

From: The Coalition for Sustainable SR 520

To: NCHNA Members

Subject: Open letter to governor about SR 520

04/17/2010

The Coalition for a Sustainable SR 520 has just released an open letter to Governor Gregoire. I've attached an electronic copy.

In the letter, we ask her to read the Coalition's just-submitted comments on the SDEIS (draft environmental impact statement). What we wrote is important. We are showing the reader that the current proposals are really misguided, and will result in continuous congestion in Seattle, excessive pollution from the idling cars, and the taking of parks and open spaces which we all love and use.

We have two major points:

First, the state doesn't have enough money for the whole project, and is using funds to construct the east side before the whole project is designed. The SDEIS says that mitigation on the west side "may come later". Because there's not enough money it seems highly probable that lids and other mitigation won't be built for years. This is not tolerable. Fortunately, the federal law says that for purposes of environmental analysis, one can't "segment" a project, that is cut it into pieces, if it is really one project. Let's hope the governor decides that the whole project, I-5 to Redmond is really one project after all.

Second, we discovered that all along 520 on the west side is a series of parks and protected open spaces. Under a federal law known as "4f", these may not be taken for highways unless alternatives which do less damage have been evaluated and are not feasible. In this case, the SDEIS does not provided the needed analysis of alternatives. Let's hope that the governor comes to understand that and to change the project.

Our comments cover many other areas, some of them technical. They make very informative reading. The full coalition comments are at <http://sustainable520.org/index.php/sdeis-response/>

Many of you helped with these comments: thank you, thank you! Together, we are enormously powerful.

Here is the nine-point summary of our coalition comments on the SDEIS:

Summary

There are nine basic problems with the state's analysis (SDEIS) for the 520 corridor from

I-5 to Medina:

- I) The state has improperly separated the evaluation of the I-5 to Medina segment from the pontoons segment and from the east side segment. In fact, these are interdependent parts of one project.
- II) The state appears to have made a decision already, and to be going through a paper environmental review process while subverting the intent of the laws.
- III) The SDEIS does not demonstrate that people and goods would move better after the construction. The methodology for estimating demand and assessing congestion is fundamentally flawed.
- IV) The state is planning to take protected parkland for most of the length of 520 on the west side, destroying a unique chain of linked parks and bays. Federal law requires seeking alternatives rather than taking parkland or harming historic areas.
- V) The state has not analyzed obvious alternatives which might have better results and do less damage, including a tolled, transit-priority 4 lanes which might be adequate for some years until additional funding is available, and a 6 lane alternative with 2 lanes used for light rail.
- VI) The SDEIS does not correctly describe the Current Proposals . The SDEIS also does not adequately describe the current congestion in Seattle, the planned projects will increase that congestion, and the lack of space for additional cars.
- VII) The SDEIS does not adequately describe the effects of this highway expansion on air pollution and human health. The state has an obligation to seek alternatives which will do less damage.
- VIII) The state plans to start expanding the east side of 520 this year. The whole program is at least \$2 billion short on funding, and the state is choosing to use the available funds for an area which has no safety problems, rather than to do a safety project for which funding is available.
- IX) The costs to businesses, families, and travelers are not fairly portrayed. Almost no mitigation of damages is promised. Noise reduction levels, limits on air pollution, offsets for construction damages, and lids are either ignored or presented as optional.