Transportation decided to stop this project at South 188th Street. To this day, the State still owns right of way from approximately 188th to Kent-Des Moines Road which comes out right near the Barnes Creek Trail, close to 16th Avenue South. I would like to see that this unused right of way be given back to the city.

I'd also like to read from the City of Des Moines 2002 intergovernmental relations and policies and positions with the state of Washington. "The City of Des Moines also supports legislation returning to Des Moines at no cost and with no conditions any portions of the SR-509 right of way that will not be used for traffic improvements."

So I believe that by the time this project starts -- and I realize the state is short of money

CRH9-1

Response CRH9-1

The unconstructed SR 509 right-of-way was purchased with Motor Vehicle Funds (the gas tax); these funds can only be spent on highway projects. If property that was acquired with these funds becomes surplus, state law requires the department to receive fair market value, even from other government agencies.

1 at this time -- that land should be given back to
2 the City of Des Moines at no cost. Thank you.

3 MR. BAILLIE: Thank you. Next is Rose Clark,
4 followed by Steven Richmond and Arlene Brown.

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ROSE CLARK

I am Rose Clark, deputy mayor of the City of Burien. I want to make sure that I am allotted time to read the official statement from Burien and make some comments of my own. Thank you.

This is a letter that I have given a copy of to one of your folks to enter into the record, signed by our mayor, Wing Woo.

"Burien is a community with great connections. We are just 12 minutes from Seattle, 5 minutes from I-5, and 7 minutes from SeaTac International Airport. The intersection of 509 and 518 serves as the main entrance to the City of Burien. We expect the SR-509 corridor extension to make our city more accessible and make it easier for people to come here to do business and to visit.

Other benefits of this project are extending this corridor will help reduce congestion in south King County by providing an alternate route to I-5 and increasing freight mobility between Seattle, King, and Pierce County for marine and air cargo.

It will provide regional market access to Burien's commercial center and increase our ability to realize our goal of economic revitalization and

Response CRH10-1

Thank you for your comment.

CRH10-1

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CRH10-1

downtown redevelopment.

The Washington State Department of Transportation will help us and our neighboring communities to work together to reduce impacts to our wetlands and parks, improving fish habitats, improving and expanding the off-highway trails and bike paths connecting north to SeaTac, Burien, and the Duwamish bike facility. For these reasons, we support the SR-509 extension project.

With our support, we ask that you consider how our community will be impacted. We also ask that the state expand its project impact to include other considerations. The overall success of the project's goal is to enhance mobility, safety, and environmental conditions. To accomplish these goals, we request that the project address the concerns listed here.

CRH10-2

Future traffic impacts. The intersection of SR-509 and SR-518 is the primary entrance into our city. It is a very high-accident location and operates now at a service level E and F, the highest rating for congestion. Extending the SR-509 corridor will increase traffic even more and make this intersection in even greater need of improvements. We ask that you fund the design

Response CRH10-2

Please see response to Comment L2-2 from the City of Burien.

CRH10-2
(cont.)

process that would implement improvements to this interchange as a set of improvements to be made as traffic loads increase due to the SR-509 southern extension.

Logic and public safety support this request.

To build a freeway connection north into Burien and downtown Seattle and not design improvements at the SR-509/SR-518 interchange will be an expensive investment to improve freight mobility with marginal payback.

CRH10-3

Our gateway improvements in Burien. The SR-509/518 intersection is designed as a gateway in the City's comprehensive plan. With the extension of SR-509, there will be significantly increased traffic and visibility for our city. As mitigation for the increased traffic, we ask that signaling, lighting, and landscaping along the sides leading to the intersection, and landscaping at the intersection be included in the budget and plans for the whole corridor. These improvements have been made on other state facilities in the region and should be made on the north end of the route extension.

Burien and other nearby airport communities should be eligible for trees and additional

Response CRH10-3

Please see response to Comment L2-3 from the City of Burien.

Response CRH10-4

Please see response to Comment L2-4 from the City of Burien.

1 landscaping that create a quality and inviting
2 entrance to our cities. Burien wishes to be a
3 partner planning for these improvements. And
4 traffic noise impacts on neighborhoods.

5 Finally, we ask that you consider the noise
6 impacts extending this corridor will make. The
7 corridor extension will impact our Manhattan
8 neighborhood west of 8th Avenue South. Increased
9 **CRH10-4** traffic, especially freight traffic, may cause much
10 more substantial noise impact to neighborhoods
11 further north in the city. We request further
12 analysis of the noise impacts to the adjacent
13 neighbors, both during construction and after the
14 project is completed.

15 If you have any questions, please call our
16 city manager, Gary Long." And that's signed Mayor
17 Wing Woo.

18 Personally, I also support the project. I
19 have lived in Burien for 37 years. There are many
20 aspects of the project that I favor, and one is
21 relieving traffic congestion on I-5. A few years
22 ago, there was a very bad accident on I-5, and when
23 that happened -- happens, period, not just in the
24 past tense -- all of the traffic congestion bounces
25 down on our surface streets.

Response CRH10-5

Please see response to Comment L3-4 from the City of Burien.

1 When that major accident happened, a child in
 2 Des Moines was killed. It took me probably about
 3 45 minutes to go less than two miles, the
 4 congestion was that bad. And it was in congestion
 5 like that this community lost a child. So for that
 6 reason, alone, I support this project.

7 Trying to move in traffic from I-5 to SR-509
 8 should help with that. Regional access to Burien,
 9 SeaTac, and Des Moines is welcomed. Connecting
 10 with light rail and the airport is a plus, and
 11 building a bypass from Des Moines to Burien is near
 12 and dear to my heart. I would like to see it go
 13 all the way up to the Duwamish so we can connect
 14 regionally.

15 But all of these things are wonderful, as long
 16 as we remember 518 and 509. And I want to give you
 17 a little visual in case you haven't been there.
 18 This is the area that our comp plan does identify
 19 as the gateway to our city. When you are on 509,
 20 it doesn't matter if you are going north or south.
 21 If you're going to enter 518 going east or west,
 22 you have to come to a stop at major traffic stops.
 23 In order to exit 518 onto First Avenue South, you
 24 have three traffic lights in an area that is like
 25 one-and-a-half to two blocks long. So it is a

CRH10-5

1 major -- traffic backs up in a very major fashion
2 there, all along 509 and 518. So, again, along
3 with our mayor, I'm really hoping that you'll take
4 a look at that.

5 **CRH10-5**
6 **(cont.)**

A few months ago I was talking to someone from
DOT about this, and the person -- and I don't
remember who the person was -- indicated that 518,
the interchange there, is only going to be
temporary, we would look at it in about 20 years or
so. That was the plan at the time. And I was
struck by the fact that in the next 20 years, those
people that are killed in accidents there are not
temporarily dead, they're really permanently dead.
The people that are injured are also permanently
injured.

16 So, again, I hope that we will work on
17 518/509. It's a very exciting project. Thank you
18 very much.

19 MR. BAILLIE: Thank you. Next is Steven
20 Richmond, followed by Arlene Brown. Arlene is the
21 last of the people who have signed up to speak.
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1 STEVEN RICHMOND

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3 My name is Steven Richmond. I live at 6502
4 18th Avenue Southwest.

5 Fifteen years ago I worked as a news
6 photographer in Burien and Des Moines for a period
7 of about four years. I came to recognize the
8 pattern of crime, tragedy, and neighborhood decay
9 that appeared to happen in roughly straight lines,
10 along routes that would make logical extensions to
11 our freeway system.

12 One of the first new freeways I suspected
13 based on crime rates was in SeaTac. And without
14 any knowledge of DOT plans, I went to South 211th
15 between Pacific Highway and I-5 and started
16 knocking on doors. And I found out that, yes,
17 SR-509 would probably go through or under the
18 neighborhood to extend 509 to I-5. On further
19 research, I recognized that 90 percent of the major
20 crimes in the vicinity that I was aware of as a
21 news photographer matched a DOT alternative route
22 proposal like a fingerprint. This is the proposal,
23 the EIS Statement. It's alternatives that could be
24 considered.

25 What this means is when DOT makes public

1 proposals for different routes, this is an
2 announcement to land speculators that land values
3 may change and that there is potential for profit
4 along these corridors if they can pressure out
5 long-time land owners.

6 Now, so far, based on crime rates, I have
7 guessed the path of four future freeways or
8 arterials that transportation experts have
9 confirmed have been proposed or are in the works.

10 One that is of interest is that the Michigan
11 Street connection from I-5 to 509 is inadequate for
12 freight, and there is a pattern of crime that goes
13 through George Town and South Park and suggests to
14 me that it will need an arterial connection to 509
15 so freight traffic can avoid the congestion at
16 South Center.

17 Given that the pressures of international
18 trade are focused on the Puget Sound region,
19 because of our 24-hour time advantage, being closer
20 to Pacific Rim exporters, and given that there is a
21 closing window of opportunity to open
22 transportation bottlenecks before trade interests
23 go to other ports, given this pressure, the
24 pressure to clear roadblocks is immense.

25 When you consider the rights of property

1 owners who are in the way of these freeways, and
2 that historically property owners and neighborhoods
3 have delayed and in some cases stopped freeway
4 construction, it's not hard to imagine that this
5 inherent conflict between private property rights
6 and growth might lead to unprincipled methods of
7 land acquisition on the part of interests who lose
8 millions of dollars stuck in traffic.

9 Our freeway system is of strategic importance
10 to international economies, and a small number of
11 property owners can have a huge effect on the
12 economies of entire countries.

13 I am not suggesting that the DOT is conspiring
14 against property owners, because the focus of
15 engineers is limited in time and scope and without
16 knowledge of long-term history of land ownership.
17 But from my perspective, it appears that death
18 rates are higher for property owners and next-
19 generation owners who are in probable paths of
20 freeway improvements.

21 I am suggesting that organized crime is
22 removing private property obstacles decades in
23 advance in order to create options for DOT and to
24 reduce obstacles to these freeway improvements.
25 The improbability of these crime patterns being in

1 linear paths is compelling enough to warrant
2 further study to either confirm or refute my
3 assertion.

4 I am asking that the government compile
5 health, crime, and traffic statistics according to
6 the criterion of whether a tragedy expedited the
7 transfer of land ownership. The Department of
8 Health already has a map of cancer problems in the
9 SeaTac area, and I'm suggesting they overlap this
10 with other statistics. Given the value of land and
11 the future international business in the Puget
12 Sound region, it would be willfully ignorant not to
13 recognize the potential for wrongdoing in land
14 procurement, just as it would be naive not to
15 expect insider trading on the stock exchange.

CRH11-1

16 Government has a responsibility for public
17 safety, and I am suggesting we need government and
18 citizen oversight regarding the fairness of land
19 dealings. I am asking that government proactively
20 address this issue for the sake of all concerned.
21 I have been handing out my argument -- which is in
22 written form and it is available tonight -- handing
23 out my argument to neighborhoods that I believe are
24 in harm's way. And if I am right in my
25 projections, there is the risk that public opinion

Response CRH11-1

Thank you for your comment. This information is not a requirement of a NEPA/SEPA evaluation and is therefore beyond the scope of this EIS.

1 will be polarized against freeway improvements when
2 **CRH11-1** people realize the reasons behind their
3 **(cont.)** misfortunes.

4 I'm asking that you carefully consider my
5 observations and that property owners who think
6 they may have been affected by this problem also
7 carefully consider my arguments. Thank you.

8 MR. BAILLIE: Thank you. Arlene Brown?
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ARLENE BROWN

Arlene Brown, 239 Southwest 189th Place,
Normandy Park 98166.

I read through the on-line version and I
appreciate your taking the effort to do that,
because I never quite made it to the library
because I had pneumonia.

So there are several issues as I read through
that -- for instance, the earthquake analysis you
reference back to Gower (phonetic). If you go to
the ship stuff, and I'll hand this in, as well as
stuff that they learned from the last earthquake,
you'll find they're now projecting that there is a
fault line that's running north/south right where
we're talking about, and that needs to be
considered in any of the analysis and design. And
that intersects with the Seattle fault, which
actually is quite wide, which kind of extends down
here as well. So we have the two faults to worry
about.

It's compounded by the fact that the record-
breaking mechanical stabilized wall that's
recommended for the third runway is only about half
as thick as it should be, and their earthquake

Response CRH12-1

Please see response to Comment P5-42 from Arlene Brown.

CRH12-1

1 analysis doesn't even predict one of the major
2 earthquakes out of the last three. In other words,
3 it's going to fail in an earthquake because it's
4 too expensive for them to design it properly. And
5 if you go into the ACC's various experts' analyses
6 that were submitted to the Corp of Engineers, they
7 have slide projections which indicate it will go
8 over to the highway.

9 There's other problems, such as in California
10 with soft soils -- all this red area is soft soils.
11 When they did this study -- you mentioned some of
12 their studies. Well, unfortunately, they used the
13 wrong drilling equipment, so it wouldn't identify
14 soft soil. So the soils actually is probably much
15 more than what's actually mapped. And the problem,
16 for instance in California, is when you have
17 heavily loaded soft soils, they continue to move
18 for up to an hour after the earthquake, so your
19 overpasses sustain more damage and fail. So that's
20 a real good reason to not allow the third runway,
21 if you want to go and put money into improving the
22 highway.

23 The other problem with the MSE wall is that it
24 **CRH12-2** will reflect noise incredibly. Just that truck
25 construction thing has changed the noise so that

Response CRH12-2

See responses to Comments L2-4 and P5-24.

1 six blocks west and about eight blocks south you
 2 can hear noise of Highway 509 because they've cut
 3 down some trees, plus you added that overpass, and
 4 all that combined. So any noise analysis and noise
 5 mitigation needs to go far beyond what's in the
 6 present proposal, because you have to do the
 7 cumulative noise of airport plus this.

CRH12-2
 (cont.)

8 And if you need precedent, you can look at,
 9 for instance, the noise mitigation at major
 10 airports. I believe it's, like, the Minneapolis
 11 one where they literally close the road if they're
 12 using a runway and vice versa. So there is
 13 precedent for this. You really need to look at all
 14 of it.

15 The other area is with regard to the air
 16 analysis where you spend a lot of time on carbon
 17 monoxide -- and I will enclose this. This shows
 18 you the ozone, and you can see this huge ozone
 19 spike for 1998 that had to do with our hot weather.
 20 And, actually, the real problem in Puget Sound --
 21 and I also give a link to a map, and that is
 22 actually ozone, and we create nox at the airport,
 23 and then the wind will blow it. And then just like
 24 in California -- which is why California has more
 25 strict regulations than the federal regulations --

1 the mountains trap it. So you can be under the nox
 2 limit at the airport and cause an ozone exceedence
 3 downwind of it because the nox converts and gets
 4 trapped by the mountains.

5 For this reason, you need to go in and do an
 6 air conformity analysis, because you're going to
 7 actually create more than 300 tons of nox and add
 8 about a hundred tons of nox if you're ever required
 9 to do a full up clean air conformity analysis. The
 10 reason that you have to do that is because the
 11 supplementary EIS for the master plan update for
 12 the third runway clearly stated that the airport is
 13 actually surface-transportation limited. It says
 14 the runway really wasn't going to do much of
 15 anything. It said it couldn't do much because the
 16 real problem is surface transportation. Third
 17 runway is just a construction boondoggle. It
 18 brings in a million and a half double hull trucks,
 19 keeps them busy.

20 And there are all kinds of aerospace experts
 21 that have testified that, if anything, a third
 22 runway is actually going to increase delays.

23 However, this project really will increase the
 24 airport capacity, and once you increase the airport
 25 capacity, that's more traffic to the airport so you

CRH12-3

Response CRH12-3

Ozone precursor emissions from the proposed SR 509: Corridor Completion/I-5/South Access Road Project are included in the latest regional analysis of the Metropolitan Transportation Plan (Destination 2030) as refined in June 2002 by the Puget Sound Regional Council. This analysis demonstrates that regional NOx and VOC emissions from transportation sources would be below the regional emissions budget for 2020 and 2030. Air pollutant emissions from Sea-Tac Airport would occur independently of the proposed SR 509: Corridor Completion/I-5/South Access Road Project and are addressed separately by the Port of Seattle.

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CRH12-3
(cont.)

have more traffic because of the highway and more traffic because of the airport, and you have ground and air traffic. And that's why you're going to trigger it.

CRH12-4

And I realize the models are conservative, but the models will predict over 300 tons of nox, so the real number is at least a hundred tons of nox, which you can measure with a monitor. And thank you very much. My time is up. Go do a safety analysis for people, too, because it will reduce lives.

MR. BAILLIE: Thank you. That completes the people who have signed up prior to the start of the hearing. Would anyone else like to speak? If so, raise your hand.

State your name and address, please.

Response CRH12-4

Regional transportation-related NOx emissions for 2020 and 2030 for the Puget Sound region, including the proposed SR 509: Corridor Completion/I-5/South Access Road Project, have been predicted by the Puget Sound Regional Council to be less than the regional transportation emissions budget. The regional emissions budget is established to ensure that the region remains in attainment for the National Ambient Air Quality Standards (NAAQS), which have been established to be protective of human health and welfare.

BOB POND

My name is Bob Pond, and I've lived at 23116 30th Avenue South for 12 years.

I have observed the flow of traffic for quite some time. I've been retired. My concern is on 30th and Kent-Des Moines Road. It's a death trap. If you take a left to go to the freeway, and you're going to add another intersection to that area, which would make it even more of a bird's nest, I'm not really sure how to solve it. On the Kent side they did a right turn only. That would kind of close us off if they did it on the other side. They say it's too close of an area to put multiple lights. I don't know. I think that that intersection should be analyzed even though it's just outside of your targeted area.

I'm all in favor of the 509. It's 20 years too late. I think they should do Highway 18 also. It would solve the whole south-end problem. My biggest concern is being a resident there and it's going to be coming within 50 feet of my property. Last summer the noise was unbearable. I don't know how to describe it. It's like a 747 sitting over the top of your house, staying there. It just

CRH13-1

CRH13-2

Response CRH13-1

The proposed project would provide some relief to the congestion at the SR 516 interchange and along SR 516 by providing an I-5/South 228th Street connection as well as reconfiguring the existing SR 516 ramps to improve operational efficiency. Some of the traffic that currently uses SR 516 will use South 228th Street, thereby reducing traffic volumes on SR 516. Other improvements at SR 516 include a collector/distributor system from I-5 to SR 516. For a complete list of improvements on I-5 at the SR 516 interchange, please refer to Section 2.3.2 of this FEIS.

Response CRH13-2

Thank you for your comment.

1 doesn't move. I spoke to people, they were
2 somewhat, kind of, if you were in-their-face
3 mentality, they will listen to you. I didn't like
4 the response. I hope this next summer it can be
5 better. If not, my neighbors are going to get
6 together and we're going to do something about it,
7 **CRH13-3** and I have many options. In other words, I am not
8 going to be the sacrificial lamb to your freeway
9 project of noise.

10 My recommendation is that you build the sound
11 wall first. That might help. I've been told that
12 that's how it's done, you divvy it out and then you
13 put the wall up and then you build from the wall
14 back. Anything. Once your windows are open in the
15 summertime, it's unbearable. You can't sleep. You
16 have to experience it. And the DOT was not very
17 receptive. I just don't want another repeat of
18 last summer, and you guys have been working right
19 in front of my -- within a hundred and fifty feet
20 of my property.

21 So I guess that's really all. My concern is
22 the noise that will be ongoing for years building
23 this; hopefully -- I mean, quickly, they will get
24 it done. And the environmental study on that
25 intersection of 30th and Kent-Des Moines Road.

Response CRH13-3

WSDOT has conducted a thorough study of noise impacts on residential areas within the SR 509 project. WSDOT is committed to providing noise mitigation through barrier construction in all locations where it is reasonable and feasible to do so. A noise barrier has preliminarily been recommended to reduce future I-5 noise within the area of concern. A noise barrier will be constructed between this area and the highway if, based on final design information, the barrier remains reasonable to build.

In order to reduce construction noise impacts, where possible, WSDOT will make every effort to plan for construction of noise barriers prior to other roadway construction elements.

1 That's about it. Thank you very much.

2 MR. BAILLIE: Thank you. Anyone else?

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GERALD MCGINNIS

My name is Gerald McGinnis 419 Southwest
182nd, Normandy Park.

I use 509 daily from South 188th to my place
of business which is in South Park, and I'm very
concerned about the impact of the traffic flow over
the First Avenue South Bridge. It seems very
shortsighted to me that everybody says to improve
traffic flow in the south end when you have a
traffic light at the end of the freeway and you're
putting everybody on to surface streets. The
bridge, since it's been rebuilt, the additional
lanes added, it's been great for traffic. We cross
that bridge probably 20 times a day during the
course of business. If the freeway runs into the
First Avenue South Bridge, I would like to see that
there is some plan to mitigate the impact of
thousands of more cars a day at that intersection
of East Marginal Way and the First Avenue South
Bridge. Thanks.

MR. BAILLIE: Thank you. Anyone else?

Response CRH14-1

Please see response to Comment CRH-5 from Claire Everett.

CRH14-1

1 CLAIR EVERETT

2
3 Claire Everett. I'm at 163 Southwest 192nd
4 Street, Normandy Park. I've made my comments to
5 the court reporter and won't go into that, my
6 strong feelings about this project.

7 I do see that it's going to be done -- I have
8 the feeling it will be done no matter what we say
9 or do. However, I have attended hearings in
10 connection with the third runway and the
11 acquisition of homes. And during those hearings,
12 these people who were going to have their homes
13 bought by the Port of Seattle for the third runway
14 were told, We will give you fair market value. And
15 these poor people who had these homes for many,
16 many years believed they were getting a good deal.
17 They didn't know that because of the threat of the
18 third runway, their fair market value had
19 plummeted.

20 And I'm just hoping that you give these people
21 a fair chance as to what fair market value would be
22 prior to the threat of the 509 extension.

23 MR. BAILLIE: Thank you. Anyone else?

24 Thank you all very much for your comments.

25 The open house portion of the meeting will

Response CRH15-1

Any acquisition appraisal for a public works project must ignore any effect the pending project has on market value. This means that if the sale price of your home dropped after the announcement of the project, our appraisers would look at other unaffected neighborhoods or at previous sales in the same neighborhood to determine the market value.

CRH15-1

1 continue. Staff will be here, displays are set up
2 here and over across the way. If you still have
3 questions or you want to make comments, the court
4 reporter is still here. You, of course, can
5 comment in writing or by e-mail on the addresses
6 shown. The deadline for comments is March 25th.

7 MR. STONE: Everybody is getting up here. I
8 just wanted to do a little closing comment, if I
9 might.

10 I do want to thank you for your time, and
11 having worked this for 24 years in my career, we
12 really do appreciate and take your comments. I've
13 seen many projects that have changed, have been
14 modified, have been better, based on the public
15 input and public comment. So I guess I'm asking
16 for a little bit of trust along those lines.

17 I heard specifically noise, noise impacts,
18 construction noise, what we have been doing on I-5
19 now. One of the things we are talking about is
20 early environmental investment, so some of the
21 storm water, wetlands, the noise wall questions,
22 those are things we need to look at as an approach,
23 and I appreciate that.

24 I heard the comments on cycling, cycle safety.
25 Some of the interchanges we have are not

1 bicycle-friendly. We do have some good aspects of
2 the bike trails. I think we need to look at the
3 surface and work with the cities, also, as to their
4 bike plans.

5 The existing right of way on 509 that we had
6 down to 516. It is true. In the early 70s we
7 purchased the 516; in fact, the plan was to go to
8 Commencement Bay area and tie in 509 there. That's
9 as far as they went at that point. There's been a
10 lot of alternatives. And this study even looked at
11 going all the way to that point but found it to be
12 infeasible. One of the key objectives is for us to
13 make a determination of what to do with that right
14 of way. Is it truly dedicated, or should some of
15 it be used for some of the wetland mitigation or
16 other components that might be out there? There's
17 also some discussion should there may be a two-lane
18 arterial built, maybe in the SeaTac portion and not
19 the Des Moines portion, or continuing all the way
20 down and tying into 16 and making an arterial. So
21 those are some of the discussions we have been
22 having with SeaTac and Des Moines. Those are
23 things we will continue to look at.

24 The 509/518 interchange clearly is a part of
25 this. I will mention, just as informational, the

1 Department of Transportation has been leading a
2 study of 518 from South Center up to Burien. Very
3 much we're working with Burien and Burien staff, as
4 well as Tukwila and the Port, which identified the
5 concept at the 518/509 interchange; and we have
6 been in discussions with staff from the city as to
7 what the next steps might be. We have identified
8 ability to actually not put a ramp up and over 516.
9 It's kind of interesting -- it actually goes down
10 between 509 and 518 and allows you to come around,
11 but it gets rid of that one right-angle
12 intersection there that we do have a lot of
13 problems with.

14 Landscaping, noise impacts, again. Question
15 here of kind of the social -- and what happens with
16 right of way when facilities come through. I will
17 take a look at that. That is a big question. That
18 is not something that I have seen data or
19 professional opinion on, but we will take that into
20 consideration.

21 The fault line, earthquakes, what's happening
22 north/south. Obviously the anniversary is
23 tomorrow; is that right? But, yes, we will look
24 at that. And I heard, also, the reflection of the
25 build environment if the third runway -- if that

1 major wall is there, what happens with the
2 reflection on the noise analysis coming back
3 through there.

4 Air analysis, air conformity. I will note
5 that the analysis that we do do also includes a
6 regional quality analysis, air conformity, under
7 the Clean Air Act through the complete Puget Sound
8 region. But we will look at that. We will look at
9 the inadequacy of that.

10 Noise, again. The First Avenue South Bridge.
11 Last night, at Burien, we had an Alaska Way Viaduct
12 open house there, with other open houses going on
13 this week with the Alaska Way Viaduct. It kind of
14 ties back to the earthquake. My peer, Maureen
15 Sullivan, right now is doing an EIS, looking at the
16 Alaska Way Viaduct. I talked with her about that.
17 Basically, we come together as corridors at East
18 Marginal. And what we're looking at is doing a
19 transportation study, looking at that and looking
20 incrementally when to do it and what improvements
21 need to be made.

22 The First Avenue South Bridge now is eight
23 lanes crossing the Duwamish river. It's really
24 more of the intersections at First and East
25 Marginal that are really some of the key -- but

1 we'll look at that. There have been a lot of
2 concepts and discussions, and the department
3 recognizes the linkages of those facilities.

4 And fair market value of the homes. That is
5 always a very important part of this. We are
6 definitely -- this is here, processes are put in
7 place to protect the property owners in what we do
8 and determining fair market value. And if fair
9 market value is not agreed upon, basically we also
10 have a process through court and other systems to
11 define fair market value. But it is definitely our
12 intent to make sure that peoples' homes,
13 properties, are made whole. That is a very
14 difficult part of the business and the work that we
15 do in trying to balance the public needs versus
16 individual properties that we have.

17 We have quite a few relocations with the
18 project. Some of it is areas that's Port property,
19 land south of the airport now that is not being
20 used. We also have some other places where we do
21 have single family and multi-family, and there is
22 quite a bit of impact and we recognize that. We
23 want to be as sensitive as we possibly can. I also
24 have real estate staff here that can really talk
25 with you one on one. They would be more than happy

