Code Number			Name	Comment	Response
C1	SOL	1	Linda L. Jones 8725 126th Ave NE Kirkland, WA 98033 Agency: Public	A. Problem: State Hwy #908 (85th Street) Exit 18 off 405 1) Traffic is at Peak and Volumn is increasing rapidly. 2) Vehicles are backing up into the exit ramp that heads east by the Lee Johnson's Chevrolet car dealership. 3) West bound traffic is backing up for miles daily into Redmond. 4) 85th Street Corridor Study allocated more business zoning east of Costco by 90th St. B. General Cause: 1) Cars turning left (north) onto 120th Ave NE, 122nd Ave NE, and 124th Ave NE, the left turns are so long from the volumn turning left (north), it holds up the flow of vehicles driving west from Redmond. C. Solution Suggestion: A fly over bridge connecting the east bound exit off I-405 to 90th Street/Business District and Costco a) or a lower exit from I-405 like Totem Lake 124th Street exit. If vehicles turning left north onto 120th Ave NE, 122nd Ave NE and 124th Ave NE were to take an exit that feeds to 90th Street, then an exit that extends to 90th Street will eliminate long traffic stop signals delays from left (or northbound) turn onto 120th, 122nd and 124th Aves. Therefore eastbound traffic on Hwy 908/85th St from Redmond will flow more smoothly. (See Figure in original correspondence)	Thank you. Improvements to SR 908 are included within the City of Kirkland's plans and the I-405 Corridor Program action alternatives. These include limited widening of SR 908 in the vicinity of the I-405 ramps and transit/HOV improvements along 85th to Redmond. The I-405 Corridor Program did not evaluate specific intersection issues given its programmatic nature.
C2	SOL	1	David L. Thomas 17408 NE 19th Place Bellevue, WA 98008-3135 Agency: Public	I believe that with a continually increasing number of travelors on the I-405 Corridor, neither of the two expensive alternatives, (1) increasing the number of lanes or (2) rail transit will reduce traffic congestion to acceptable levels.	Thank you for your comment.
C2	TR	1	David L. Thomas 17408 NE 19th Place Bellevue, WA 98008-3135 Agency: Public	The major effort must be directed to increasing the number of occupants per vehicle. Better bus service would help. But many more people could be encouraged to share private vehicles if car pools could be created each day. Similar to the system in Singapore, people should be encouraged to pick up passengers at bus stops. Drivers willing to pick up passengers might register and receive cards for displaying their destinations and sign up sheets for the passengers they pick up.	The idea of informal carpools has been used in limited locations around the United States. Also, there is beginning to be some limited experience with what are called "locational efficient mortgages", including within the Seattle area. This concept provides a slightly reduced home mortgage rate for those who locate near transit service. The same idea could be applied to moving closer to work. Both of these strategies fit within the demonstrations component of the TDM program.

Code Number			Name	Comment	Response
				They would be rewarded for each passenger they transport. They might also give a receipt to the passengers, so the passengers could be rewarded. The result would be that at any time, a driver or passenger could go to a nearby buss stop to participate in a carpool. This would be a low cost alternative to more cement or more rail, and serve neighborhoods better. Another possible strategy is to reward people who move closer to their place of work, perhaps by paying for the shortened commutes. Thanks.	
C3	ALT	1	George Joi 8221 122nd Ave NE Kirkland Agency: Public	I would like to echo the reservations made by several citizens against adding two general purpose lanes in each direction on I-405.	Your concern was presented to the decisionmakers; however, the Preferred Alternative does include up to two additional lanes in each direction on I-405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C3	N	1	George Joi 8221 122nd Ave NE Kirkland Agency: Public	I live 2 blocks east of I-405 and there is a significant drone of traffic from I-405 almost round the clock. 4 additional lanes will certainly increase this sound to a roar and dramatically reduce the livability of our neighbourhood. A large number of communities will be negatively impacted by the sound and congestion on the arterial streets.	Traffic noise in the I-405 corridor will increase in the future under all of the alternatives, including No Action. Even if the maximum noise levels do not increase, the number of hours per day with high traffic volumes will increase. At this program stage, the potential for noise increases under each of the alternatives has been evaluated. Noise impacts at specific locations along the corridor, along with mitigation measures such as noise walls (noise reduction) will be evaluated as detailed project designs are developed for specific corridor transportation improvements. One of the goals of the I-405 Corridor Program is to reduce congestion and associated impacts on the local arterial network. The capacity expansions on I-405 contained in the Preferred Alternative would shift some traffic back to I-405 from the arterials.
C3	ALT	2	George Joi 8221 122nd Ave NE Kirkland Agency: Public	There must instead be an increased emphasis on effective and efficient ways to transport people. Express lanes for transit is a good idea. There needs to be a strong incentive for people to switch to other modes of transportation. I don't see this incentive in alternative 3.	Alternative 3 attempts to provide improved mobility for all travel modes, including transit. Table 2.2-1 of the Final EIS shows the elements included in Alternative 3. Similar to Alternative 3, the Preferred Alternative is a multimodal solution that includes bus rapid transit operating in improved access HOV lanes. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
C4	ALT	1	Lacey Stuart 11804 SE 5th St Bellevue, WA 98005 Agency: Public	I strongly oppose Alternative 4: the BNSF Alignment. Please don't consider putting a freeway along the railroad because it would 1) be destroying a historic landmark and 2) cause many people to be uprooted.	Alternative 4 did not include putting a freeway within the Burlington Northern Santa Fe (BNSF) Railroad alignment, as implied in your comment. Alternatives 1 and 2 proposed a physically separated fixed-guideway high-capacity transit system within the BNSF alignment. The Preferred Alternative does not include a change in the current use of the BNSF right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.
C5	ALT	1	Lesley Stuart 11804 SE 5th St Bellevue, WA 98005 Agency: Public	I definitely oppose Alternative 4 BNSF Alignment. Please do not even consider a freeway where the current railway is. Part of that path runs directly through a historic neighborhood (from 1903!)	Please see response to comment C4.ALT-1.
C6	ALT	1	Mark Allen 12021 SE 11th St Bellevue, WA 98005 Agency: Public	I would like to see the BNSF right of way reserved for non-motorised use only, especially thru downtown Bellevue.	The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe (BNSF) Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. The Preferred Alternative does, however, include many corridor pedestrian and bicycle improvements. Please see Appendix B of the Final EIS for a list of the corridor pedestrian and bicycle improvements contained in the Preferred Alternative. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C6	N	1	Mark Allen 12021 SE 11th St Bellevue, WA 98005 Agency: Public	If transit is put in this corridor I would expect it to have noise walls. Stacked car lanes would need walls on the upper level that are not currently shown on the plans.	The current plans are conceptual in nature and do not show project details. When detailed project designs are developed, noise impacts will be determined from the individual transit and roadway design elements and specific mitigation will be evaluated.
C7	O	1	Claire Denq 3342 165th Pl NE Bellevue, WA 98008 Agency: Public	Don't spend money on something un-effective. "Decentralize" a little should do it.	Thank you for your comment.

Code Number			Name	Comment	Response
C8	SOL	1	Roxann Ketch 14240 SE 18th St, D-4 Bellevue 98007 Agency: Public	- Bus rapid transit needs to be the highest priority. - Removing large truck traffic to dedicated lanes or increase rail transport would aid overall flow. - Improve P&R lots to allow for rapid commutes. Make freeway stations accessible and comfortable. - Avoid widening I-405 due to high cost of right-of-ways. Building more only brings more. Alternative 2 shows balance in the approach if widening I-405 is removed.- Every effort should be made to improve bicyle and pedestrian access.	The Preferred Alternative contains a bus rapid transit system operating in improved access HOV lanes, as well as other substantial improvements including park-and-ride lots, transit stations, bicycle and pedestrian facilities, and truck freight enhancements. The Preferred Alternative also includes up to two additional lanes in each direction on I-405 to help reduce congestion and improve mobility across all transportation modes. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C9	SOL	1	Mike Losh 9700 SE 61st Place Mercer Island, WA 98040 Agency: Public	Please do not create another "viaduct" like structure along Lake Washington. More lanes are a very short term solution if at all. Concentrate on rapid transit and other ride share incentives.	The I-405 Corridor Program does not propose a viaduct along Lake Washington. The Preferred Alternative does contain a bus rapid transit system operating in improved access HOV lanes and substantial commitments to TDM and ride-share options, as well as up to two additional lanes in each direction on I-405 and a wide range of arterial improvements. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C9	O	1	Mike Losh 9700 SE 61st Place Mercer Island, WA 98040 Agency: Public	Extra lanes add lots of runoff into Lake Washington. Increase noise and eventually more congestion effective many neighborhoods.	Thank you for your comments regarding runoff, noise, and congestion.
C9	SOL	2	Mike Losh 9700 SE 61st Place Mercer Island, WA 98040 Agency: Public	Lastly if possible develop alternative routes for better collateral circulation rather than just growing a single corridor -- once it gets conjested/jammed due to colume accidents etc -- there are no alternatives.	Thank you for your comment regarding alternative routes. Please refer to the response to your comment C9.SOL-1.
C9	O	2	Mike Losh 9700 SE 61st Place Mercer Island, WA 98040 Agency: Public	Please don't ruin the south part of Lake Washington -- few cities have such a great natural asset.	Thank you for your comment.
C10	O	1	Gordon E. Alberti 17414 N.E. 35th Pl Redmond, WA 98052 Agency: Public	Solve the $ problem and build the damn highway -- in 38 yrs nothing has been done!	Thank you for your comment.
C11				There is no correspondence numbered C11. This gap in the comments sequence is the result of a coding error.	

Code Number			Name	Comment	Response
C12				There is no correspondence numbered C12. This gap in the comments sequence is the result of a coding error.	
C13	ALT	1	David F. Plummer 14414 NE 14th Place Bellevue, WA 98007 Agency: Public	1. Please implement the "No Action" alternative as it has the least cost, and least total impact on the environment of the I-405 corridor.	Based on the analytical results discussed in Section 3.12.4.1 of the Final EIS, the No Action Alternative would not be effective in meeting the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C13	SOL	1	David F. Plummer 14414 NE 14th Place Bellevue, WA 98007 Agency: Public	2. The need for expanded capacity in the I-405 corridor is driven primarily by the excessive population and job/employment allocations from the Washington State OFM, and by the restrictions imposed by the Urban Growth Area boundaries in the Puget Sound Region. If these artificial restrictions were removed, the demand for increased capacity in the I-405 corridor would be significantly reduced. This alternative should be extensively and vigorously evaluated before proceeding further.	Changes to the Washington State Office of Financial Management population and employment allocations and to the region's Urban Growth Area boundaries are outside the scope of this EIS. These are elements of the regional land use and transportation planning framework that has been adopted by the Puget Sound Regional Council and the local jurisdictions. The I-405 Corridor Program alternatives are intended to function within this adopted planning framework and be generally consistent with it. In addition, your suggestions are not considered to be reasonable and feasible because they conflict with the purpose of the proposed action, which includes accommodating planned growth.
C14	TR	1	Bill Grundhaus 7001 Ripley Lane N. Renton, WA 98056 Agency: Public	1) I would like to know what value Proposal #5 people have put on the number of people that will be killed crossing the BNSF crossing between Gene Coulon Park and I-90, to say nothing on the area north of I-90	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe (BNSF) Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. Please refer to the response to comment E66.SOL-1.
C14	SOL	1	Bill Grundhaus 7001 Ripley Lane N. Renton, WA 98056 Agency: Public	2) Whats wrong with providing free bus service to see who wants to rise and where they live before we spend any money on a rail system	Elimination of transit fares was not advanced for detailed study because it did not meet the adopted purpose and need for the I-405 Corridor Program. This and the other reasons for not advancing this alternative are discussed in Section 2.2.7 on page 2-22 of the Draft EIS.
C15	ALT	1	Richard Cole POB 612 Redmond, WA 98072 Agency: Public	I prefer alt. 3 or 4. Neither alternative is what I would have done. However, we must move on and do it now. Please get this project designed so that we can concentrate on finding the funding. Do NOT support "#5" it would be a disaster for the Bellevue/Redmond area.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
C16	ALT	1	Wil Nelson 5122 - 155th Pl SE Bellevue, WA 98006 Agency: Public	Build Alternative #3, but set defined goals and if those goals/subgoals are not met stop the project.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C17	O	1	Mike Nienaber 7829 NE 14th St Medina, WA 98039 Agency: Public	Please just do it!	Thank you for your comment.
C18	ALT	1	Randy Hale 2550 12th Ave. W Seattle, WA 98119 Agency: Public	Having lived in NYC I can attest to the fact that when there is excellent public transportation available, it is used. Having also lived in Southern California I can slo attest to the nightmare driving can become when more lanes are the solution to traffic. Please consider public transportation alternatives so the beautiful pacific northwest does not become LA.	The Preferred Alternative includes a substantial investment in public transportation, including a bus rapid transit system operating throughout the study area and an approximately 70 percent increase in transit service. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C19	TR	1	Cindy Colombi 1013 North 31st St Renton, WA 98056 Agency: Public	As an employee of PACCAR Parts Division I would like the option of telecommuting 1-2/days per week. Or, four ten-hour days, thus one less day on the already congested freeway. Is the coporate community decision makers working with this plan?	Telecommuting is one of the strategies included within the TDM program. Funds would be used to expand the work of the Commuter Challenge Program, which both promotes the concept and works with individual companies to develop telecommuting programs. While telecommuting has been increasing, it has been doing so at a slow rate. Telecommuting can require substantial changes in how companies do business.
C20	TR	1	George Hadley 1401 SW 172 Normandy Park 98166 Agency: Public	Article on top of Developing Concepts chart (Peyton Whitely of Seattle Times) says evening rush hour would be 250% worse in 2020 if nothing done. If the congestion would be 7 hrs in 2020 if nothing is done and 4 1/2 hrs for Alt 4 (per chart Environmental Effect Compared to Transportation Performance) does that mean congestion is about 2 1/2 hours now?	The current level of congestion on I-405 is estimated to be 7 hours. It would remain 7 hours in 2020 if nothing is done, but congestion on other freeways and arterials would increase by 1 to 2 hours.
C21	SOL	1	Robert Moyer 12207 SE 47th St Bellevue, WA 98006 Agency: Public	Comment 1. Currently south end of I-405 is short changed. North of I-90 3 lanes; south of I-90 2 lanes (ignoring car pool). Regional growth is to south and east. Need an extra lane (in any proposal) between I-90 and I-5 (south end), particularly between SR 167 and I-5. Increasing lanes between SR 167 and I-5 should be done as an interim solution, with an extra lane between SR 167 and I-90 next as an interim solution. The above comment applies to final solution as well.	The analysis for the freeway lanes included in each alternative examined the relative volumes and impacts for each segment along I-405. Additional work was performed on lane balance issues throughout the corridor during the development of the Preferred Alternative. There are several segments along I-405 that will require more or fewer lanes based upon traffic and operational characteristics. The Preferred Alternative would provide up to two additional lanes in each direction on I-405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
C21	SOL	2	Robert Moyer 12207 SE 47th St Bellevue, WA 98006 Agency: Public	Comment 2. To speed traffic, prohibit trucks from left lane between I-5 and north bottom of Kennydale Hill.	Please refer to the response to your comment C21.SOL-1.
C21	SOL	3	Robert Moyer 12207 SE 47th St Bellevue, WA 98006 Agency: Public	Comment 3. The Interim solution to eliminate collector distributor merge (southbound 405 to south 167 and north 167 to south 405 I5) should be higher priority.	Thank you for your comment regarding priorities for potential solutions.
C21	SOL	4	Robert Moyer 12207 SE 47th St Bellevue, WA 98006 Agency: Public	Comment 4. Alternative 3 should be implemented with extra lanes between I-90 and I5 south through Renton.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C22	SOL	1	George Hadley 1401 SW 172nd Normandy Park 98166 Agency: Public	I would characterize Alt One as nearly pure transit while the other 3 vary from mostly transit down to a fair amount of transit. Where is the General Purpose Lane alternative? We the public have been listening to the idea that transit will get all those others off the road for years now. We are starting to figure out that all the others thought we were going to take transit. I reality none of us want to get off the roads and be herded into buses like sheep. Please build the roads!!! I believe that the reason the governor wouldn't and won't submit his and WashDOT's plans to the public for a vote is that he (deep in his heart) realize the voters do not want huge new taxes for more transit. We want roads and until we get them we will vote against any schemes to tax us for things we don't want.	Alternative 4 would provide the greatest increase in general purpose capacity, followed by the Preferred Alternative. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C23	ALT	1	Richard Tait 3312 - 81st Place SE Mercer Island, WA 98040 Agency: Public	1. Strongly prefer Alt 3. It is by far the most cost effective way of addressing congestion. Environmental aspects are little worse than alts 2 or 3, and in many cases actually better. 2. HCT is not cost effective at all 3. BRT is useful; but cannot substitute for additional general purpose roadway 4. Increased capacity (general purpose and transit) on SR 520 is extremely important. This lake crossing for traffic to/from the area north/northeast of Bellevue is essential if congestion through Bellevue on I405 is to be controlled -- that traffic should not hanve to pass through Bbellevue in order to cross the lake. 5. A cost-effective solution to congestion should be our top priority -- not social engineering. We have grown fast, and total road capacity has fallen way behind.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
C24	SOL	1	Tom Brennan 4121 SE 3rd Pl Renton WA 98059 Agency: Public	I am in favor of more lanes. I own a small, growing company (painting contractor) in Renton, with three employees. We all are singal occupied vehicals, because we go to job sites that change location monthly or weekly. We also need to take equipment and meterials to the job sites, which makes commuter transit impractical. There for we are in favor of more lanes.	Thank you for your comment regarding lane capacity. The Preferred Alternative would provide up to two additional lanes in each direction on I-405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C24	TR	1	Tom Brennan 4121 SE 3rd Pl Renton WA 98059 Agency: Public	Are company is expanding only through word of mouth advertising. Are vehicals are not highly publisized commrcial vehicals, which were most likely not counted in any road servay.	The travel forecasts included a wide range of small to large commercial vehicles.
C25	SOL	1	Carol Nielsen 12915 NE 94th St. Kirkland, WA 98033 Agency: Public	I encourage you to consider "alternative 5." Studies show that within five years of completion, new highway lanes are filled to capacity. What will we do then? Build even more lanes? And what after that? We are following in the footsteps (or tiretracks) of Los Angeles if we solve our traffic problems by building more freeway lanes. Is this really the example we want to follow?	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
C26	SOL	1	Mike Manderscheid 16005 NE 41st Ct Redmond, WA 98052 Agency: Public	The best solution for I-405 would be an express bus system attractive enough to compete with driving: * Several major routes with service past midnight. * Minimum transfers (e.g. one route all the way from Lynnwood to Auburn/Federal Way via Bellevue) * We really need a bus route that links I-405 with Overlake/Crossroads/Eastgate. Ideally the route would be Everett-Bothell 405 Freeway stops - Totem Lake 405 Freeway stop - Overlake - Crossroads - Eastgate - Factoria - 405 - Renton - Southcenter... (All-day core route) * Make the Woodinville-Seattle portion of metro route 311 an all-day core route. Add freeway stops at Totem Lake, Houghton. * More peak-hour service	Thank you for your comment regarding express bus service. The Preferred Alternative would provide a bus rapid transit system operating in improved access HOV lanes and an approximately 70 percent increase in transit service, as well as up to two additional lanes in each direction on I-405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C27	TR	1	Marcia Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	1. If you build it, they will come.	Please see response to comment E66.SOL-1 related to induced travel.
C27	TR	2	Marcia Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	2. More lanes beget more traffic.	Please see response to comment E66.SOL-1 related to induced travel.

Code Number			Name	Comment	Response
C27	TR	3	Marcia Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	3. We need an alternative to the passenger automobile.	The range of alternatives include several choices to use of the passenger automobile.
C27	TR	4	Marcia Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	4. The road we have now is empty for a number of hours each day, horrible as rush-hour is.	I-405 is crowded for many hours during the day outside of the peak hours.
C27	COST	1	Marcia Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	5. It costs too much – we need better use of the infrastructure we already have.	Thank you for your comment regarding cost. Please see response to comment E66.SOL-1.
C27	SOL	1	Marcia Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	6. We need to have a public transport system in place on the Eastside to integrate with Regional Sound Transit if that ever gets off the ground.	The Preferred Alternative would implement a high-capacity transit system throughout the study area using bus rapid transit (BRT) and includes up to a 70 percent increase in transit service. This would integrate with existing Sound Transit Regional Express service on the eastside, as well as Sound Transit's Sounder commuter rail service and planned Link light rail service. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C27	TR	5	Marcia Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	7. There will always be a bottleneck somewhere, unless you have a dedicated roadway, such as rail – mono or bi – or a separated bus lane.	The alternatives include examination of dedicated transit (Alternatives 1, 2, 3) and roadway (Alternative 4) projects. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C27	TR	6	Marcia Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	8. We just finished a widening project on the Bellevue – North Creek portion, and now we're going to disrupt the area again with construction?	The northern portion of I-405 will likely be in the last phase of construction. Please refer to the Final EIS Section 2.2.7 for a discussion of potential scheduling for the proposed Preferred Alternative improvements.
C27	O	1	Marcia Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	9. The single-passenger car is a tremendous waste of resources steel, oil, gas, concrete, air pollution.	Thank you for your comment.

Code Number			Name	Comment	Response
C28	O	1	George Hadley 1401 SW 172nd Normandy Park 98166 Agency: Public	You need to consider how much your plans will be affected when the zombie that is Sound Transit's Light Rail project is finally declared dead! "You will have to pry my cold, dead fingers off the steering wheel"	Thank you for your comment.
C29	TR	1	George Hadley 1401 SW 172 Normandy Park 98166 Agency: Public	I think I found "THE" critical data buried in the Environmental Effects Compared to Transportation Performance chart. In the middle figure is the number of hours per day of congestion in 2020 showing no change for Alt 1 (about 7 hrs per day) down to about 4.5 hours per day for Alternative 4. This is in 2020 mind you after I-405 has been disrupted for 17 years of construction. I would like to see the plan to reduce that to ZERO! How many lanes would it take? What else to we have to do – e.g. I-605?	The Preferred Alternative and Alternatives 3 and 4 reduce traffic congestion on I-405 to levels that are below current levels, despite a 50 percent increase in travel demand in the corridor. Alternative 2 makes modest improvements in congestion along I-405. None of the alternatives reduces the congestion levels to zero.
C30	O	1	George Hadley 1401 SW 172 Normandy Park 98166 Agency: Public	Alt 5 (Sensible Solutions) has a chart quoting a Fairbanks, Maslin, Maullin & Associates, 2000) survey that asserts that 56% of voters say "Expand Transit" while only 25% say "build more roads" Have they provided the basis for that assertion (eg. exactly who was surveyed, what questions were asked (eg. exactly how the questions were phrased), etc. to WSDOT or any public agency? Is that information in the public domain? Where could it be found if public?	There is no Alternative 5 in the I-405 Corridor Program EIS. The chart quoting a Fairbanks, Maslin, Maullin & Associates (2000) survey was displayed by the Sensible Solutions for 405, not the I-405 Corridor Program, at the Draft EIS hearings held September 18-20, 2001. Fairbanks, Maslin, Maullin & Associates informed WSDOT that the referenced survey was conducted for a private entity, the "No on Initiative-745" campaign, on August 12-15, 2000; that it cannot be released without the campaign's authorization; and that the campaign is no longer in existence. (Personal telephone communication between Dave Metz, Fairbanks, Maslin, Maullin & Associates, and Christina Martinez, WSDOT, on February 5, 2002.) The co-lead agencies respectfully request that questions regarding information produced by the Sensible Solutions for 405 be directed to the Sensible Solutions group. At the time of publication of this document, Sensible Solutions for 405 can be reached via telephone at (206) 298-9338 or on the internet at http://www.405solutions.org/.
C31	ALT	1	Beverly J. Gagnier 12390 SE 41st Ln. Bellevue, WA 98006-5209 Agency: Public	I prefer more emphasis on public transportation however, being a realist, I know that won't work here. So I go for Alternative 3.	The Preferred Alternative is similar to Alternative 3 and includes substantial investments in public transportation, including a bus rapid transit system operating in improved access HOV lanes and an approximately 70 percent increase in transit service. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
C32				There is no correspondence numbered C32. This gap in the comments sequence is the result of a coding error.	

Code Number			Name	Comment	Response
C33	SOL	1	Patricia Simone 21036 196 Ave S.E Renton, WA 98058 Agency: Public	I favor Alternative 5: the Triple Win Alternative. (SS405) 1) Less that half the cost 2) Two new lanes for the most congested area (Tukwila to I-90) 3) Less than one-half the time to complete 4) Less than 1/3 of surface-water runoff and water pollution impact 5) More emphasis on reduced trips and jobs and housing within walking/bike riding of Transit Centers.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
C34	TR	1	Bob Josephson 10202 NE 30 Pl. Bellevue, WA 98004 Agency: Public	I support alternative 3. It is the only plan that can possibly work now and for the future. However, as it is designed, do not squeeze the right of way and roadways to the absolute minimum. There has to be enough room to provide for the future. Probably not more lanes but ITS equipment or columns for a PRT or mono-rail system or ----. Some reasonable level of future flexibility is a must. Don t make the I-90 mistake. I support the BRT facilities. However the operating costs need to be supported by the users. Enough RW needs to be locked up to extend/build exclusive busways for the full corridor (or the rail corridor) in the future, It just needs to be locked up now.	The Preferred Alternative is similar to Alternative 3. Both alternatives have been designed to current standards and include design concepts to minimize right-of-way acquisitions and maximize future flexibility. The Preferred Alternative does not include preservation of the Burlington Northern Santa Fe (BNSF) Railroad right-of-way; however, the I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L1	ALT	1	Charlie Hafenbrack (Chair, Board of Directors), Leslie Lloyd (President) 500 108th Ave NE, Suite 210 Bellevue WA 98004 Agency: Bellevue Downtown Association	On behalf of the Bellevue Downtown Association (BDA), we would like to offer our support for the selection of Alternative 3 as the Preferred Alternative of the I-405 Corridor Program. The BDA has been a supporter of the improvements outline in Alternative 3 for a number of months now and we a re encouraged to discover that the DEIS has shown this alternative performs even better than our initial assessment.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
				The BDA has long felt that reducing congestion on I-405 will improve our quality of life by giving us more time for things we enjoy. Of the all the alternatives, Alternative 3 is the most cost-effective and the most efficient. This is critical in a time when budgets are constrained and with the realization that I-405 is the lifeblood for the Eastside and the State's high tech economy. The BDA has had a long-standing commitment to support the creation of additional general-purpose capacity along this corridor. Although Alternative 3 does not go as far as Alternative 4 in its emphasis on GP lanes, we feel that Alternative 3 creates a balance between various model factions that we can ill afford to ignore or delay. Similarly, Alternative 3 will allow our community to continue to meet the requirements of the Growth Management Act. By developing the infrastructure needed within the Urban Growth Boundaries we can continue to encourage people to locate within the urban areas of Bellevue, especially within Downtown. At the same time Alternative 3 will go a long way in making our neighborhoods safer places to live by relieving the need for cut through traffic. Individuals who have been forced to cut through our neighborhoods to find congestion relief will find they no longer need to leave I-405 to find that relief. We applaud your efforts to date and hope that you will continue to support proposals that will provide for critical congestion relief to our region. We would also encourage you to stand strong against those individuals who have attempted to subvert the process that you have so carefully created; a process that should bring you national acclaim. Finally, we would also like to share our support for those comments made by the Bellevue Chamber of Commerce. Together the BDA and the Chamber have worked hard to find transportation solutions that provide the necessary relief for our Eastside business community. Thank you for listening to our thoughts.	

Code Number			Name	Comment	Response
L2	TR	1	Walfred J. Larson 4632 154th Pl, SE Bellevue, WA 98006 Agency: Public	I have just received a copy of the 'Citizen's Guide to the I-405 Corridor Program'. It is a very pretty brochure, and a nice presentation of many of the factors to be considered in improving traffic flor in the Seattle Metropolitan Area. However, it does absolutely nothing to REDUCE the rush hour traffic flow, OR to understand the basic parameters of that flow. You will never solve current traffic problems with this half-way approach. Ask Chicago, Los Angeles, Paris, New York, Boston, ad infinitim about their success with ever inrcreasing pavement programs. I strongly suggest you gain the ear of some smart DOT beaurocrats who understand System Engineering and start a sensible data collection/analysis/synthesis/final design program!!!!	The Preferred Alternative and Alternatives 3 and 4 reduce traffic congestion on I-405 to levels that are below current levels in 2020, despite a 50 percent increase in travel demand in the corridor. Alternative 2 makes modest improvements in congestion along I-405. None of the alternatives reduces the congestion levels to zero.
L2	TR	2	Walfred J. Larson 4632 154th Pl, SE Bellevue, WA 98006 Agency: Public	Current Situation * Morning and Afternoon Traffic (and other times) Plagued by 'The Slows'!!! * Many 'Cures' Under Consideration - Light Rail, Heavy Rail, Monorail, Buses, New Roads, Flow Improvements * All Rails & New Roads Costly and Years Off: Buses & Improve Less So * Data Base to Make Choices(s) Among Alternatives DOES NOT EXIST * Exisiting Freeway/Arterial/Road Infrastructure OK for Non-Rushhour, very inefficiently used during Rushhour!!!	The I-405 alternatives address many of the points you raise.
L2	SOL	1	Walfred J. Larson 4632 154th Pl, SE Bellevue, WA 98006 Agency: Public	Three Step Action to Solution * First develop an Area-Wide Traffic Flow Data Base (Everet to Auburn) - Survery & Record ALL Predictable Trips (by address, time LV origin, ARR destination, LV destination, ARR origin) in Computer Memory. KUD!! * Second develop a program matching four near address/time/destination trips - Heavy PR in local newspapers/major employers to encourage car pools - Arrange compatible work schedules (works @ Pentagon!) - Send matches (by 7 digit ZIP code?) directly to candidates with explanation and PR - Incentives offered... ? THIMK!!	The expanded TDM program contained in the Preferred Alternative includes measures to encourage ride sharing, and could accommodate several of your other suggestions. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
				* Third use data base to analyzed the REAL potential loads and need for new rails, buses, and roads. Defer locked in decision for a year (18 months?) Rational * Problem Unsolvable Without Reducing Cars on Road!!! (See Los Angeles, Paris, London, Mexico City, ad infinitim) * There must be a major shift in urban public attitude toward cars and public transportation * Car Pools low cost, immediate, reduce traffic and polution and gas consumption * Once established, data base can be KUD easily, and modified outcomes to users released often (quarterly during buildup, annually after) * MUST AVOID STAMPEDE BY ROAD & RAIL BUILDERS AND COIN-OPERATED POLITICIANS	
L2	O	1	Walfred J. Larson 4632 154th Pl, SE Bellevue, WA 98006 Agency: Public	PS: Since when are SUVs urban transport vehicles? Do we really have to have big parking lots around high schools so 16-18 year old children can drive to school? RAISE DRIVING AGE TO 18!!	Thank you for your comment.
L3	O	1	Renay Bennett 826 108th Ave. S.E. Bellevue, WA 98004 Agency: Public	The overwhelming majority of the people who spoke about I-405 were adamantly opposed to any new general-purpose lanes. There were only three people who spoke in favor of this proposed alternative; the President of the Eastside Chamber of Commerce, the President of the Renton Chamber of Commerce and one citizen.	Thank you for your comment.
L3	TR	1	Renay Bennett 826 108th Ave. S.E. Bellevue, WA 98004 Agency: Public	The many studies that have been done about road building have finally reached the citizens. By and large, the findings are the same; more roads bring more traffic. Adding lanes on I-405 will never fix our problems. Even with the future forecasted growth, which I believe is in error, additional lanes would be gridlocked when completed. This fact is not disputed. Billions of taxpayer dollars and we would be right where we are in 20 years. This money would be better spent on fixing chokepoints and improving transit, whatever form of transit that may take. We should be taking a long-term look at 50-100 years, not shortsighted, short-term fixes.	Additional lanes would not be gridlocked. The Preferred Alternative and Alternatives 3 and 4 reduce traffic congestion on I-405 to levels that are below current levels in 2020, despite a 50 percent increase in travel demand in the corridor. Alternative 2 makes modest improvements in congestion along I-405. None of the alternatives reduces the congestion levels to zero. The 20- to 30-year time horizon is consistent with established regional planning efforts. Every effort has been made to not preclude transportation options after that point.

Code Number			Name	Comment	Response
L3	N	1	Renay Bennett 826 108th Ave. S.E. Bellevue, WA 98004 Agency: Public	The neighborhoods surrounding I-405 will be greatly and negatively impacted. The noise from I-405 now at my home is awful. Adding 4 more lanes will make it unbearable – and for those of us uphill, noisewalls don't help at all.	As shown by the number of potentially noise-affected receptors in Table 3.2-9 of the Final EIS, traffic noise in the I-405 corridor will increase in the future under all of the alternatives, including No Action. Even if the maximum noise levels do not increase, the number of hours per day with high traffic volumes will increase. Mitigation measures including noise walls (noise reduction) will be evaluated as specific designs are developed for areas of the corridor. Noise mitigation will be provided in areas of impact where topography allows and housing density warrants their construction.
L3	AQ	1	Renay Bennett 826 108th Ave. S.E. Bellevue, WA 98004 Agency: Public	The air quality is bad now, more traffic equals more pollution. The EIS needs further refinement in its environmental analyses. These impacts are not adequately addressed.	As evaluated in detail in the EIS, the various alternatives would have a range of effects on regional air quality. In general, increased traffic delay, which may result from increases in traffic volume or decreases in capacity, results in increased pollutant emissions. Conversely, decreases in delay, whether a result of reduced traffic volumes or increased system capacity, result in decreased pollutant emissions. Detailed regional transportation models were used to compute traffic behavior over the course of the day. Pollutant emissions were calculated by roadway segment for the entire Puget Sound Region, then aggregated for reporting in the EIS. The Preferred Alternative is forecast to have the next to lowest pollutant emissions of any alternative in year 2020. See Section 3.1.4 of the Final EIS for discussion of air quality impacts of the alternatives.
L3	FATE	1	Renay Bennett 826 108th Ave. S.E. Bellevue, WA 98004 Agency: Public	There are many environmentally sensitive areas surrounding I-405. So sensitive, in fact, that we have Endangered Species Act restrictions. We cannot allow, nor should we encourage further devastation to these areas.	The EIS describes impacts to environmentally sensitive areas such as wetlands, shorelines, wildlife and fish habitat, and others. Impacts to these sensitive areas would occur not only under the action alternatives, but also under the No Action Alternative. The high current and projected rate of human population growth in the study area appears to prevent even the No Action Alternative from avoiding all impacts to sensitive areas. Also refer to response to comment L38.FATE-1 (below).

Code Number			Name	Comment	Response
L4	SOL	1	Gordon Jackie 2615 Queen Anne Ave. N Seattle, WA 98109 Agency: Public	I am writing to urge your Department to adopt Alternative 5 the so-called "Triple Win Alternative" as described in the enclosed flyer (See attachment in original correspondence). It offers so many more options at such a reduced cost that I don't think it can be ignored. It seems to be very well thought out by people who have a great deal of practical experience in the field and who are very committed to long-term solutions. WSDOT's preferred alternative has four very serious flaws which are explained on the flyer. Thank goodness logic has caught them in time. I do hope rational thought will prevail over old, failed ideas. Thank you for your attention.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. Also, a preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. The Preferred Alternative is similar to Alternative 3 - Mixed Mode Emphasis. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
L5	SOL	1	Bonnie Miller 6057 Ann Arbor NE Seattle, WA 98115 Agency: Public	As is everyone in the Puget Sound area, I am concerned about the effect of traffic congestion. Please enter my comment that I would prefer you to evaluate Alternative 5 which is more likely to get funded, gives priority to transit and has only two new lanes instead of four, and encourages trip reductions through incentives.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. Like the Sensible Solutions proposal, the Preferred Alternative includes express and bus rapid transit and provides greater emphasis for transportation demand management, trip reduction, and transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
L6	ALT	1	Wallace E. Alder 13809 S.E. 52nd Pl Bellevue, WA 98006 Agency: Westwood Homeowners Assoc	The City of Bellevue Neighborhood Networks North and South Support of Preliminary Preferred Alternative Three to Improving I-405 To the Executive Committee of the Washington State Department of Transportation's I-405 Corridor Program. As members of our neighborhood community associations who have been active in Bellevue's Neighborhood Networks North and South, let us thank you for involving our communities in the work you have done of the past two years identifying the need to reduce congestion and increase mobility on I-405. Your effort to evaluate a wide variety of options, including detailed financial analysis of the choices before us, and involve all of the communities along the corridor provides a model for future projects by WSDOT. We appreciate that you've now presented to the public four alternative plans for improving I-405. We hope that all concerned citizens take the opportunity to review the Draft Environmental Impact Statement issued by the corridor program, and evaluate the options presented to the public.	The preliminary preferred alternative was the result of a non-binding polling of the I-405 Corridor Program Executive Committee in January 2001. The preliminary preferred alternative was based on information provided in the available expertise reports and preliminary feedback from the Steering Committee and Citizens Committee. Alternative 3 - Mixed Mode Emphasis, is similar to the preliminary preferred alternative; however, there are several important differences. The preliminary preferred alternative also included: a high-capacity transit system in the central I-405 corridor; up to two additional general purpose lanes in each direction on SR 167 from I-405 south to SW 43rd Street in Renton; preservation of the Burlington Northern Santa Fe (BNSF) Railroad right-of-way for a future transportation corridor; a pedestrian trail in the BNSF right-of- way; and continued analysis of regional pricing and managed/tolled lanes.

Code Number			Name	Comment	Response
				Leaders in our Neighborhood Networks have had the opportunity to serve on the citizen committee which has worked to help produce these alternatives. They have kept us informed on the progress of the corridor program, and we remain committed to staying engaged in future efforts to see these improvements become realities. Based on our review of the work you have done, we lend our support to Alternative Three, the Preliminary Preferred Alternative. We believe it provides the best mix of increased lane capacity and multi-modal improvements for making the I-405 corridor safer, more environmentally friendly and less congested. Families living along the I-405 corridor – whether they use its roads for commuting, running errands or simply have to deal with the cut-through traffic that clogs our neighborhood streets – are well aware of the need to start work on the comprehensive plan to fix the problems we face. We cannot afford to let this opportunity to improve this corridor pass us by. In conclusion, we appreciate all the work done by the hundreds of citizens and elected leaders who have been engaged in this process. We sincerely hope that you will validate that work by approving Alternative Three as the Preferred Alternative when you vote on this subject in October.	The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L7	SOL	1	Dennis R. Neuzil 2307 – 94th Ave NE Bellevue, Washington 98004 Agency: Public	I want to thank the Department and its consultants for the extensive studies performed for several alternatives for the Corridor Program and an excellent public outreach effort throughout the course of the study. Nevertheless I believe that two additional alternatives warrant major study by the project team and so recommend. Any comprehensive program of corridor transportation improvements will be a huge and costly undertaking with many potential impacts regardless which alternative is selected for implementation. This is particularly so in the case of the very high-cost Alternative 3 – the DEIS's preferred alternative and its heavy emphasis on the addition of four general purpose traffic lanes (two in each direction), which would undesirably cater to and promote an exceedingly high level of single-occupancy vehicle travel.	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3 - Mixed Mode Emphasis. Bus rapid transit operating in improved access HOV lanes is evaluated and proposed as part of Alternative 3 and the Preferred Alternative. The capacity added to I-405 would help to reduce congestion and improve mobility across all transportation modes. There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Also, please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
				Accordingly, I urge the program team to carefully and thoroughly develop and assess the alternative – called by some Alternative 5 and proposed by Sensible Solutions at the Bellevue hearing. Among major capital elements of that alternative are: 1. The addition of one general purpose or managed traffic lane in each direction south of I-90 2. Acquisition and development of the conversion of the BNSF rail line right-of-way for frequent, all-day rapid transit or express bus service. I recommend that study of this facility also address its northward extension to I-5 via the SR-527 or I-405 corridor.	
L7	SOL	2	Dennis R. Neuzil 2307 – 94th Ave NE Bellevue, Washington 98004 Agency: Public	The second new alternative which I recommend be studied is a major variation on Alternative 3 and which adds new traffic lanes in the following manner: 1. A new general purpose lane in each direction south of I-90 only. 2, A new managed lane in each direction for the entire length of the project. This lane would be placed adjacent to the existing HOV lane and both lanes set off from the general purpose lanes by a flush or raised separator strip, with limited access via HOV/managed-lane-only ramps and a limited number of mainline access points from the general purpose roadway. This managed lane-pair (one pair of lanes in each direction) would serve HOV's and possibly a carefully limited number of SOV's (and possibly high-performance commercial vehicles which do not impede the flow of automobiles in the managed lane-pair) which pay a high toll fee to help underwrite the cost of the project.	Additional lanes on I-405 south of I-90 are considered as part of the Preferred Alternative and Alternatives 2, 3, and 4. The managed lane concept is being examined along the length of I-405 as part of Alternative 4. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
L8	ALT	1	Suzette Cook 300 Rainier Ave. N. Renton, WA 98055 Agency: Greater Renton Chamber of Commerce	The Greater Renton Chamber of Commerce Board of Directors met on September 20 to discuss the EIS and proposed alternative solutions. It unanimously endorsed Alternative #3 with the emphasis on mixed mode: a Bus Rapid Transit system with expanded bus service, two additional general-purpose traffic lanes each direction on I-405, and widening SR-167. While the Board of Directors supports Alternative #3, the Board wishes to make clear its opposition to use of the Burlington Northern Santa Fe right-of-way for preservation of future transportation opportunities. The Burlington Northern Santa Fe line runs through the middle of downtown Renton and through the Kennydale and south Renton residential neighborhoods, affecting such regional recreational amenities as Gene Coulon Park and the Lake Washington trail system. Use of this right-of-way would be in conflict with the Corridor Program's stated goals: l Enhance livability for communities within the corridor; and l Seek opportunities to enhance environmental quality.	The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L9	SOL	1	Susan Huenefeld 1002 111th Place S.E. Bellevue, WA 98004 Agency: Public	I live at the intersection of S.E. 8th and 112th Ave. S.E. We have constant noise from 405. Residents from my neighborhood have repeatedly requested that the noise be mitigated, but nothing has been done and the noise levels continue to rise. Adding more lanes to 405 will only exacerbate the noise pollution problem. Mass transit is a better way to deal with the gridlock on 405. It costs less both financially and environmentally.	Please refer to the response to comment L3.N-1. The Preferred Alternative would provide a bus rapid transit system operating in improved access HOV lanes and an approximately 70 percent increase in transit service, as well as up to two additional lanes in each direction on I-405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L10	ENR	1	Virginia Gunby 2540 N.E. 90th St Seattle, WA 98115 Agency: Public	Currently 43% of the oil for the U.S. is supplied from within our country. The balance, 57%, is from foreign sources, one third from the middle-east. Our U.S. consumption is growing at an annual rate of 5%, which is unsustainable and dangerous to our country's economy and international security.	Estimated energy consumption associated with the different alternatives is described in Section 3.3 of the Draft EIS.
L10	TR	1	Virginia Gunby 2540 N.E. 90th St Seattle, WA 98115 Agency: Public	We can conserve and reduce the growth of oil consumption through planning and building facilities that will move people. A plan for using vanpools, carpools, transit services, and concentrating eastside development into mixed-use urban centers and neighborhoods, and living closer to where we work, is not given consideration in this DEIS.	The TDM element included in each alternative includes substantial increases in vanpools throughout the study area, plus a major element to try and effect how land is developed, including incentives to encourage jobs/housing balance. The Preferred Alternative and Alternatives 1 through 3 include substantial increases in transit services. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.

Code Number			Name	Comment	Response
L10	ROW	1	Virginia Gunby 2540 N.E. 90th St Seattle, WA 98115 Agency: Public	There are fatal flaw issues relating to recommending a "Preferred Alternative" at the "streamlined" Programmatic DEIS level. It is premature. There needs to be much more technical analysis comparing the various alternatives in detail before conclusions or preferred alternatives can be chosen to be implemented after the project level EIS process. The eastside community needs to have the details of the estimated $1 Billion dollar project costs for displaced housing and businesses, of between 260 to 480 estimated units, that the various alternatives will impact or take for proposed I-405 revisions.	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. This EIS examines impacts at a programmatic corridor level so that decision-makers can choose the most acceptable alternative that meets the program purpose and need. If a decision and analysis were to be made only at the project level, there might not be adequate flexibility for large-scale adjustments. The displacements are estimates that provide a good basis for comparison among the alternatives. At the project level, details at site-specific locations will become more meaningful. Because these projects will occur over a relatively long time frame, and because conditions may change at site-specific locations, doing a more detailed analysis at the project level is most prudent.
L10	LU	1	Virginia Gunby 2540 N.E. 90th St Seattle, WA 98115 Agency: Public	Another major concern is that the Puget Sound Regional Council's travel and land use model used for this study is obsolete in comparison with current new models used in Oregon and California regions. An updated model incorporating the effects of updated local Growth Management Plans, Destination 2030 policies plus increased HOV/transit accessibility on alternative land development patterns needs to be incorporated into a Supplemental Programmatic I-405 DEIS. There are also significant discrepancies between Destination 2030 Performance Measures, Table 3.32-9 on page 3.32-45 and the proposed I-405 DEIS alternatives, that need to be resolved.	The Puget Sound Regional Council (PSRC) model was chosen for land use analysis for the following reasons: PSRC is recognized by the Federal Highway Administration as the Regional Metropolitan Planning Organization and is charged with transportation and land use consistency for federal funding through the adoption of the Metropolitan Transportation Plan (MTP). The local and regional jurisdictions have used this regionally adopted model for the identification and analysis of projected growth and population allocations for purposes of compliance with the Growth Management Act (GMA). The regionally adopted model is widely considered technically valid and any future adjustments to the model would be reflected in the MTP. This model has been the basis of land use analysis for the regionally adopted *VISION 2020* and *Destination 2030,* including policy guidance for growth in the four-county area (King, Kitsap, Pierce, and Snohomish). The PSRC model is the FHWA and regionally accepted model. PSRC is currently evaluating that model as part of its regional updates. It is assumed the commenter is referring to Table 3.23-9 on page 3.23-45 of the Draft EIS. Although at first glance it may appear that there is a discrepancy in Table 3.23-9, it simply provides a comparison of the region-wide versus study area performance measures. The study area covers only 21 percent of the regional population and provides 24 percent of the region trips.

Code Number			Name	Comment	Response
L10	TR	2	Virginia Gunby 2540 N.E. 90th St Seattle, WA 98115 Agency: Public	California's Governor Gray Davis In August 2001 announced that the primacy of the automobile is over, underscoring a fundamental shift in transportation policy. But will there be a big shift in travel and emphasis from "automobility" to accessibility of community and business, and sustainability and livability based upon adopted local and regional growth management plans? Not if the preferred alternative is built. Transit, carpools, bus rapid transit and pedestrian friendly alternatives to the auto can only become more attractive if driving is made more expensive through tolls, parking costs and gasoline taxes. I propose that any rebuilt I-405 be a demonstration project to test new methods of transportation funding that will help to manage the corridor for optimum performance. Early research on the Translake corridor indicated significant reductions in congestion and long-term economic benefits by using a marketing principle that highway users pay for what they use, (adjusting the tolls by time of day) to manage the corridor.	The Preferred Alternative includes an aggressive TDM program aimed at maximizing incentives for carpooling, vanpooling, and transit use. The I-405 Corridor Program Executive Committee also recommended that pricing strategies be further examined at the regional level. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L10	COST	1	Virginia Gunby 2540 N.E. 90th St Seattle, WA 98115 Agency: Public	All of the proposed and final programmatic alternatives should be realistically priced at the projected estimated cost at the time of expenditure, not 2000 dollars. The I-405 proposals are the most expensive transportation projects ever recommended in Washington State. The Committees associated with any future projects must be involved in the question of how to pay for whatever is built. There must be an equitable, long-term source of revenue for construction and operations, with the users paying a greater share of the cost.	Cost estimates were originally developed in year 2000 dollars because the year of expenditure and associated future construction price indices are unknown. These have been updated to year 2002 dollars in the Final EIS.
L10	SOL	1	Virginia Gunby 2540 N.E. 90th St Seattle, WA 98115 Agency: Public	I favor a new safe, multimodal alternative with a minimal expansion of I-405 for SOV's. Build one HOV 3+ lane each way. Convert a general purpose lane to a tolled HOV2+ SOV lane in each direction, and distance-based transit fares, particularly on express buses. I-405's TDM component should not be the same programs and costs for each TDM alternative. Corridor TDM alternatives must give more emphasis to providing for a range of trip reduction improvements coordinated with the I-90 and SR 520 inter-local Corridor Management Agreements, that are being developed. It is a waste of effort to have TDM trip reduction programs as a component of any alternative that has a major expansion of SOV capacity, and TDM plans and funding should be increased for smaller I-405 alternatives.	Thank you for your comments regarding addition of capacity and TDM programs in the I-405 corridor. The Preferred Alternative is a multimodal alternative with bus rapid transit system operating in improved access HOV lanes, an approximately 70 percent increase in transit service, and an expanded TDM program, as well as up to two additional lanes in each direction on I-405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
				We must go beyond a Commute Trip Reduction and TDM programs approach to integrate comprehensive plans with the fragmented transportation plans. It is very positive step that you have included a TDM I-405 Corridor Management Agreement in the package. This must be developed with public and private involvement and coordination, and include long term monitoring to assure that the programs and agreements are implemented.	
L10	TR	3	Virginia Gunby 2540 N.E. 90th St Seattle, WA 98115 Agency: Public	I-405's TDM component should not be the same programs and costs for each TDM alternative. Corridor TDM alternatives must give more emphasis to providing for a range of trip reduction improvements coordinated with the I-90 and SR 520 inter-local Corridor Management Agreements, that are being developed. It is a waste of effort to have TDM trip reduction programs as a component of any alternative that has a major expansion of SOV capacity, and TDM plans and funding should be increased for smaller I-405 alternatives. We must go beyond a Commute Trip Reduction and TDM programs approach to integrate comprehensive plans with the fragmented transportation plans.	While the effectiveness of TDM would probably vary by alternative, the TDM program included in the Preferred Alternative includes the most effective TDM strategies documented in the Final EIS.
L10	O	1	Virginia Gunby 2540 N.E. 90th St Seattle, WA 98115 Agency: Public	The recent New York attack and disaster that has followed provides another lesson why our current transportation system that relies on highways and airplaces is very vulnerable and needs to be more balanced and to move people.	Thank you for your comment.
L10	TR	4	Virginia Gunby 2540 N.E. 90th St Seattle, WA 98115 Agency: Public	The DEIS I-405 Preferred Alternative encourages continued expansion of single-occupant vehicle use and congestion. Any expanded SOV capacity will be filled five years after opening. Revise the study's mobility measures to include an "equitable accessibility" measure of household income. Massive public subsidies for highway infrastructure have distorted the transportation market place. They have prevented us from reflecting the true public costs and who wins and who loses! Let's not repeat the mistakes of the past, resulting in sprawl and highway congestion, that fosters costly, low density communities with few choices for housing, lifestyle or travel.	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Refer to the response to comment E66.SOL-1 for a discussion of effects of expanded capacity on travel demand. The Preferred Alternative includes a balanced program that increases transit and carpool/vanpool use, in addition to providing expanded general traffic capacity. Like the Sensible Solutions proposal, the Preferred Alternative also provides greater emphasis for transportation demand management, trip reduction, and transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response

L11	O	1	Margaret Cary Tunks submitted by B. Zepeda
			4201 Via Marina #152
			Marina Del Rey, CA 90292
			Agency: Public
				SR520:
				Governor Locke has said that $4 billion is needed for more motor vehicles on a bigger Lake Washington SR 520 bridge, but he did not give any information about the addition.
				But the project is not valid because there is no room for more vehicle traffic from more SR 520 lanes from the ramps at montlake/University and at Union Bay, and I-5 is always at gridlock where SR 520 is connected.
				Governor Locke and the Legislature will not be able to build anything on SR 520.
				I-90
				The Washington State Department of Transportation, (The WSDOT), announced in 1999 than they intended to "reconfigure" existing I-90:
				-- Three lanes on the pre-war bridge to be configured into four lanes.
				-- Five lanes on the new bridge to be reconfigured to six lanes.
				But there are two important factors the negate reconfiguration of I-90:
				>>> I-90 ends in downtown Seattle, (on the east side of the athletic stadium at Dearborn and Fifth Avenue). with a ramp to Fourth Avenue, but there is no room for more motor vehicles to come into Seattle.
				>>> The Federal Department of Transportation has ruled that reconfiguration of lanes on I-90 only 11 feet wide will not be allowed because they are not safe – there would be too many accidents on them.
				Rail transit does not need 12 foot wide lanes on I-90!
				Washington State Secretary of Transportation, Bill Bulley, said at his 1979 Lathan case sworn deposition that the eight lanes of I-90 could be reconfigured to ten lanes.
				AuBrey Davis was the Mercer Island Mayor when the 1971 I-90 design was federally approved; he was the Metro Transit Committee Chairman from 1972 to 1978; he is now in his second term on the Washington State Department of Transportation Commission. In his sworn deposition for the 1979 Lathan I-90 case, Aubrey Davis set the course for future transportation on I-90: "Rail would take less transit than the middle lanes are now taking because, lacking cars, they would not need shoulders, and by moving barriers, it would be possible to get another lane for carpools and Mercer Island, however they wanted to adjust it.
					The I-405 Corridor Program Alternative 1 - HCT/TDM Emphasis, and Alternative 2 - Mixed Mode with HCT/Transit Emphasis, both contain a physically separated, fixed-guideway, high-capacity transit system potentially using some form of rail technology as described on pages 2-1 through 2-7 of the I-405 Corridor Program Draft EIS. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
				All future transportation of more people and goods into and from greater Seattle will depend on rail transit on I-90 to and from downtown Seattle across Mercer Island, to Bellevue, and on the I-90 right-of-way to Issaquah and beyond (See figure in original correpondence). Stations will be built at intervals along the railroad, then population will concentrate in villages, then towns, then cities will be built at the stations, and further urban sprawl on the east side of Lake Washington will stop. The Law: The WSDOT Trans-Lake Washington Study has been financed by both state and federal funds, so the WSDOT must meet the requirements of the Federal and State Environmental Protection Acts, [NEPA and SEPA}. for capital-funded projects: the WSDOT must prepare the State and Federal Environmental Impact Statement, (EIS), recording the social, economic, and environmental (SEE) effects of the projects and of all the alternatives. I-90 and SR 520 are in the same transportation corridor, less than 4 miles apart, and all trans-Lake Washington motor vehicle and rail alternatives must be considered and reported in the Environmental Impact Statement. I-405: The people on the east side of Lake Washington are clamoring for more highway lanes on I-405, and Governor Locke told the 2001 Legislature that he wanted -$7 billion for two more lanes on both sides of 30 miles of existing north/south 4-lane I-405. The WSDOT I-405 Corridor Program has announced that they have finished their Draft Environmental Impact Statement for four alternatives, there would be three public hearings, and that the 45-day comment period would end on October 8, 2001.	

Code Number			Name	Comment	Response
				The four alternatives reported in the DEIS are on the Internet http://www.wsdot.wa.gov/I-405: All of the alternatives list transit, but there is no listing of rail transit – all transit listed in the DEIS is bus transit. The WSDOT has, in no way, considered transit the good old existing Burlington Northern Railroad, the only and the most absolutely wonderful alternative close to I-405 – rail transit on the Burlington Northern Railroad from south of Renton, north, (between the east shore of Lake Washington and I-405), to I-90, on north (close to I-405) to Kirkland; and northeast to Woodinville and beyond. [In summer there is a dinner train from Renton to the Columbia winery near Woodinville – the train cars and the engine are 1950's very heavy stuff, running well on the existing track}.. The Washington State Department of Transportation has spent billions of dollars since 1996 in 1975-era studies of obsolete projects for more motor vehicles: added lanes on trans-Lake Washington I-90 and SR 520; added motor vehicle lanes on 30 miles of I-405. All transportation decisions for the future must be made for the years 2020, 2040, and beyond, and the future of transportation in greater Seattle will be made by the transportation of people and goods on rail transit. I wrote two important documents about Seattle transportation: >> "Critique of the I-90 Environmental Impact Statement", 1976, 284 pages.; (sent to Washington State Department of Highways and various federal offices in Washington, D.C.) >> "Seattle Citizens Against Freeways, Fighting Fiercely and Winning Sometimes", 1996 and 1999 editions with excellent drawings by Dave Lefebvre.	
L12	ALT	1	John R. Valaas P.O. Box 674 Medina, WA 98039 Agency: Public	I am writing to express my support for Alternative 3 as the Preferred Alternative of the I-405 Corridor Program. This region has under-invested in its transportation infrastructure for too long. It is now time to address the problem. Alternative 3 is a big step in that direction.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
L13	ALT	1	Stephanie Adams 17720 SE Petrovitsky Rd. Renton, WA 98058 Agency: Public	In accordance with the call for comments regarding I-405, I elect alternative number two. I think alternative two best emphasizes the purposes of the Washington State Department of Transportation to reduce traffic congestion and improve mobility along a 30-mile stretch of I-405. With our current growth and the projected growth of our Puget Sound region over the next many years, it is clear that we need a safe reliable, and cost effective system that will carry us through the 21st century. I have been a life long resident of the Puget Sound and am a proponent of high-capacity transit, more specifically light rail. At the same time, however, I realize people may be reluctant to give up their cars, Unlike alternatives one, three, and four, alternative two compromises between light rail/bus and expanding frequently traveled roads for driving. This alternative is the best of both worlds. The traffic in our region rates among the worst in the nation, and I am optimistic that a high-capacity transit system would begin to help remedy this problem. Having traveled throughout the United States and Europe, I always use the subway or light rail in the cities that have them rather than trying to drive and park. Most large cities in the United States have high-capacity transit systems: Portland, Chicago, New York, San Francisco, and others. Notice these cities do not rank as high as Seattle on the worst traffic list; three of these four cities are larger than Seattle. The light rail system in Portland, The Max, should be our model. In order for alternative two to be successful the transit system would need to be one that is efficient, quick, timely, and comfortable. It must be all of these things and more in order to get as many people out of their cars as possible. This will best facilitate the building of only one lane in each direction of I-405. Alternative two also provides for a one-lane road expansion in each direction of I-405 as well as fixing the bottleneck problems. Having spent countless hours sitting in traffic along I-405 and at the SR-167 and I-90 bottlenecks, I think it is necessary that I-405 expand by one lane in each direction. Regardless of how good our high-capacity system will be there will be times in which one will need to drive, and therefore, it is imperative that we improve the roadways and bottlenecks. Future traffic, not to mention current traffic, merits an expansion of lanes on I-405 while at the same time building a high-capacity transit system that can move many people quickly.	The Preferred Alternative does not include fixed-guideway high-capacity transit. Instead, it would provide bus rapid transit system operating in improved access HOV lanes and an approximately 70 percent increase in transit service, as well as up to two additional lanes in each direction on I-405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
				As for the benefits, and costs, again I think alternative number two comes out the favorite. Although alternative two will not reduce congestion on I-405 as much as alternatives three or four, it will free up other roads linked with I-405 much more than those alternatives. Despite alternatives three and four improving mobility a little more than alternative two, building more roads rather than using high-capacity transit ultimately will result in more automobile deaths. As for the cost of the alternatives, number two is second in cost only to alternative number four; but, alternative number two is a good compromise between those who want light rail and those who want to keep driving their cars, and it provides more improvements than the lower cost alternatives. At this stage of the game in which we are so far behind, I think we should spend as much as necessary to get a system that will not be outdated or overcrowded before it is finished. Concerning the environmental impacts, air quality will not fluctuate substantially between any of the alternatives. Although alternative number two rates higher in noise pollution than alternative zero or one, it rates much lower than alternative three or four. As for riparian encroachments, it does rate at a more harmful level than the other alternatives, but alternative number two does rate less than alternatives three and four in use of wetlands. Despite alternative two rating fairly high in new paved area and in decrease of water recharge area, alternative four rates higher in both of these categories with alternative three just slightly behind alternative two. Although alternative number two may not come out the clear winner in terms of less environmental encroachments than the other alternatives, it is not as drastic a measure as alternative one or four that really allow for no compromise between light rail and roads.	

Code Number			Name	Comment	Response
				The alternative two map illustrates that the high-capacity system would extend as far as SeaTac Airport whereas alternatives three and four would not. I travel to the airport on a weekly basis and can attest to the much-needed high-capacity system in that area. Parking is at such a minimum at the airport, with no extra land available for more parking lots. SeaTac is growing, a third runway is currently being built; this means more people arriving and leaving. For these reasons alone alternative number two is a good solution. I cannot tell you the amount of times I have heard people, at SeaTac Airport commenting on our terrible transit system. As I have stated I have traveled extensively, and I cannot recall a city that has such an unfriendly transportation system as ours. I-405 is our second largest freeway in the Puget Sound area and it needs to be improved. Maybe if we build a great high-capacity transit system it will catch on in other parts of this region; it could extend to Seattle and Tacoma. I, for one, would be thrilled if alternative two were approved and built. I spend a lot of time in my car, and I would love to give it up to travel by light rail where available. Ultimately over time, number two will prove to be the preeminent alternative and will best propel us through the 21st century.	
L14	ALT	1	Donna Zahner 827 108th Ave SE Bellevue, WA 98004 Agency: Public	I am opposed to the "Alternative 3" as a solution to our traffic problems. This alternative does not resolve the traffic situation. As a Bellevue resident, I will face adverse effects from the increased noise, pollution, traffic and inconvenience. Furthermore, it is costly ($8 billion) and will take an unusual amount of time to construct (18-years!). And it will be out of date 2 years after completion! This is a waste of time and money and is NO solution. Please look for other alternatives.	Your concern was presented to the decisionmakers; however, the Preferred Alternative advanced to the Final EIS is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
L15	SOL	1	Peter Rimbos 19711 241st Ave SE Maple Valley Agency: Public	As a user of I-405 I encourage evaluation of other solutions over the preferred alternative. We know from current and past experience in other communities that we cannot grow our way out of traffic congestion. The only long-term solution – short of population depression – is to implement a variety of forms of mass transit. (1) It is the most efficient and economical way ($ per lane mile) to move masses of people; (2) It doesn't require massive long-term investments in roads; and (3) It allows growth to be accommodated. Critics of mass transit say, "People don't use it." Why not endeavor to resolve this dilemma, instead of ignoring mass transit as a long-term solution. Some of the reasons people give for not using mass transit include: "Not convenient." "Doesn't go where I want to go." "Not enough buses, trains, etc." Why not fix these problems first by investing in more buses, trains, monorail, light rail, HOV lanes, rights of way, trip-reduction incentives, vanpools, carpools, etc. before sealing our fate by overbuilding roads and acerbating traffic congestion by encouraging even more SOVs. In addition, I encourage solutions be implemented to eliminate the 3 chief bottlenecks on I-405: the interchanges at Rt 167, I-90, and Rt. 520. For example, when I travel south on I-405 approaching the Rt. 167 interchange, I notice backups that go for 2, 5, and even 7 miles – all because of the exit ramp from southbound I-405 and the entrance ramps to Rt 167. Fix these types of problems at the three key interchanges and traffic congestion will be noticeably reduced. Please consider my concerns about the preferred alternative and evaluate more reasonable, less expensive, near-term, and doable solutions: (1) mass transit and (2) interchange mitigation – solutions that will not further encourage sprawl into our rural areas. In addition, I believe Alternative #5 is a real solution that should be given serious consideration and evaluation.	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3 - Mixed Mode Emphasis. Bus rapid transit in the I-405 corridor is evaluated and proposed as part of Alternative 3 and the Preferred Alternative. For your information, the Elevated Transportation Company recently published estimated monorail construction costs in the City of Seattle. These costs ranged from $69 to $124 million per mile for a 14-mile elevated system. These costs were similar to the fixed-guideway transit system costs evaluated in Alternatives 1 and 2 in the Draft EIS.
L16	O	1	J. Thomas Bernard 8150 304th Ave SE Preston, Washington 98050 Agency: Public	Our I-90/Preston Industrial Park is located at I-90 Exit 22, on I-90, east of Issaquah. Businesses and employees working here depend on having a good transportation system in the Puget Sound region. The section of I-405 between Tukwila and Lynnwood is especially important to us, as well as the entire Eastside. I-405 also serves as an important traffic reliever for I-5, between Bothell and Tukwila.	Thank you for your comment.

Code Number			Name	Comment	Response
L16	PPA	1	J. Thomas Bernard 8150 304th Ave SE Preston, Washington 98050 Agency: Public	The "Preliminary Preferred Alternative", or Alternative 3 program is the best plan to add the most traffic capacity in the I-405, corridor between Tukwila and Lynnwood. Adding two general traffic lanes in each direction, as well as expanded capacity for the express and local bus system, and fixing interchange bottlenecks are needed now so that our business can operate efficiently and employees throughout the region have a better quality of life – spending less time in congested traffic. Present traffic congestion must be eliminated, and future traffic needs must be met. Please approve the "Preliminary Preferred Alternative", the Alternative 3 program, at the Executive Committee meeting on November 15. This program will improve water quality for fish (cleaner stormwater), will help improve our air quality (faster traffic pollutes less), and will improve the regional business climate and save personal time for employees, throughout the region. We greatly need Alternative 3.	Alternative 3 - Mixed Mode Emphasis, is similar to the preliminary preferred alternative; however, there are several important differences. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a description of the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L17	TR	1	Charles B. Liekweg 1745 114th Ave. SE Bellevue, WA 98004-2005 Agency: AAA Washington	Interstate 405 is a vital corridor in the Puget Sound region's transportation system, and the dramatic increase in traffic congestion along the corridor has serious implications for the economic and lifestyle future of Washington State. This corridor is operating at (and in some places above) capacity, leaving little margin for error. Today even a minor traffic incident can result in major gridlock. Congested roads rob people of time with their families, diminish safety and increase pollution. Transportation must be an integral component of planning for community and regional growth. During the past two years, AAA Washington has been pleased to participate on Citizens Committee that helped to develop alternatives to address the stated goals of the I-405 program: to reduce congestion and improve mobility and enhance traffic safety along this vital corridor.	Thank you for your comment.

Code Number			Name	Comment	Response
L17	ALT	1	Charles B. Liekweg 1745 114th Ave. SE Bellevue, WA 98004-2005 Agency: AAA Washington	Through an extensive, open and collaborative process, the committees (citizen, steering and executive) charged with identifying a solution to address the needs of the region concluded that the best answer was actually an amalgam of transportation choices. This solution, now known as Alternative 3, was demonstrated through the DEIS process as the alternative which best meets the program's stated goals of reducing congestion and improving mobility. AAA Washington would like to go on record in support of the Preliminary Preferred Alternative and encourages the I-405 Corridor Executive Committee to move forward with this solution. By adding two new general traffic lanes in each direction on I-405, the solution addresses capacity needs for persons who choose to drive personal vehicles. By expanding the express and local bus system and focusing on a Bus Rapid Transit technology, the solution provides additional choices for persons who use public transportation. By enhancing transportation demand management programs for the corridor, the solution provides added incentives to businesses and employees to find ways to best use the system we will have. There is no simple solution to our congestion problems, because this region is diverse and our citizens value their freedom to choose where and how they travel. Flexibility is key to any successful congestion mitigation strategy. The mix of roadway, transit and non-motorized improvements identified in the Preliminary Preferred Alternative (Alternative 3) addresses individual's needs to choose a mode of transportation that best suits their lifestyle. It also offers the region an opportunity to reduce the congestion and improve mobility to address the needs of businesses to move employees, products and provide services now an in the future. Thank you for your consideration of our comments.	The Preferred Alternative and Alternative 3 - Mixed Mode Emphasis, are similar to the preliminary preferred alternative; however, there are several important differences. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a description of the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
L18	ALT	1	Joan Wallace Betty Nokes 10500 NE 8th Street, Suite 212 Bellevue, WA 98004 Agency: Bellevue Chamber of Commerce	On behalf of the Board of Directors for the Bellevue Chamber of Commerce, we would like to express our support for the selection of Alternative 3 as Preferred Alternative of the 1-405 Corridor Program. In April of this year, the Chamber Board submitted its support for Alternative 3 as the preliminary preferred alternative as you were working on the Draft Environmental Impact Statement (DEIS). After seeing the results of the DEIS we continue to support this alternative and are even more encouraged to see how well Alternative 3 compares to the others. Contrary to what a limited number of individuals might imply, Alternative 3 is the best multi-modal approach to solving our region's congestion problems and provides the best balance between the growth management and environmental objectives of our region. We are sure that we do not need to emphasize that our region's economic future depends on improving I-405. I-405 has realized nearly a 200 percent increase in traffic congestion over the last 10 years. Cost of delays, livability and air quality degradation are obvious impacts. I-405 (along with SR 520) lead the region in daily hours of congestion with over 50% of the entire day in gridlock. It shouldn't have been a surprise that the Texas Transportation Institute stated that $930 per person a year is wasted on congestion. We can ill afford plans that do not directly minimize that amount of waste. The DEIS makes it abundantly clear that Alternative 3 would be the most cost effective and efficient alternative.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
				In the weeks ahead you may be pressured by those who do not like the results of the DEIS and who are attempting to gain support for last minute alterations of the process. The I-405 Corridor Program has been a model which we believe deserves national attention for its efforts in building public consensus. We strongly encourage you to resist the efforts of these individuals. The model wars must end and we must move on and realize the improvements to the environment, congestion and our quality of life that Alternative 3 promises. Finally, we would like to state that we fully support the comments made by the Bellevue Downtown Association in regards to this issue and have worked closely with that organization in developing our joint support. Thank you in advance for the consideration of our concerns and for your hard work on this matter. We are vitally interested in your success and fully anticipate assisting you when we begin to try and find the funds necessary to implement the findings of the I-405 Major Investment Study.	
L19	TR	1	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 Agency: Public	1. The 20-year planning horizon seems far too short, especially since it appears to include the construction period itself. To trade years of traffic disruption due to construction, and billions of dollars, for only a decade or so of somewhat improved traffic congestion is not a good deal.	The Draft EIS examines potential effects to 2030 or beyond for some transportation measures and cumulative and secondary effects, although most of the detailed analyses are focused on a 20-year horizon. The Draft EIS also addresses the degree to which each alternative provides solutions that are sustainable into the future.
L19	TR	2	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 Agency: Public	2. The transit components of all the Alternatives are presented in an extremely vague way, and appear not to have been thought through very well at all. "Increased bus service" and "HCT" are just general descriptions, not plans. The maps don't show which purple lines are intended to be HCT and which purple lines are supposed to represent bus service. Absolutely no indication is given of where the train stations, bus stops, and park-and-ride lots would go - let alone where the bus routes would begin and end, or how frequent the service would be on any given route.	The WSDOT has been working extensively with transit service providers to develop a refined transit service plan for each of the alternatives studied in the Draft EIS. For travel forecasting purposes, initial assumptions were made as to where train stations, bus stops, and park-and-ride lots would go; however, actual locations will be identified as more detailed project-level planning occurs and an implementation plan is developed for the Preferred Alternative.

Code Number			Name	Comment	Response
L19	TR	3	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 Agency: Public	3. No data were presented to address how effective the transit components would be in attracting peak-hour commuters (and thus reducing congestion). The least one would need, it seems to me, would be a map showing the locations of the jobs that people currently commute to using I-405. But we should go beyond that, and make a serious effort to find out what our commuting patterns in the I-405 corridor really are. How many people commute from Renton to the Boeing plant in Everett? How many commute from Mill Creek to downtown Bellevue? And so on. Two other important things to find out are how dynamic our commuting patterns are (how often do people change jobs and/or move?), and how willing people are to move because of changes in their commutes. To fail to collect all this information because it would be "too expensive" to run such a big survey would be minding the pennies while the dollars fly unnoticed out the window.	Both daily and peak-period transit ridership were estimated as part of the I-405 corridor alternatives analysis. The forecasts that were developed were based on official land use forecasts provided by the Puget Sound Regional Council that include the forecasted location of jobs and households in the study area and region in 2020. The travel forecasting model is validated using household surveys, travel diaries, traffic and transit counts, and other data collected to capture travel patterns in the base (existing conditions) year. The model then forecasts how these travel patterns may change in the future due to such variables as changes in land use patterns, levels of congestion, and the relative costs of alternative modes. We thus have a relatively good idea of how people are commuting between various parts of the study area and the region today. Using the validated travel models, we can forecast how this might change in the future. Alternatives were developed based upon an analysis of these travel patterns now and in the future.
L19	TR	4	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 Agency: Public	4. I am very worried by the claims I am hearing that adding freeway capacity rarely provides more than very short-term relief. If it is true that new lanes added to big-city freeways fill right up in just a few years or even months, pushing commute times right back up to what they were before, then adding lanes to I-405 would clearly not be in the public interest. We need to be very sure we understand the causes of this phenomenon, and very sure that we have taken the necessary steps to ensure that this does not happen on I-405. Otherwise, we are just throwing money away, or spending it to benefit newcomers moving in, while gaining nothing from it ourselves. A lot of people are already angry about subsidies to newgrowth.	Please see response to comment E66.SOL-1 related to induced travel.
L19	TR	5	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 Agency: Public	5. The Project Team seems to be dominated by highway expertise, with transit expertise underrepresented. The Executive Committee should demand that a better job be done developing, explaining, and justifying the transit components of all the Alternatives.	The project team and committees cover a wide range of transit and highway expertise. They include transit agencies, local agency elected officials, citizens, and environmental resource agencies. Within the project team, persons with specific modal expertise were assigned to develop and analyze those portions of the plan. For example, the transit component was jointly developed with Sound Transit, King County, Community Transit, and a transit consultant.
L19	O	1	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 Agency: Public	6. On a general note, I think this project has just as much potential to damage - or restore - public trust in government as Sound Transit's light rail project.	Thank you for your comment.

Code Number			Name	Comment	Response
L19	O	2	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 Agency: Public	P.S. - I grew up in and near New York City, and also have some familiarity with Washington, D.C.-area transit systems. I have commuted to work by Metro bus in the past, using express service from the Kent park-and-ride lot and subsequently (after a move) the South Bellevue lot. I know that efficient express transit service using park-and-ride lots can work extremely well when properly planned.	Thank you for your comment.
L20	PN	1	Jack A. Austin 2123 102nd Avenue NE Bellevue, WA 98004 Consultjaa@aol.com Agency: Public	I am writing to express my concerns regarding the Interstate 405 Corridor Program Draft EIS. I am a 35 year resident of the Eastside and a registered Professional Engineer with more than 20 years of planning experience with the company formerly known as Puget Power. As such, I was responsible for planning for increased customer growth, increased load demand and customer usage patterns. All of these are analogous to the transportation planning problems facing WSDOT. I agree with the "Need" statement. However, I disagree with the planning process and the identification of the "Alternatives."	As described in the summary section, the I-405 Corridor Program is a pilot for the "Re-inventing NEPA" process which was established, in part, to obtain early involvement from resource agencies and stakeholders in transportation planning decisions. The alternatives were developed, screened, and advanced based in part on input received at numerous open houses, as well as from the I-405 Corridor Program Citizens, Steering, and Executive Committees. Agencies with jurisdiction over the study area were invited to give their written approval (concurrence) on the alternatives included for analysis in the Draft EIS.
L20	TR	1	Jack A. Austin 2123 102nd Avenue NE Bellevue, WA 98004 Consultjaa@aol.com Agency: Public	I see three (3) main transportation corridors serving the Everett-Seattle- Tacoma area. These are the Alaskan Way Viaduct (old 99), I-5 and I-405. Our most critical link is the Alaskan Way Viaduct. Should that facility fail, we will be reduced to only 2 corridors and total chaos. That facility must be replaced as soon as possible. **The I-405 Corridor Program fails to look at an additional corridor as an alternative to improving not only the 405 corridor transfer capability but also the total area transfer capability.**	A study of a freeway in east King County sponsored by WSDOT (CONEKC) showed there would be limited effects on the traffic on I-405. However, the three committees advising the study looked at several concepts that were ultimately discarded, including a freeway in east King County.
L20	TR	2	Jack A. Austin 2123 102nd Avenue NE Bellevue, WA 98004 Consultjaa@aol.com Agency: Public	The Interstate 405 Corridor Program described in the DEIS seems to be just another WSDOT patchwork effort to solve our regions transportations problems. The Interstate 405 Corridor Program seems to offer us increased HOV or Bus capaity when what we really need is to increase North-South transfer capability. This approach to planning just moves the traffic jams for one place to another. As a result, WSDOT has promulgated a congestion from place to place at a cost of up to $11.3 billion.	The alternatives cover a range of potential congestion solutions that look at the I-405 system in the context of the entire Puget Sound region. The transportation analysis studies effects of I-405 improvements within the study area and across the regional transportation network. WSDOT is conducting additional studies that examine the combined effects of the major corridor projects such as I-405, SR 520, and the Alaskan Way Viaduct.

Code Number			Name	Comment	Response
L20	TR	3	Jack A. Austin 2123 102nd Avenue NE Bellevue, WA 98004 Consultjaa@aol.com Agency: Public	WSDOT's microscopic patchwork planning approach fails to recognize the benefit of adding an additional North-South corridor. By constructing a new fourth transportation corridor to the east, much of the existing traffic and a lot of new traffic will shift to the new fourth corridor. This new corridor running form the Arlington area to south of Olympia might be called I-605. I-605 would immediately relieve many of the current pinch points by taking a sizeable portion of the North-South through traffic off of the existing three main corridors. I cannot find anything in the Interstate 405 Corridor Program DEIS that addresses this possibility. The Manual of Uniform Traffic Control Devices (MUTCD) requires that traffic studies be undertaken to identify flow volumes and timing. I am sure that you have undertaken these studies and can predict the great benefit that would result from adding a fourth corridor to the east. Looking at maps of the United States, one can see that most metropolitan areas have constructed a system of beltways that allow traffic to flow around those cities. Where are our beltways? Why not build an Interstate 605 beltway to relieve the North/South traffic currently on I-5 and I-405 and Old 99? A truck traveling from Vancouver BC to Portland Oregon has absolutely no interest in driving under the Washington State Convention Center in downtown Seattle. If WSDOT wants to improve "Freight Mobility," building I-605 would be an excellent place to start. I am sure the trucking industry will agree.	A study of a freeway in east King County sponsored by WSDOT (CONEKC) showed there would be limited effects on the traffic on I-405. However, the three study committees advising the project, looked at several concepts that were ultimately discarded, including a freeway in east King County. Thank you for your comment.
L20	TR	4	Jack A. Austin 2123 102nd Avenue NE Bellevue, WA 98004 Consultjaa@aol.com Agency: Public	Additionally, I ask, **Why not build an east-west connector from I-5 to SR-522 along King County-Snohomish County line?** I am sure that your traffic studies will show reductions in volumes on both I-405 and SR-520 from construction of a northern connector. This would also relieve Lake City/Bothell Way congestion.	This connector has been examined as part of other regional studies, including the Trans-Lake Washington study. It was not considered to be a reasonable alternative to improvements along I-405 for north-south travel.
L20	TR	5	Jack A. Austin 2123 102nd Avenue NE Bellevue, WA 98004 Consultjaa@aol.com Agency: Public	Public transportation (buses) alone cannot solve our traffic congestion. Railways constrain travel to narrow corridors. Busses add to congestion. Having to make one or more transfers on a public conveyances places that mode of travel at a psychological disadvantage because of the fear of missing a connection and having to wait a half hour or more for the next bus. In general buses serve only a few who happen to live in one place and work in another place that a bus happens to connect. **WSDOT must de-emphasize its reliance on Public Transportation (buses) to solve the traffic congestion in the Puget Sound region.**	Each Draft EIS alternative included a mix of roadway and transit elements.

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L21	O	1	Bob Baker 3003 218th Ave. SE Sammamish, WA 98075 Agency: Public	My name is Bob Baker. I have been a Washington resident for over 52 years. I have lived on the Issaquah Plateau and worked in Bellevue for the past 28 years. I am a Bellevue Police Captain. In my work and in my everyday life, I drive on Interstate 405 almost every day.	Thank you for your comment.
L21	ECON	1	Bob Baker 3003 218th Ave. SE Sammamish, WA 98075 Agency: Public	As a lifetime resident, I am deeply concerned over our regional transportation issues and know that transportation problems are going to compound as we move forward in the 21st Century. Recently, my concerns peaked when Boeing announced that it was moving its corporate headquarters to Chicago. Several years before, in a speech by the Boeing Chief Executive Officer, Boeing announced that the traffic delays on our regional interstate highways were resulting in extended driving time, costing Boeing millions of dollars. At that time, the Boeing CEO announced that if we, as a region and a state, did not fix transportation problems, Boeing would be forced to move its operations elsewhere. True to this warning, Boeing has started this process by moving its corporate headquarters. I fear that this is only the beginning and that other industries, vital to the economic health of the region, will follow Boeing.	The potential for congestion to motivate firms to relocate to other regions of the country is recognized in the Regional Economic Development subsection of Section 3.16.4.1 in the I-405 Corridor Program Draft EIS.
L21	ALT	1	Bob Baker 3003 218th Ave. SE Sammamish, WA 98075 Agency: Public	With this as a backdrop, I have reviewed the executive summary of the "I-405 Corridor Program NEPA/SEPA Draft Environmental Impact Statement (EIS). I am impressed with the comprehensive approach taken by the Washington State Department of Transportation (WSDOT) and other agencies in developing this programmatic EIS. It is my opinion that Alternative III is the most viable alternative and should be adopted as our comprehensive strategy in implementing the more than 300 already-developed solutions to our transportation problems. I will explain why I think that WSDOT should adopt Alternative III as its comprehensive strategy.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
L21	ALT	2	Bob Baker 3003 218th Ave. SE Sammamish, WA 98075 Agency: Public	After examination of the No Action Alternative, I discounted it from consideration. This alternative allows for a limited expansion of state highways in conjunction with arterial improvements being made by local agencies. Phase I of Sound Transit's plan are included. The No Action Alternative predicts a 20% increase in transit service hours by the year 2020. This increase, it is assumed, will come from an increased demand for transit service due to commuter parking cost increases that will be driven by market forces. It is projected that an additional 250,000 people will be moving into this area over the next 20 years. The No Action Alternative does not prepare us to deal with our current levels of traffic congestion, much less what will be the inevitable result of an increase in population. Although the No Action Alternative $676.6 million dollar price tag is attractive to me as a tax payer, this alternative seems ineffective in relation to our current transportation problems and needs.	The assumed 20 percent increase in transit service included in the No Action Alternative is relative to the current King County 6-year plan. None of the transportation elements of the No Action Alternative were based on expected demand in 2020 or 2030. Rather, they reflect currently planned and funded projects within agency plans and capital improvement projects.
L21	ALT	3	Bob Baker 3003 218th Ave. SE Sammamish, WA 98075 Agency: Public	I focused my analysis on the remaining 5 alternatives. The following table compares the solutions proposed by the five alternatives and the related costs of each alternative. This table displays how individual solutions relate to each alternative. (SEE ORIGINAL FOR TABLE, in attached Final EIS compact disk or on file at WSDOT Urban Corridors Office.)	Please see additional responses to your letter below. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L21	ALT	4	Bob Baker 3003 218th Ave. SE Sammamish, WA 98075 Agency: Public	**Alternative I - High-Capacity Transit/Transportation Demand Emphasis.** This alternative would minimize road construction and maximize existing transit options. It would include construction of a physically separated, fixed-guideway High Capacity Transit (HCT) System to serve the major activity centers along the I-405 corridor. Emphasis is placed on non-construction treatments. Minimal improvements would be made to existing I-405 and no additional lanes would be added. This alternative has the lowest price tag of the four alternatives.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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				I reject this alternative. As a society, we need to force people out of their single person cars and into using public transportation. The only way that we can accomplish this task is by creating a public transportation system that is efficient, convenient, and less time consuming than driving an single occupant vehicle. This alternative does not go far enough in developing alternative transportation options. It does little to expand the existing transportation infrastructure which is essential for future transportation planning and growth. We must develop and improve our public transportation systems and repair and expand our highways.	
L21	ALT	5	Bob Baker 3003 218th Ave. SE Sammamish, WA 98075 Agency: Public	**Alternative II - Mixed Mode with High-Capacity Transit/Transit Emphasis** Alternative II also focuses heavily on construction of a physically separated, fixed-guideway HCT System. It substantially expands local transit service, HOV freeway-to-freeway ramps, and other public transit options. Alternative II provides for an additional lane on I-405 in each direction, improvements to the I-405 /SR 167 interchange, and the widening of SR 167 in certain areas. It also provides for improvements to the local infrastructure in relation to the state highway system. Alternative II is a better blend of solutions than observed in Alternative I. It adds significant improvements to the public transportation system, and it improves the existing transportation infrastructure. Alternative II is the second most costly of the three alternatives. I reject Alternative II for two reasons. First, it does not go far enough in developing and improving the current transportation infrastructure. Second, its price tag is too high. The cost of developing the fixed-guideway HTC System makes this alternative cost prohibitive.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L21	ALT	6	Bob Baker 3003 218th Ave. SE Sammamish, WA 98075 Agency: Public	**Alternative IV - General Capacity Emphasis** It is because of the lack of public transportation options and the prohibitive costs that I reject Alternative IV. This alternative does little for maximizing public transportation solutions and is by far the most expensive. It would maximize freeway capacity by providing one additional lane in each direction on I-405, along with four-lane I-405 express roadway and improved interchanges. Alternative IV provides for a 50 percent increase in bus service but does little else to facilitate public transportation when compared to Alternative III.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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L21	ALT	7	Bob Baker 3003 218th Ave. SE Sammamish, WA 98075 Agency: Public	**Alternative III - Mixed Mode Emphasis** In my opinion, Alternative III proposes the best blend of transportation solutions for the region. This alternative expands I-405 by two lanes in each direction with major improvements to interchanges and connecting arterial/freeway capacities. Significant improvements would be made to SR 167 and the I-405/SR 167 interchange. An Eastside bus rapid transit system would be implemented throughout the corridor and local bus service would be doubled as in Alternative I. There would be express buses operating in improved HOV lanes and direct access ramps on I-405, I-90, and SR522. There would be significant improvements in park-and-ride capacity, transit center capacity, along with pedestrian and bicycle improvements. The impact of Alternative III on regional transportation will be significant. This alternative will handle twenty-five to thirty percent more demand, and general traffic times would improve fifteen percent. Only Alternative IV has demand and travel time reduction rates that are higher (i.e., 30 to 35% demand, 20% general traffic time reduction). In addition, Alternative III would improve transit travel times substantially, and HCT showing only slightly less improvement than Alternatives I and II. This alternative would improve congestion on I-405 by approximately 3 hours per day and accident hot spots would be reduced. With a decrease in total accidents, general travel times will significantly improve. Overall, the transit and TDM strategies contained Alternative III could result in a peak period single occupant vehicle reduction rate of ten percent. Of the four alternatives, Alternative III is the third least expensive. Alternative III also has the best mix of solutions to address our transportation problems. It is for these reasons that I favor Alternative III as our regional transportation plan for the future.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3.

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L21	O	2	Bob Baker 3003 218th Ave. SE Sammamish, WA 98075 Agency: Public	Having selected Alternative III as the best option for our future, I would like to discuss issues related to proposed mitigations to environmental consequences. Under Alternative III, the duration of construction impacts on traffic would more than double as compared to Alternative II. During the extensive construction period, travel time reliability for general traffic would be extremely difficult to manage. In response to these impacts, the EIS proposes nineteen mitigation factors. One of these mitigations allows for road closures during non-peak periods to complete critical road segments faster. Another proposed mitigation is to provide monetary incentives to contractors to shorten construction times. Since there are virtually no non-peak periods during weekday daylight hours, it would seem that at least some of the construction work must be done at night. It also appears that some of the work done during the day is intended to be sandwiched between the morning and evening rush hours. To me, providing financial incentives to contractors to do less work does not make sense, and it seems to be a tremendous waste of taxpayer money. The purpose of mitigation is to minimize the adverse effect of construction and road closures on existing traffic flows. An alternative mitigation factor is a requirement that contractors be required to complete their work at night. Even if it could not be required, it would make more sense to provide monetary incentives to contractors to perform construction at night rather than have them shorten their hours of work. Nighttime construction would lessen the adverse impact on traffic and facilitate a more rapid completion time. Currently, much of the freeway paving, bridge repair, roadway maintenance and major street work is completed at night. I see no reason why a majority of this project could not be scheduled at night to better facilitate existing traffic flows.	Emphasis will be placed on reducing the impacts and duration of construction activities. All possible cost-effective mitigation strategies will be considered, some of which may be suggested by the contractor responsible for final construction. See response L21.O-2. Providing financial incentives to reduce the duration of construction impacts has proven to be cost-effective, and in a competitive bidding climate, often saves the taxpayers money. There are advantages and disadvantages to nighttime construction. Advantages such as less disruption to traffic and better access are offset by productivity, quality, and noise related problems.
L21	ALT	8	Bob Baker 3003 218th Ave. SE Sammamish, WA 98075 Agency: Public	In summary, it is my opinion that Alternative III contains the best blend of transporation options to address our regional needs of the future. This alternative improves the roadway infrastructure, and develops public transportation to meet future demands. Finally, of the four alternatives, Alternative III is the third lease expensive and it appears to be the most cost effective.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3.

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L22	O	1	Karen Reid P O Box 1569 Edmonds, WA 98020 Agency: Public	It was a pleasure meeting with you today and obtaining the CD including the Technical Expertise Reports in Support of Draft EIS. I appreciate the opportunity the public has to review the Draft EIS and provide comments and suggestions regarding the impacts, alternatives and mitigation measures identified.	Thank you for your comment.
L22	ALT	1	Karen Reid P O Box 1569 Edmonds, WA 98020 Agency: Public	I live in Lynnwood and worked in Redmond and Bellevue for 2+ years. During that time I commuted via I-405 and have experienced the increasing traffic problem. I understand the need for improvements along the I-405 corridor and strongly support whichever alternative is ultimately chosen.	Chapter 1 of the EIS contains additional information on the adopted purpose and need for action. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L22	ROW	1	Karen Reid P O Box 1569 Edmonds, WA 98020 Agency: Public	Thank you for clarifying the difference between this draft EIS which is at a programmatic level as opposed to later project level environmental impact statements that will follow. In reviewing the draft EIS I was particularly interested in Section 3.14, which summarizes the potential ROW Acquisitions and Displacements for each of the alternatives, specifically the displaces as noted in the table below: (see table in original correspondence) I understand after reviewing the Draft Right-of-Way and Displacements expertise Report available at your office, that the potential displacements of residential housing and business establishments were estimated for the I-405 mainline by referring to aerial photos. I am assuming that the actual individual property owners/tenants were therefore not notified of the project personally before this draft EIS, but may have been notified generally through the publication of public meetings. I would recommend at the project level however, that once exact properties are identified in the alternative ultimately chosen, individual notifications be mailed to property owners/tenants informing them of the impact of the upcoming project, and explaining the entitlements under the Relocation Assistance Program. Being informed of the particulars of the relocation program, such as 1) moving expenses for both residential and commercial occupants, 2) price differential payments for residential owner occupants (the difference between the purchase price of the acquired property and the purchase price of the replacement dwelling, and 3) re-establishment expenses for commercial occupants, may help alleviate their concerns.	Your assumption about notification to property owners is correct. All properties will be acquired pursuant to the Uniform Real Property Relocation and Acquisition Act and State statutory and regulatory requirements which include relocation procedures and notifications to property owners. All affected property owners and tenants will be notified prior to acquisition and/or relocation.

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				In closing, because the Relocation Assistance Program is very complex, I believe it is imperative that property owners/tenants understand how they may be affected in order to respond during the public comment period in an informed manner. I would therefore reiterate my recommendation that potential displaces are individually notified as soon as practical.	The process under the Uniform Real Property Relocation and Acquisition Act and State statutory and regulatory requirements are complex. Attempts will be made to make the process more understandable to the public as the project proceeds.
L23	O	1	Alan C Ralston PO Box 3707 MC 14-49 Seattle, WA 98124-2207 Agency: Boeing	On behalf of the Boeing Company, I would like to extend our comments regarding the I-405 Corridor Program EIS. Finding solutions to increasing mobility along the I-405 corridor while preserving the environment and our quality of life, continue to be of great interest to The Boeing Company. The Boeing Company is the largest single landowner within the Puget Sound region, with over 43 million sq ft of occupied use. In addition, we lease in excess of 3 million sq ft of office/industrial space throughout the Northwest. Affected by the I-405 Corridor, The Boeing Company's major operations include the Everett Plant, Boeing Eastgate Office Park, the Renton Plant, Longacres Office Park, Kent Space Center, as well as many other supporting operations.	Thank you for your comment.
L23	ALT	1	Alan C Ralston PO Box 3707 MC 14-49 Seattle, WA 98124-2207 Agency: Boeing	The Boeing Company supports the Preliminary preferred Alternative, Alternative 3. However, 3 significant issues still need to be addressed within this alternative to secure continued investment by The Boeing Company in this region. These issues are: additional access points to I-405, the preservation of the Burlington Northern rail lines, and additional general purpose capacity lanes south of I-90 to I-5	There is no preliminary preferred alternative in the I-405 Corridor Program Draft EIS. Alternative 3 - Mixed Mode Emphasis, is similar to the preliminary preferred alternative; however, there are several important differences. The preliminary preferred alternative also includes: a high-capacity transit system in the central I-405 corridor; up to two additional general purpose lanes in each direction on SR 167 from I-405 south to SW 43rd Street in Renton; preservation of the existing Burlington Northern Santa Fe (BNSF) Railroad right-of-way for a future transportation corridor; a pedestrian trail in the BNSF right-of-way; and continued analysis of regional pricing and managed/tolled lanes. The Preferred

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					Alternative includes consideration of additional access points to I-405 in Bellevue, Kirkland, and Bothell. Additional access must be consistent with adopted State and Federal policies. The I-405 Corridor Program Executive Committee sent a letter to the Burlington Northern Santa Fe Railroad and appropriate agencies indicating support for preservation of the BNSF corridor for future transportation uses. The Preferred Alternative does not include purchase or other preservation of this property. The Preferred Alternative includes up to two additional general traffic lanes south of I-90, plus consideration of additional auxiliary lanes at key bottleneck locations. For a description of the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L23	TR	1	Alan C Ralston PO Box 3707 MC 14-49 Seattle, WA 98124-2207 Agency: Boeing	Long-term interchange capacity solutions to accommodate HOV, transit, freight and general purpose travel are fundamental to all cities along I-405. Without access solutions to such interchanges as Park Drive in Renton and NE Sixth St in Bellevue, the investment in the I-405 corridor will not support existing or expanded growth in the region.	The I-405 alternatives include major interchange improvements.
L23	TR	2	Alan C Ralston PO Box 3707 MC 14-49 Seattle, WA 98124-2207 Agency: Boeing	In addition, it is vital that we continue to have rail access to our Renton plant via the Burlington Northern rail lines that run along I-405. Currently, all our 737 and 757 fuselages are shipped by rail from Kansas to Renton. The conversion of these rail lines would severely and negatively impact the viability of the Renton plant.	Currently the BNSF has indicated that they intend to keep the existing rail line active into the future. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies.
L23	TR	3	Alan C Ralston PO Box 3707 MC 14-49 Seattle, WA 98124-2207 Agency: Boeing	Historically, the state has not invested in I-405 south of I-90 as they have north of I-90. Many of our trucks use I-405 to move parts that are manufactured in Frederickson in central Pierce County and Auburn to our final assembly facilities in Everett and Renton. Ensuring that these integral parts are delivered in a time sensitive and cost efficient manner is essential to our continued competitiveness in Washington State.	Additional capacity improvements south of I-90 were investigated as part of the development of a Preferred Alternative.
L23	TR	4	Alan C Ralston PO Box 3707 MC 14-49 Seattle, WA 98124-2207 Agency: Boeing	Transportation investments identified in the EIS south of I-90 are considerably under-represented. The I-405 Corridor Program needs to address more effectively the potential for allowable land use densities which exceed 20 million square feet of new uses on our and other adjacent properties within the study area. We must use this opportunity to ensure that enough general-purpose capacity exists to capture future development prospects.	Additional capacity improvements south of I-90 were investigated as part of the development of a Preferred Alternative.

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L23	O	2	Alan C Ralston PO Box 3707 MC 14-49 Seattle, WA 98124-2207 Agency: Boeing	The Boeing Company has been as outspoken advocate of increased public investment and planning of multi-modal transport solutions to meet the mobility needs of our operations and for the community at large. We applaud the Department of Transportation's planning efforts within the I-405 corridor, and understand the challenges that will need to be met in order for the advancement of transportation funding decisions. We encourage and offer any support that The Boeing Company can provide with these critical transportation decisions. Our goal in this planning process is to ensure that transportation congestion and mobility solutions are not a barrier to continued investment in the Puget Sound region. Should you have any questions or need any further information regarding The Boeing Company's position of I-405 corridor issues, please give me a call at (206) 655-4465.	Thank you for your comment.
L24	O	1	Daniel J. Bray 1400 – 92nd Avenue NE Clyde Hill, Washington 98004-3405 Agency: Public	Thank you for the opportunity to comment on the I-405 DEIS. I will be brief. I am a graduate electrical engineer with special interest in transportation matters. I am particularly familiar with the Interstate 405 corridor.	Thank you for your comment.
L24	O	2	Daniel J. Bray 1400 – 92nd Avenue NE Clyde Hill, Washington 98004-3405 Agency: Public	**1.1 Overview . . .** In this paragraph, the DEIS explains that it is a "programmatic" DEIS, focusing on broad corridor-wide issues. While the authors have done a good job examining the proposed program at that level those concerned with details of the program's environmental impact will be looking for quantitative data to support many technical analyses at a more detailed level. It is obvious that it will be some time until those quantitative design data are available to support the needed environmental analyses. The adequacy of the project design and various environmental mitigations, which will inevitably prove necessary, cannot be determined until those more detailed data are available. **Supplemental EIS . . .** Because of the above, the project should schedule and commit a release date for a supplemental EIS at a point where the design can provide adequate detail data for use in lower-level analyses. These analyses will form a basis for project environmental approval.	Follow-on project-level NEPA and SEPA environmental analysis, documentation, and review will be prepared much as you have requested. Please refer to pages S-2 and 3-1 of the I-405 Corridor Program Draft EIS. It is not necessary or appropriate to prepare this documentation as a supplemental EIS based on the requirements of 40 CFR 1502.9 and WAC 197-11-405.

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				2.2 Evaluation of Four Alternatives . . . We question the timing of final selection of a winning alternative from the four alternatives advanced by the DEIS. It seems that the environmental impacts may be significantly different for each alternative. For example, each type of vehicle may have a different environmental footprint. The costs of each alternative may also affect available funding for environmental mitigation. Again, this implies a need for a Supplemental EIS at some point in time one a choice of alternative is made. Again thank you for this opportunity to comment on the DEIS.	
L25	ALT	1	Fred Burnstead Marcelle Pechler 16210 NE 80th St PO Box 628 Redmond, WA 98073 Agency: Greater Redmond Chamber of Commerce	On behalf of the Greater Redmond Chamber of Commerce Board of Trustees, we express our Alternative 3 as the Preferred Alternative of the 1-405 Corridor support for the selection of Program, especially since the Draft Environmental Impact Statement has shown strong support for this alternative. The Redmond Chamber also strongly supports the creation of additional general-purpose capacity along the I-405 corridor. Of all the alternatives, Alternative 3 appears to be the most cost-effective and most efficient, and is the best multi-model approach to solving our region's congestion problems, which can no longer be ignored or delayed. At the same time, Alternative 3 will make our neighborhoods safer by relieving cut-through traffic. Thank you very much for the hard work you have devoted to the I-405 Corridor Program. We commend and support your efforts, and urge you to continue to support and advocate for proposals that provide necessary congestion relief for our region.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3.
L26	ALT	1	Suzanne Suther, Executive Director 155 NW Gilman Blvd Issaquah, WA 98027 Agency: Greater Issaquah Chamber of Commerce	On behalf of the Board of Directors for the Issaquah Chamber of Commerce, we would like to express our support for the selection of Alternative 3 as the Preferred Alternative of the I-405 Corridor Program. The Issaquah Chamber is interested in reducing congestion on I-405 to improve our quality of life by giving us more time for things we enjoy. I-405 (along with SR 520) leads the region in daily hours of congestion with over 50% of the entire day in gridlock. Cost of delays, livability and air quality degradation are obvious impacts. We can ill afford plans that do not directly minimize that amount of waste. Of all the alternatives, Alternative 3 is the most cost-effective and the most efficient. This is critical in a time when budgets are constrained and with the realization that I-405 and I-90 are the lifeblood for the Eastside and the State's high-tech economy.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3.

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				Similarly, Alternative 3 will allow our community to continue to meet the requirements of the Growth Management Act. By developing the infrastructure needed within the Urban Growth Boundaries we can continue to encourage people to build their homes and to stay within the Eastside urban areas. At the same time, Alternative 3 will go a long way in making our neighborhoods safer places to live by relieving the need for cut-through traffic. Individuals who have been forced to cut through our neighborhoods to find congestion relief will find they no longer need to leave I-405 to find that relief.	
L26	O	1	Suzanne Suther, Executive Director 155 NW Gilman Blvd Issaquah, WA 98027 Agency: Greater Issaquah Chamber of Commerce	Lastly, we would like to share our support for those comments made by the Bellevue Downtown Association and the Bellevue Chamber of Commerce in regards to this issue. The BDA and Bellevue Chamber have worked hard to find transportation solutions that provide relief for the Eastside business community. Thank you in advance for the consideration of our concerns and for your hard work on this matter. We are vitally interested in your success in implementing the findings of the I-405 Major Investment Study.	Thank you for your comment.
L27	ALT	1	Joan Cohee 12109 SE 23rd Street Bellevue, WA 98005 Agency: Public	I am opposed to Alternative Preferred Position #3 and encourage you to consider Alternative #5.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. Please refer to the response to comment E66.SOL-1.
L27	TR	1	Joan Cohee 12109 SE 23rd Street Bellevue, WA 98005 Agency: Public	Alternative Preferred Position #3 is not the best long term traffic solution. Scientific studies show that when you build additional lanes of traffic, you relieve congestion only in the short term.	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3 - Mixed Mode Emphasis. Please refer to response to comment E66.SOL-1.
L27	O	1	Joan Cohee 12109 SE 23rd Street Bellevue, WA 98005 Agency: Public	The added convenience of the new construction encourages increasingly more traffic use. This in turn adds to increased noise, air and water pollution.	Please refer to the response to comment E66.SOL-1.

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L27	N	1	Joan Cohee 12109 SE 23rd Street Bellevue, WA 98005 Agency: Public	Adding two more lanes in either direction will yield greatly increased noise levels despite the present sound barriers.	A doubling of traffic on I-405 would increase nearby noise levels by approximately 3 dBA. The exact increase in noise levels that would result from adding two lanes of capacity in each direction can not be determined at this time because the configuration of the new lanes, whether they are placed outside of the existing lanes or on a structure above them, has not been defined. In most areas, it would result in a 1- to 5-dBA increase, assuming no mitigation. In areas where the noise level would approach or exceed the noise abatement criteria, mitigation measures will be evaluated to reduce the noise level.
L27	VQ	1	Joan Cohee 12109 SE 23rd Street Bellevue, WA 98005 Agency: Public	Imagine the visual pollution of twelve lanes of traffic, the increased light pollution at night, and the noise!	The EIS includes an environmental analysis that evaluated increased lanes, noise, and light pollution. The analysis of noise effects may be found in Section 3.2 of the EIS. The potential impacts of increased lanes and light pollution may be found in Section 3.20. In this analysis, it was determined that the existing transportation corridor, where new project improvements would be constructed, has some existing barriers to these effects. These barriers include sound walls that minimize noise as well as glare and visual access to increased lanes of traffic. In addition, during project-specific evaluation, site-specific mitigation could be provided to screen sensitive viewers from these effects.
L27	LU	1	Joan Cohee 12109 SE 23rd Street Bellevue, WA 98005 Agency: Public	The long term effect will be more traffic and increased sprawl. This does not effectively solve the present transportation problem.	The I-405 Corridor Program action alternatives were analyzed to determine the best alternative for implementing a transportation infrastructure that supports regionally and locally adopted land use plans and policies. The infrastructure is needed to ensure that the planned and projected growth is contained within the Urban Growth Area. The growth is projected to take place within urban areas designated in local jurisdictions' comprehensive plans. The facilitation of development or promotion of high-density development in the Urban Centers is influenced by the high-density goals established under VISION 2020, Destination 2030, and local comprehensive plans. This is consistent with the intent of GMA, which calls for higher density development in the urban core of local jurisdictions. Also, please refer to comment response E.66.SOL-1.
L27	ALT	2	Joan Cohee 12109 SE 23rd Street Bellevue, WA 98005 Agency: Public	Alternative #5 benefits the community by developing the infrastructure to support a well-integrated transportation system.	Please refer to the response to your comment L27.ALT-1.

Code Number			Name	Comment	Response
L27	COST	1	Joan Cohee 12109 SE 23rd Street Bellevue, WA 98005 Agency: Public	Additional lanes are added at points of congestion where needed, not throughout the I-405 corridor, therefore pollution and costs are kept at a minimum. Alternative #5 costs substantially less in both dollars and years of traffic disruption.	Please refer to comment E66.SOL-1.
L27	TR	2	Joan Cohee 12109 SE 23rd Street Bellevue, WA 98005 Agency: Public	Alternative #5 provides for more types of transportation. By providing better transit service along I-405 and along east-west arterials and trip reduction incentives, those who cannot or choose not to drive will benefit as well as the auto driver.	Please refer to the response to comment E66.SOL-1. Each of the Draft EIS alternatives includes expanded transit services. Alternatives 1, 2, and 3 have transit service levels that are comparable with the proposal from Sensible Solutions. However, it was determined that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L27	LU	2	Joan Cohee 12109 SE 23rd Street Bellevue, WA 98005 Agency: Public	Aggressive incentives to locate jobs and housing within walking distance of transit centers will slow or further reduce sprawl and the numbers of people needing to commute.	Locating jobs within walking distance of households can be accomplished through continued focus of development in Urban Centers, increased connectivity of transit, and construction of high-capacity transit and improved roadways. More and more people choose to live in urban areas that provide shopping, entertainment, recreation, and employment opportunities. The range of proposed multimodal improvements provides jurisdictions the ability to implement their land use plans for higher densities and services in the centers (urban, activity, industrial/manufacturing) called for in their land use policies. The Preferred Alternative and Alternative 3 best support the change in pressure for growth (projected within *VISION 2020*-PSRC) in the Urban Growth Area (UGA), as compared to the No Action Alternative that continues potential growth patterns in the rural/fringe areas. When the local jurisdictions can be provided an effective regional and local transportation infrastructure, the growth can be directed by regional and local land use plans into the Urban Centers, activity centers, and industrial/manufacturing centers. The designated Urban Centers can absorb that growth.
L27	LU	3	Joan Cohee 12109 SE 23rd Street Bellevue, WA 98005 Agency: Public	Cities like Bellevue which are presently bisected and truncated by I-405 will not become even more so.	Impacts to community cohesion are addressed in Section 3.15

Code Number			Name	Comment	Response
L27	ALT	3	Joan Cohee 12109 SE 23rd Street Bellevue, WA 98005 Agency: Public	In conclusion, I support Alternative #5 and the parts of both proposals which add bicycle and pedestrian lanes, truck climbing, auxiliary lanes, new park & ride spaces, and HOV lanes. In addition, I encourage you to consider a program of `peak period pricing' to balance highway usage on I-405. And, as you look way out into the future, consider other alternatives than widening I-405.	Please refer to the response to your comment L27.ALT-1. As discussed on page 2-22 of the Draft EIS, peak-period pricing was considered on I-405. It was not advanced for detailed study because it is a state or regional solution that likely could not be effectively implemented on I-405 alone. However, the I-405 Corridor Program Executive Committee did recommend consideration of congestion pricing strategies as part of the Preferred Alternative if they are included as part of a larger regional strategy. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L28	O	1	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	The City of Medina is within the proposed project study area boundary, and is a member of the WRIA 8 Lake Washington Watershed Forum, and the Trans Lake Washington Project Executive, Technical and Advisory Committees. The City of Medina has reviewed the NEPA/SEPA draft I-405 Corridor Program EIS and draft Preliminary Section 4(f) Evaluation. We submit the following comments:	Thank you for your comment.
L28	O	2	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	1. Page S-9 of the 1-405 Summary, says it is not possible to determine at the programmatic level, if mitigation would reduce all adverse impact to an insignificant level. It also doesn't include enough detail in the analysis to evaluate impacts of specific project design details, or precise footprints. The Executive Summary states that a record of decision will be prepared for the Final EIS. It is difficult to understand how communities can evaluate impacts without specific project information.	The decision to be made through the I-405 Corridor Program is to determine the best mix of modal solutions, transportation investments, and demand management to improve movement of people and goods throughout the I-405 corridor, reduce foreseeable traffic congestion, and satisfy the overall purpose and need. Please refer to page S-1 of the I-405 Corridor Program Draft EIS. It is necessary or practical to develop project-level information on specific project design details or precise footprints to enable decision-making at this corridor level. As discussed on page S-2 of the Draft EIS, follow-on NEPA and SEPA environmental analysis, documentation, and review will be prepared to enable decisions regarding site-specific, project-level details on alignments, high-capacity transit technology, project impacts, and mitigation measures.
L28	O	3	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	2. The I-405 Corridor Program is identified as a "national pilot project" demonstrating "Re-inventing NEPA." Although it may be an environmental process improvement, we are concerned that important environmental impacts, are mitigated and cost impacts are adequately evaluated. We believe each selected, individual project within the 1-405 corridor should prepare an EIS.	Please refer to the response to your comment L28.O-2.

Code Number			Name	Comment	Response
L28	ALT	1	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	3. Since the I-405 Corridor Program was started, several alternative proposals have been identified that are not included in the programmatic draft EIS. Specifically, the Transportation Choices Coalition - identification of a new PR alternative - #5, which includes strategic investments in choke-points; an aggressive TDM program; strategic transit system improvements; neighborhood protection (traffic calming measures), etc. We believe this alternative provides a set of modal solutions worthy of study and should be included in a Final Project EIS.	Please refer to the response to comment E66.SOL-1.
L28	TR	1	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	<u>Areas of Concern</u> 1. The Executive Summary Tables depicting summary of potential impacts and possible mitigation measures are deficient in describing I-405 construction impacts, delays, cut through traffic on local streets in Clyde Hill, Hunts Point, Yarrow Point and Medina and increased SR-520 traffic. Cut through traffic from Bellevue to SR520 using Overlake Drive NE 12 Street and 84 Avenue NE is already a problem for the City of Medina and Clyde Hill. The proposed I-405 Corridor Alternatives would result in multi-year construction on the I-405 segment thru Bellevue. Traffic would probably divert through the residential streets within Points cities and towns (84th Avenue N.E., 92nd Avenue N.E., N.E. 24th Street, and Points Drive) to avoid construction choke points. Environmental consequences (air and noise pollution) in this residential area could be severe and construction mitigation as well as potentially increasing the need for traffic control measures could be necessary. The City of Medina requires all large projects to park construction employee vehicles in designated off site locations and shuttle employees to the construction site.	This information will be useful during project moves in the detailed design and construction phasing studies. It will be considered during detailed project design.
L28	TR	2	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	2. The EIS does not discuss impacts of I-405 construction shutdowns on SR-520 traffic. Or the increased pollution that will result from increased volumes on 520 and I-90.	Additional analysis of construction traffic impacts are included in the FEIS (Section 3.12.4).

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L28	AQ	1	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	These pollutants include air pollution, untreated groundwater pollution and noise.	At this point, construction impacts have been evaluated in a qualitative manner because information on exact project configuration and phasing has not been developed. Specific impact analysis will be completed as appropriate when individual project elements are evaluated at the detailed level.
L28	TR	3	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	3. The study eliminates Seattle from the study area even though increasing capacity on 405 results in increased traffic impact on I-90 and 520, which terminate in Seattle.	Seattle is included in the secondary study area. Impacts on traffic within Seattle have been identified for several of the alternatives.
L28	TR	4	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	4. The I-405 draft EIS assumes the Trans Lake Washington Project will continue and provide information regarding the I-405/SR-520 interchanges improvements. This assumption is highly uncertain and the lack of funding does not appear to support a fall 2001 Final I-405 EIS. In fact, David Dye of the Trans Lake Washington Project, WSDOT Urban Corridors Office, recently announced a sixty to ninety day delay, until late 2001.	The I-405 and Trans-Lake Washington Projects have been coordinating on the potential design of the I-405/SR 520 interchange. Improvements at this interchange will be included in the I-405 Corridor Program.
L28	TR	5	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	5. Lack of 2020 congestion relief falls short of regional needs. None of the alternatives under consideration provide substantially improved congestion relief. Multi-billion dollar investments required do not justify results to be achieved.	Alternatives 2, 3, and 4 would reduce congestion levels on I-405 below current levels. High growth expected in the study area will limit the amount of overall congestion reduction that can be achieved.

Code Number			Name	Comment	Response
L28	AQ	2	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	6. There is no information presented that identifies project alternative contributions to air quality improvements or compliance with national ambient air quality standards (NAAQS). Project level air quality analysis is needed before a preferred alternative is selected and a Final EIS is prepared.	Project-level analysis and demonstration of conformity cannot be completed until a preferred alternative is advanced into the project-level design phase. Air quality analyses will be completed for the individual project elements when they are evaluated at the project level.
L28	N	1	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	7. The Draft EIS describes the impact of construction noise on adjacent properties, but it does not address the increase in ambient freeway noise levels after project completion. The WSDOT, in cooperation with Seattle Neighborhoods Community groups is installing monitoring equipment on portions of I-5 and SR-520 to determine current noise pollution levels. This should be done in the I-405 corridor before a Final EIS. Noise impact was selected as a screening criterion by the Trans Lake Washington Executive Committee.	Project noise from the freeway and transit systems is addressed in Section 3.2 of the EIS, including the number of residential parcels that would potentially be affected under each of the alternatives. Additional noise monitoring will be conducted during detailed evaluation of specific projects.
L28	FATE	1	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	8. Puget Sound Chinook Salmon and Bull Trout are listed under ESA as "threatened species" and both species occur in the Lake Washington Watershed. The City of Medina has an extensive Lake Washington jurisdictional shoreline, within the project study area boundary, that is likely to contain threatened species and must be protected for fish passage. The City of Medina is investing in restoring salmon habitat within the community. The EIS does identify impacts to fish and aquatic habitat in specific streams, but it does not include a cumulative water impact analysis of alternatives in the Lake Washington Watershed Basin, especially along the eastern Medina shoreline within the project study area boundary. It is not clear if I-405 corridor program actions have adequately considered WRIA 8 plans to restore/protect salmon habitat as required by ESA and the 4(d) rule?	Cumulative surface water impact analysis is addressed in Section 3.23.4.3. WSDOT's "Early Action Environmental Impact Mitigation" strategy addresses programmatic watershed-level mitigation for impacts to fish. This strategy incorporates mitigation concepts that may arise during the project-level environmental process. These mitigation strategies are coordinated with the WRIA 8 "near-term action strategy" as required by ESA and the 4(d) rule.

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L28	TR	6	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	9. The Draft EIS lacks empirical estimates of TDM program effectiveness and relies mainly on pricing strategies. The successful UW "U-Pass" program should be considered for I-405 corridor application.	The Draft EIS includes documentation of expected effectiveness of the TDM program using empirical results of efforts around the country. The TDM program common to all action alternatives does not include pricing strategies, although the effects of regional pricing are summarized in Alternative 1. The TDM program in the Alternatives proposes a "Smart Card" (flex-pass) program for Eastgate, downtown Bellevue, north Renton industrial area, Bothell business parks, Redmond, downtown Kirkland and Tukwila. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.
L28	TR	7	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	10. An ongoing study of regional pricing is inconclusive regarding overall costs and benefits of the Transportation Pricing Program.	Pricing is a regional policy issue. Details were not available for use in this Draft EIS.
L28	TR	8	Dan Becker 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	11. Local governments and neighborhood groups have raised the issue of freeway lids. They are being renewed in preparation for selecting a preferred alternative in the final EIS. Therefore, this topic should have been reviewed at the programmatic level.	Details regarding potential lids will be addressed at the project evaluation level of design.
L29	O	1	James Hutchinson 30107 2nd Pl SW Federal Way, WA 98023 Agency: Public	Thank you for the opportunity to share my personal views regarding the issue before your committee, the preferred alternative for the I-405 corridor program. Although you, and most of the other committee members, have heard from me on a number of occasions representing various organizations and various issues, I write today limiting my comments to my own experiences and insights.	Thank you for your comment.

Code Number			Name	Comment	Response
L29	ALT	1	James Hutchinson 30107 2nd Pl SW Federal Way, WA 98023 Agency: Public	On a daily basis, I travel from the City of Federal Way, were I live, to the City of Bellevue, where I work, and finally to Seattle, where I attend evening law classes. When I arrive in Bellevue my job requires me to travel to various cities throughout the East King County area and into Seattle, thus forcing me to use I-405 on numerous occasions throughout the day. Regrettably, due to my inconsistent schedule and to my enrollment at Seattle University, I am unable to take advantage of many alternative modes of travel. However, I fully understand that a multi-modal solution is needed to solving the problems we face on I-405. The Washington State Department of Transportation, local elected officials, transportation experts, and citizens have spent the last two years developing and analyzing possible solutions to the traffic headache on I-405. From their deliberations four different solution packages were studied. Alternative 3, known as the Preliminary Preferred Alternative, was identified as the most , cost-effective solution that will accomplish the goals of reducing traffic congestion and improving mobility on the I-405 corridor. In fact, as a result of this cost/benefit analysis, it was easy for me to work with various organizations to drum up support for the preliminary preferred alternative before the DEIS was issued. After seeing the results of the DEIS, I continue to support this alternative and am even more encouraged to see how well Alternative 3 compares to the others. The alternative will actually meet future demand while alternatives 1 and 2 do not. Similarly, due to already existing environmental problems on I-405, the variations between the alternatives for mitigation is negligible. I find this last fact encouraging especially after looking at the research that states that Alternative 3 (the mixed mode approach) will actually require less additional impervious surfaces then Alternative 2 (the transit approach). As a daily user of 1-405 I have no reservations in my belief that reducing congestion on I-405 will not only improve my quality of l life, by giving me more time for things that I enjoy, but will also improve the quality of life for the majority of residence who live along this corridor. Furthermore, contrary to what a limited number of individuals might imply, Alternative 3 is a compromise position that provides the best multi-modal approach to solving our region's congestion problems and provides the best balance between the growth management and environmental objectives of our region.	There is no preliminary preferred alternative in the I-405 Corridor Program Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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				I am sure that I do not need to emphasize to you that our region's economic future depends on improving I-405. I-405 has realized nearly a 200 percent increase in traffic congestion over the last 10 years. Cost of delays, livability and air quality degradation are obvious impacts. 1-405 (along with SR 520) lead the region in daily hours of congestion with over 50% of the entire day in gridlock. It should not have been a surprise when the Texas Transportation Institute issued its statement that $930 per person/per year is wasted on congestion in this area. We can ill afford plans that do not directly minimize that amount of waste. This is critical not only for me, but for many of the businesses that are located on the eastside of Lake Washington, especially with the realization that I-405 is the lifeblood for the Eastside and the State's high tech economy. Although Alternative 3 does not go as far as Alternative 4 in its emphasis on GP lanes or on its ability to meet future demands, I feel that Alternative 3 creates a balance between the various modal factions that we can ill afford to ignore or delay. Furthermore, Alternative 3 does not carry the heavy price tag that accompanies alternative 4. Alternative 3 will also allow our community to continue to meet the requirements of the Growth Management Act. By developing the infrastructure needed within the Urban Growth Boundaries we can continue to encourage people to build their homes and to stay within the urban areas of cities located on the Eastside. At the same time, Alternative 3 will go a long way in making our neighborhoods safer places to live by relieving the need for cut through traffic. Individuals who have been forced to cut through our neighborhoods to find congestion relief will find they no longer need to leave I-405 to find that relief.	

Code Number			Name	Comment	Response
L30	O	1	Kelly R Shipley 14215 51st Ave SE Everett, WA 98208 Agency: Public	These comments are submitted in response to the WSDOT's 2001 request for comments regarding the draft EIS for the I-405 Corridor Program. My comments are simply those of a citizen who frequently uses I-405. My work at Boeing frequently takes me from Everett to Renton on business and, like many, I often wonder what improvements can be made to ease the congestion. It is my true belief that the economic benefits resulting from increased mobility are generally greater than can be calculated or expected. Because increased mobility is so important, DOT's affording this opportunity for citizens to comment is greatly appreciated. The analysis and format of these comments is based on the Department's states goals for the I-405 Corridor Program as stated in the Citizen's Guide to the I-405 Program. The "No Action" Alternative has been left out of this analysis because its benefits were so marginal they did not reach the Program's goals nearly as well as Alternatives One through Four.	Thank you for your comment.
L30	ALT	1	Kelly R Shipley 14215 51st Ave SE Everett, WA 98208 Agency: Public	Alternative Four (A-4) is the most favorable. **Reduce Traffic Congestion** The chart on Page 12 of the Citizen's Guide to the I-405 Corridor Program depicts A-4 as providing the greatest overall reduction in congestion on both I-405 and all the other roadways in the corridor. Additionally, the mobility improvement, depicted on the same page, shows that A-4 provides greater than four times the increase in mobility compared to the lowest ranking alternative.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L30	ALT	2	Kelly R Shipley 14215 51st Ave SE Everett, WA 98208 Agency: Public	A-4 provides the greatest benefit to the supporting roadways, aside from benefits to just I-405, because it is the only alternative that adds general purpose lanes to key arterials. A-4's approach for key arterials is more integrated because it takes into account the overall plan that various local agencies have for the arterials in the corridor. Specifically, the other three alternatives rely on local agencies to bolster key arterials whereas A-4 has the general capacity increases for the supporting arterials already in its plan.	Each of the alternatives includes close cooperation among the implementing agencies.

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L30	ALT	3	Kelly R Shipley 14215 51st Ave SE Everett, WA 98208 Agency: Public	Alternatives One and Two utilize a light rail system to achieve most of their benefits which is less effective than A-4s approach. Light rail has traditionally had limited success because of the problems people encounter in trying to get to and from the rail line itself. While there has been some success with these types of systems (eg, London and Washington, DC) other systems have experienced difficulty with people getting to the rail lines (eg, San Francisco's BART system). The rail line contemplated here would be North-South unidirectional without linking trains. The system would be dependent on buses to connect to the main line which would maximize the potential for feeder problems. Washington DC and London are integrated rail lines and not limited to one direction.	Alternatives 1 and 2 assumed an integrated rail system connecting the I-405 corridor with east-west rail lines crossing Lake Washington and extending to Redmond and Issaquah. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.
L30	ALT	4	Kelly R Shipley 14215 51st Ave SE Everett, WA 98208 Agency: Public	While all four alternatives utilize HOV lanes, A-4 requires these the least. For most people, particularly commuters, the loss of schedule flexibility that is inherent in car pooling is not worth the marginal benefits of utilizing an HOV lane. We have all experienced sitting in traffic while the HOV lane sits virtually unused. In many cases, were the HOV lane free for general use and not limited to carpools, the lane would eliminate the traffic jam.	During peak periods, HOV lanes in the Seattle area, including I-405, carry more people, faster, than the adjacent general traffic lanes.
L30	ALT	5	Kelly R Shipley 14215 51st Ave SE Everett, WA 98208 Agency: Public	**Accommodate planned regional growth** A-4 provides the best base for regional growth because it adds three lanes in each direction whereas the other three alternatives rely on 1) light rail, 2) light rail and one new lane, and 3) two new lanes and a bus transit system, respectively. Increasing lane quantity is a true infrastructural improvement for traditional modes of transportation. The appealing aspect of A-4 is that light rail and buses could be added to it at a later date. In fact, the alternatives employing light rail would utilize the median area between the North and South lanes. At a later date, after completing A-4, light rail could be added, if desired, in the median area. Additionally, to attract businesses to the area and improve cargo transport (sub-goals of the Program), light rail, buses and HOV lanes would have little effect while increasing the sheer number of general purpose lanes would allow greater ease of transport by truck.	As a clarification, it would be difficult to add rail into the median of the Alternative 4 freeway in the future. The construction of the added lanes in Alternative 4, plus the express roadway, would require virtually all of the remaining right-of-way in the I-405 corridor. There would be few locations where a light rail line could be added within the freeway footprint.
L30	ALT	6	Kelly R Shipley 14215 51st Ave SE Everett, WA 98208 Agency: Public	**Fix key choke points** All of the alternatives deal with this issue but A-4 is the only alternative to provide increased lanes for key arterials. Along the additional lanes provided by A-4, the expanded arterials will allow the greatest decrease in congestion.	Alternatives 3 and 4 provide key arterial expansion, although Alternative 4 would provide for the greatest amount of arterial improvements. The Preferred Alternative includes some of the arterial improvements from Alternative 4.

Code Number			Name	Comment	Response
L30	ALT	7	Kelly R Shipley 14215 51st Ave SE Everett, WA 98208 Agency: Public	**Enhance livability for communities within the corridor** A-1 provides the least amount of noise pollution, the primary issue to communities in the corridor. The chart on page 26 of the EIS shows that A-4 has the highest potential for noise with a greater than 25 percent increase over A-1. However, this data does not reflect noise abatement or mitigation methods.	This observation is correct. While the EIS calculates the potential for noise impact under each alternative, there is not yet sufficient design development to evaluate specific mitigation measures for the alternatives. The number of actual parcels experiencing substantial noise impacts would be reduced compared to the reported figures by mitigation measures that would be provided as part of the proposed projects and by existing noise walls under each of the alternatives.
L30	ALT	8	Kelly R Shipley 14215 51st Ave SE Everett, WA 98208 Agency: Public	**Seek opportunities to enhance environmental quality** Post construction air pollution, as stated on page 26 of the EIS, would be slightly less under A-4 than under the other alternatives. Because we will be using vehicles that burn fossil fuels for a long time, and consequently using the I-405 system for a long time, this is of great significance over time. Indeed, release of carbon monoxide is a significant concern worldwide. The relative amounts of environmental impacts resulting from construction of each of the alternatives is impossible to quantify based on the EIS. The data is simply to voluminous and varied. However, because each alternative is adding to an existing freeway system the relative inequality, if any, between them would presumably be marginal. Additionally, per page 12 of the EIS, the lead agencies and project proponents are committed to implementing sufficient mitigation of the environmentally adverse affects.	Chapter 3 of the I-405 Corridor Program Draft EIS provides a detailed evaluation and comparison of the effects of the action alternatives relative to existing conditions and/or the No Action Alternative, and it identifies meaningful differences in performance and environmental effects among the alternatives.
L30	ALT	9	Kelly R Shipley 14215 51st Ave SE Everett, WA 98208 Agency: Public	**Support a vigorous state and regional economy by responding to travel needs** As stated in the regional growth section above, A-4 provides the best ability for businesses to efficiently transport goods because it provides more cargo transport opportunity through increased freeway lanes, as opposed to buses and light rail transport which are not modes of cargo transport. The benefit to individual travelers is increased under A-4 because of shorter trip times. If the freeways contains less congestion, as A-4 is calculated to provide, people would reach their destinations sooner if they drive rather than use rail or bus. This is because it would take more time to connect with the rail and bus systems than to simply drive themselves on a clear freeway.	Thank you for your comment.

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L30	ALT	10	Kelly R Shipley 14215 51st Ave SE Everett, WA 98208 Agency: Public	***Conclusion*** Per the above analysis, A-4 satisfied all but one of the Program goals equal to or better than Alternatives One through Three. The goal of enhancing livability for the communities within the corridor is better satisfied by A-1. However, the data supporting that conclusion does not account for any noise mitigation provisions. Although cost is not highlighted as a concern in the EIS, nor is it one of the Project goals, it is worth a brief mention. A-4 is the highest cost alternative at $11.3B as compared to the lowest, A-1, at $5.3B. It is important to note, however, that the other three proposals, with their heavier reliance on rail and bussing, would presumably carry higher operating costs which are not reflected in the EIS cost figures. A cost/benefit analysis that includes a look at the cost-per-unit of reduced congestion, under each alternative, would be helpful.	Operating and maintenance costs were calculated for each alternative. You are correct that the O&M costs for Alternatives 1, 2, and 3 would be higher than Alternative 4. A benefit-cost analysis was performed separately from the EIS. This analysis is available from the WSDOT Urban Corridors Office.
L31	ALT	1	Chuck Moser PO Box 90012 Bellevue, WA 98009-9012 Agency: City of Bellevue	I am writing to inform you that the City of Bellevue has taken an important step towards realizing its *Regional Transportation Vision* by selecting a preferred alternative for the I-405 Corridor program. At our October 15, 2001 City Council meeting, we selected Alternative Three, the "Mixed Mode" alternative as our Preferred Alternative, along with three clarifying components. Alternative Three appears to provide the best performance for multimodal travel within the corridor, and in doing so preserves our neighborhoods' integrity to the greatest degree. The broader Executive Committee's formal selection of a preferred alternative is a critical step for the Eastside as it struggles to meet growth with adequate transportation infrastructure and services.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3. The freeway configuration concept has been jointly developed with the I-405, Trans-Lake, and Downtown Bellevue transportation team members. This configuration was further evaluated as part of the Preferred Alternative.

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				Major improvement to the Eastside transportation system are an essential ingredient to the future of growth management in Puget Sound. Unprecedented East King County growth is expected to continue well beyond 2020 and will be characterized with maturing activity centers and an urban anchor, Downtown Bellevue. However, investment strategies for how to accommodate this growth strategy, Vision 2020, are absent. The I-405 Corridor Program serves to fill this void. Positioning Alternative Three as the preferred course of action will help to advance this smart growth agenda by establishing a blueprint for multimodal investments upon which we can build well into the future. Without it, our regions's ability to realize the benefits and requirements of growth management will be severely strained. The I-405 Corridor Program Draft Environmental Impact Statement clearly articulates that Alternative Three will best serve the mobility needs of the Eastside for the next twenty years while minimizing impacts on neighborhoods. Our support for Alternative Three includes three clarifying components that we believe will strengthen the Preferred Alternative: *** Downtown Bellevue:** Considerable effort has been invested in developing a freeway configuration for I-405 between I-90 and ST 520 that will meet the needs of the corridor, work with potential SR 520 improvements, accommodate the next 20 years of growth in Downtown Bellevue, and be compatible with out I-405/Access Downtown project. A separate position paper articulates the concept for this segment of the system. The preferred alternative must meet the Region's future growth needs and those of the transportation system, which are particularly pronounced in this area of the corridor.	
L31	TR	1	Chuck Moser PO Box 90012 Bellevue, WA 98009-9012 Agency: City of Bellevue	*** Bus Rapid Transit (BRT):** The BRT concept articulated in Alternative Three promises drastic improvements to the Eastside transit system and will provide the high capacity transit needed. However, its reliance on a completed HOV lane system will ultimately comprise its performance soon after 2020. Therefore, we believe that preservation of the BNSF railroad right of way is necessary. The BNSF corridor could potentially be used for another transportation use at some point in the future. Allowing this corridor to be compromised over time could ultimately jeopardize the feasibility of a future high performance, high capacity transit system.	BRT is included in the Preferred Alternative.

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L31	TR	2	Chuck Moser PO Box 90012 Bellevue, WA 98009-9012 Agency: City of Bellevue	*** Managed Lanes:** Again, the BRT concept may be a temporary solution to the Eastside's long-term, high capacity transit needs since this service will operate without the exclusive right of way. In addition, there are competing needs for this constrained corridor. We see the concept of managed lanes as a potential tool to ensure the most efficient use of new capacity resulting from the I-405 Corridor Program. We support continued evaluation of the managed lane concept to determine how to best use the new capacity and to weigh the relative benefits, costs and feasibility of the concept.	Consideration of managed lanes is included in the Preferred Alternative.
L31	O	1	Chuck Moser PO Box 90012 Bellevue, WA 98009-9012 Agency: City of Bellevue	Clearly, the I-405 Corridor Program has been an enormous undertaking for WSDOT and Sound Transit and Project partners. However, the efforts of the project team, the involved committees, partner agencies, and a multitude of active interests has resulted with a plan the Eastside and greater region needs to improve mobility. We must now shift our attention to completing the required planning work and swiftly move into implementation. The program successfully proved that it is possible to move projects more quickly by piloting through a "reinventing NEPA" process. We believe these same principles should apply to implementation. We will continue to work with you, our state legislators, and our regional partners to secure funding and the authority required to complete the project as quickly as possible.	Thank you for your comment.
L31	O	2	Chuck Moser PO Box 90012 Bellevue, WA 98009-9012 Agency: City of Bellevue	By October 24th, City staff will provide technical comments on the Draft EIS. Subsequently, Deputy Mayor Connie Marshall will formally relay our position at the November 15th I-405 Corridor Program Executive Committee Meeting. We look forward to the completion of this important process and continuing progress towards a comprehensive I-405 solution.	Thank you for your comment.
L32	HCA	1	Donna Hogerhuis 39015 172nd Avenue S.E. Auburn, Washington 98092-9763 Agency: Muckleshoot Cultural Resources Program	The Muckleshoot Cultural Resources Program has received and reviewed the "I-405 Corridor Program Draft Environmental Impact Statement". The I-405 project is an enormous undertaking in comprehensive planning for transportation in the Tribe's primary traditional use area, and there are corresponding impacts to cultural resources of concern to the Muckleshoot Tribe.	Large portions of the I-405 study area were traditionally used by peoples now represented by the Muckleshoot Tribe.

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L32	HCA	2	Donna Hogerhuis 39015 172nd Avenue S.E. Auburn, Washington 98092-9763 Agency: Muckleshoot Cultural Resources Program	The document is lacking in an analytical and broad based discussion of adverse impacts (direct, indirect, and cumulative) that the project may have on cultural resources. It is unclear from statements made whether those impacts have been identified at this time. Impacts from construction and especially cumulative impacts cannot be determined until a final alternative with defined Area of Potential Effect (APE), including indirect effects, is set forward and archaeological surveys of the APE are conducted. In Section 3.21.2 the document states "formal compliance with Section 106 would take place during subsequent project level environmental analysis, documentation and review." The Tribe was not consulted prior to this agreement taking place and, as stated in letter dated March 27, 2001 the Muckleshoot Cultural Resources Program is very concerned over the lack of a comprehensive ethnographic study of the project prior to choosing an alternative, to ensure that resources are identified early in project planning stages, while design flexibility remains to ensure the least impact possible for cultural resources.	A tribal cultural resources study will be conducted prior to or at the time of project-level review. Impacts from construction and cumulative impacts cannot be determined until a final alternative with a defined area of potential effects (APE) (including indirect effects) is set forth and archaeological surveys of the APE are conducted. The Washington State Department of Transportation (WSDOT) Urban Corridors Office (UCO) is committed to conducting the necessary tribal cultural study at the same time the archaeological surveys are conducted. WSDOT UCO is responsible for consultations with the Muckleshoot Tribe and is committed to meeting with the Tribe before beginning the archaeological and tribal cultural resources studies that will be undertaken for the project-level review. The decision on how best to comply with Section 106 will be reached through consultations between WSDOT UCO, the State Historic Preservation Officer (SHPO), and the affected Tribes.
L32	HCA	3	Donna Hogerhuis 39015 172nd Avenue S.E. Auburn, Washington 98092-9763 Agency: Muckleshoot Cultural Resources Program	In the Draft EIS, Areas of High Probability were noted near current waterways in determining potential effects of the Alternatives. The original and altered location of water forms near the project area was not considered. The EIS should analyze both past and present corridors of waterways near the project to determine potential archeological sites. The actual boundaries for which data was collected are also omitted from the document. This should be disclosed to support the .25 mile APE on either side of the project element that was suggested. At this time, the Muckleshoot Cultural Resources Program is requesting that the APE be expanded to include impacts disclosed by ethnographic study information as well as archeological information collected at all ground disturbing activities such as staging areas and borrow niece.	The I-405 Corridor Program Draft EIS is "programmatic." The original and altered location of water forms near the study area is a level of analysis more appropriate to a project-level environmental analysis, documentation, and review. Project-level analysis will reflect the quarter-mile area of potential effect (APE). Widening the APE to include impacts disclosed by tribal cultural study information, etc., as suggested by the Muckleshoot Cultural Resources Program, will be taken into consideration by the Washington State Department of Transportation (WSDOT) Urban Corridors Office (UCO) during scoping for the project-level environmental analysis, documentation, and review.
L32	HCA	4	Donna Hogerhuis 39015 172nd Avenue S.E. Auburn, Washington 98092-9763 Agency: Muckleshoot Cultural Resources Program	Cumulative impacts from the project that may occur along the corridor have not been fully evaluated at this time. By separating the analysis and Section 106 responsibilities into a project-by-project basis the cumulative impacts on cultural resources will not be adequately disclosed. A comprehensive study determining all potential cumulative impacts should be conducted before the Final EIS is sent for public review. We cannot support the project until such a time that this information is available for our review and discussion.	This suggestion regarding cumulative impacts and the implication of conducting project-by-project analysis, etc., as described by the Muckleshoot Cultural Resources Program, will be taken into consideration by the Washington State Department of Transportation (WSDOT) Urban Corridors Office (UCO) during scoping for the project-level environmental analysis, documentation, and review.

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L32	HCA	5	Donna Hogerhuis 39015 172nd Avenue S.E. Auburn, Washington 98092-9763 Agency: Muckleshoot Cultural Resources Program	For the Alternative chosen, the Muckleshoot Tribe would like to review the scope of work for each archeological survey for completeness and accuracy. We would also like to have a professional archaeologist present during all ground disturbing activities, and we would like to option to send a Tribal monitor to assist the archaeologist.	The suggestions of the Muckleshoot Cultural Resources Program will be considered by the Washington State Department of Transportation (WSDOT) Urban Corridors Office (UCO) during scoping for the project-level environmental analysis, documentation, and review.
L32	HCA	6	Donna Hogerhuis 39015 172nd Avenue S.E. Auburn, Washington 98092-9763 Agency: Muckleshoot Cultural Resources Program	Finally, the document states that Tribal consultation on TCP that may be affected was completed with the Muckleshoot Tribe. This statement is false and misleading. The Tribe was given an overview and presentation of the potential Alternatives earlier this year, and at no time did the discussion lead to the potential impacts on areas of interest to the Tribe, nor were ethnographic studies to identify sites and potential impacts undertaken.	No discussions regarding traditional cultural properties (TCPs) have been conducted with the Tribe, and no tribal cultural studies to identify sites and potential impacts have been conducted. Section 3.21.2 has been revised to make this more clear.
L32	ALT	1	Donna Hogerhuis 39015 172nd Avenue S.E. Auburn, Washington 98092-9763 Agency: Muckleshoot Cultural Resources Program	As stated earlier, the Muckleshoot Tribe cannot support any of the Action Alternatives at this time, as the proper analysis of impacts on cultural resources has not been conducted to date. The Cultural Resources Program would like a written request addressing our concerns. If you have any questions please call me at (360) 802-2202, extension 103.	Please refer to the responses to your comments L32.HCA-1 through L32.HCA-6.
L33				There is no correspondence numbered L33. This gap in the comments sequence is the result of a coding error.	
L34	O	1	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	The Muckleshoot Indian Tribe Fisheries Department has reviewed the Draft Environmental Impact Statement (DEIS) and Draft Preliminary Section 4(f) Evaluation for the I-405 Corridor Program. The following comments are in the interest of protecting and/or restoring the Muckleshoot Indian Tribe's treaty protected resources and access to those resources. In general, as a programmatic document, the DEIS is a reasonable first attempt to analyze the potential impacts associated with a variety of transportation projects and programs throughout the I-405 corridor area. The DEIS attempts to quantify the potential impacts associated with each alternative as much as possible and is informative as a result.	Thank you for your comment.

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L34	FATE EJ	64 2	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	However, there are several areas where the DEIS is lacking sufficient information and analysis as noted in general comments below, as well as, specific comments attached to this letter. Lack of consideration of Treaty Fishing Access and Environmental Justice Issues for the Muckleshoot Indian Tribe. The DEIS does have a brief section on treaty rights; however, the information is incorrect and does not consider the program's potential to adversely affect the Muckleshoot Indian Tribe's ability to access its Treaty-protected resources. Several of the action alternatives involve road construction and/or modifications that could result in additional obstructions placed within streams and rivers that could interfere with the Tribe's ability to harvest treaty-protected resources. The DEIS notes that your intention is to avoid sensitive areas where possible; however, given the location of the existing roadways, there is potential for additional structures to be built in or near streams and rivers. Therefore, the FEIS should acknowledge the potential for impairment of the Tribe's ability to access its treaty protected resources under each of the action alternatives.	The Final EIS includes additional language regarding treaty fishing access and Environmental Justice issues for the Muckleshoot Indian Tribe and to acknowledge the potential for impairment of the Tribe's ability to access its treaty-protected resources under each of the action alternatives. Compliance with Presidential Executive Order (EO) 12898 and Federal Highway Administration (FHWA) Order 6640.23 is discussed in Appendix G, Environmental Justice, of the I-405 Corridor Program Draft EIS. Section 3.8.1.4 on Tribal treaty fishing rights and access has been revised. Specific fisheries and treaty rights issues will be considered in later project-level environmental documentation.
L34	O	2	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Furthermore, the Tribe requests an opportunity to discuss this issue with the project proponents and federal permitting agencies prior to a decision about the preferred alternative.	A meeting was held on January 10, 2002 between staff from the Muckleshoot Tribe Fisheries and Cultural Resources Departments, WSDOT, and FHWA to discuss issues raised by the Tribe in their October 16, 2001, and October 24, 2001, letters on the I-405 Corridor Program Draft EIS and Draft Preliminary Section 4(f) Evaluation.
L34	EJ	1	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	In a related comment, the DEIS' technical report and section on Environmental Justice fails to consider that the Muckleshoot Indian Tribe has the potential to be uniquely harmed by the implementation of the corridor program. The existing roadways have caused adverse impacts to fisheries habitat and will likely continue to do so despite mitigation (as acknowledged in the DEIS). Since the entire corridor program is within the Muckleshoot Indian Tribe's Usual and Accustomed Fishing Area, the Tribe could be impacted in unique ways that were not considered by the DEIS. For example, if fisheries production in Water Resource Inventory Areas (WRIA) 8 and 9 is reduced as a result of this program through habitat and water quality degradation, then the Tribe will have less opportunity to exercise its treaty rights by having less fish resources available for harvest. The DEIS fails to make this connection and should be modified accordingly.	The Environmental Justice analysis conducted for the I-405 Corridor Program Draft EIS was based in part on a review of the series of expertise reports prepared in support of the Draft EIS. As reported in these expertise reports, including the Fish and Aquatic Habitat Expertise Report, at the level of analysis performed, no substantial adverse impacts are expected as a result of the I-405 Corridor Program. As stated in the Methodology discussion contained in the I-405 Corridor Program Draft Environmental Justice Expertise Report, for purposes of this Environmental Justice analysis, substantial adverse impacts were considered synonymous with high and adverse impacts as described in Presidential Executive Order (EO) 12898 and Federal Highway Administration (FHWA) Order 6640.23. As there were no substantial adverse impacts expected as a result of this program, none of the impacts of this program can

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					be described as having a high and adverse impact in the context of EO 12898 or FHWA Order 6640.23. As there are no high and adverse impacts expected as a result of this program, the analysis therefore concluded that no high and adverse human health or environmental effects of the program are expected to fall disproportionately on minority or low-income populations. The program was therefore considered to be consistent with the policy established in EO 12898 and FHWA Order 6640.23. Specific fisheries and treaty rights issues will be considered in later program-level environmental documentation.
L34	FATE	65	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	At this time, the Tribe's Fisheries Department does not have a position on which alternative has the greatest potential to protect the Tribe's treaty resources and access to those resources. As far as action alternatives are concerned, it appears that Alternative 1 has the least potential to adversely affect treaty-protected resources; however, we would need much more information before reaching this conclusion. In lieu of advocating for a particular alternative, we recommend that the chosen alternative fully mitigate its environmental impacts in a timely manner and avoid impacting treaty fishing access entirely. As a part of this recommendation, the environmental mitigation proposals may need to be more extensive and completed sooner than proposed in the DEIS.	WSDOT's Early-Action Environmental Impact Mitigation Decision-Making Process has been developed to advance mitigation efforts including impact avoidance.
L34	O	3	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	The Tribe's Fisheries Department is also reserving judgement on the proposal to conduct corridor-wide mitigation in lieu of site specific or subbasin specific mitigation. We are concerned this proposal has a great potential to set precedence for future actions by the Washington Department of Transportation and others. Without additional information, it is pre-mature to make a recommendation on such an approach. Therefore, we ask for the opportunity to review corridor and site-specific mitigation proposals early in the decision-making process, particularly prior to the selection of a preferred alternative and/or any federal consultation activity.	The I-405 Corridor Program is a national pilot study for the "Transportation Decision Making Process Improvement." This approach moves NEPA decision-making to the early stages of long-range planning for transportation projects. As a result, it is expected to provide a longer window within which to resolve environmental issues, the potential for a greater range of environmental solutions, and improved certainty that decisions will not have to be revisited later during the project development and permitting. Because the I-405 Corridor Program is a programmatic EIS as compared to a project-level EIS, it does not focus on specific design

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					details or site-specific mitigation for each of the nearly 300 individual transportation improvements that are being considered. Instead, it examines broad corridor-wide issues. This programmatic analysis is appropriate and necessary at this early stage in the transportation planning and decision-making process, when many project-level design details are not meaningful in evaluating effects on mobility, transportation performance, and environmental documentation, and review will be conducted to enable decisions regarding project-level design, site-specific impacts, and mitigation measures. No decision has been made at this time to conduct "corridor-wide" mitigation in lieu of site-specific or sub-basin specific mitigation. WSDOT is committed to pursuing early-action environmental impact mitigation for some of the unavoidable natural resource impacts of transportation improvement projects associated with the I-405 Corridor Program. WSDOT is currently seeking approval of a process for making decisions on early-action mitigation that builds upon the Alternative Mitigation Policy Guidance Interagency Implementation Agreement (adopted in response to RCW 77.85.100). Under this Agreement, off-site (and in some cases) out-of-kind mitigation can only be used where it is the best choice for mitigating unavoidable impacts (e.g., when those impacts cannot be adequately, practicably, or as effectively mitigated through minimization or on-site in-kind compensatory mitigation undertaken concurrent with project construction). The proposed early-action mitigation process for the I-405 Corridor Program looks broadly for mitigation opportunities that can be implemented in advance of, and to compensate for, anticipated unavoidable project impacts. The co-leads appreciate the involvement of the Muckleshoot Tribe staff regarding the I-405 Corridor Program. WSDOT has requested the Tribe's input on the early-action mitigation decision making process. WSDOT will request the Tribe's review of any specific early-action and site-specific mitigation proposals as early in the decision-making process as possible.

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L34	O	4	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Finally, by way of this letter, the Muckleshoot Indian Tribe requests to be invited in any federal Endangered Species Act (ESA) and Clean Water Act (CWA) consultation activities when they begin. A copy of this letter is also being sent to the National Marine Fisheries Service, the U.S. Fish and Wildlife Service, and the Environmental Protection Agency. We would appreciate any assistance that the federal Highway and Federal Transportation Administrations can offer to honor this request.	At a January 10, 2002, meeting held between staff from the Muckleshoot Tribe Fisheries and Cultural Resources Departments, WSDOT, and FHWA, all parties agreed to meet at a later date (after the ESA and Clean Water Act consultation processes are better identified) to determine the appropriate level of Tribal involvement.
L34	O	5	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	We appreciate the opportunity to review this DEIS. If you have any questions about these comments, or would like to set up a meeting to discuss these comments, please contact Karen Walter, at (253) 939-3311, extension 116.	Thank you for your comment.
L34	WR	1	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page S-28- We support the concept that any new road crossings of streams would be via "a bridge spanning the 100 year floodplain.". This mitigation measure should be implemented universally because it will have the fewest impacts to salmonid habitat. Furthermore, bridges should be used as the preferred crossing method for any culverts that need to be modified for fish passage because they are better suited to pass wood, water, and sediment to downstream areas.	Your comment is acknowledged.
L34	WR	2	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page S-30 We support infiltrating treated stormwater as the preferred method of stormwater mitigation. This approach should be used in all areas where there are appropriate soils.	Refer to the response to comment L41.WR-17.
L34	WR	3	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Pages S-27 through S-31 The increase in impervious surfaces percentages in the summary section appears to be inconsistent with the Groundwater Report. The summary section implies that there will be less than 1% increase for all alternatives, whereas the Groundwater report suggests that the impervious surfaces increases will vary from 7% for the No Action Alternative to 36% for Alternative 4.	There is no inconsistency; each report uses a different basis for reporting impacts. The percentage number given in the environmental summary table is new, project-related impervious area as a percentage of the entire, 134,000-acre study area. Thus, Alternative 4, with 1,061 acres of impervious surface, represented 0.8 percent of the entire study area. Wording has been added to make this clear. The percentage given in the individual groundwater impact sections, as explained in each of these sections, is percent increase over the existing transportation-related impervious area within the study area (2,575 acres). Taking Alternative 4 as an example, once again, the 1,061 acres of new impervious surface represent a 41 percent increase over the existing transportation-related impervious area within the study area.

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L34	WR	4	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Also, the Summary Table under Environmental Consequences indicates that there will be "substantial effects on hydrology or water quality" under the No Action Alternative and Alternative 1. However, the Surface Water Report uses an analysis standard of "a project-related increase of 1 percent impervious area was judged to be the minimum threshold for any appreciable impact upon baseline recharge and associated base flow reduction within a basin". As noted above, the Groundwater report indicates that there will be a minimum of 7% increase in impervious surfaces for the No-Action Alternative and a 12% increase under Alternative 1; therefore, both the No-Action and Alternative 1 will have substantial impacts using this standard. The FEIS should address these discrepancies.	The sentence immediately ahead of the quoted sentence states "Potentially substantial operational impacts were judged to occur within basins experiencing a substantial increase in impervious surface (1 percent or greater of total basin area) which could result in a permanent reduction in stream base flow." As stated in response to comment L34.WR-3, the impervious area percentages for the groundwater sections of the I-405 Corridor Program Draft EIS are percent increases over the existing transportation-related impervious area (2,575 acres) within the study area.
L34	WR	5	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3-2 The DEIS states "It is not possible to determine at the programmatic level of analysis of this Draft EIS if mitigation would reduce all identified adverse impacts to an insignificant level". This statement may contradict with statements made in the Surface Water Quality report on page 80	There is no contradiction; two different conditions are being discussed. The discussion on page 80 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report deals with general regional trends that may affect water resources, not just the I-405 Corridor Program, which is discussed on page 3-2. The I-405 Corridor Program will mitigate impacts caused by the program improvements with the goal to improve existing conditions.
L34	WR	6	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Pages 3.5-3 and 3.5-4 The discussion about surface water impacts on these pages is a reasonable approach to determine potential impacts. However, the DEIS fails to note here (as well as the Surface Water Quality report) that the Clean Water Act Section 303 (d) list for Washington State is not comprehensive and they may be streams that are experiencing temperature, dissolved oxygen, and other water quality problems that are not documented. The 303 (d) list is an initial source to determine impacts. It seems that the Washington Department of Transportation should have some monitoring data available for the affected streams as part of its National Pollutant Discharge Elimination System (NPDES) permit. The impact analysis section analysis is not adequate to address surface water quantity and quality impacts.	In addition to the Clean Water Act Section 303d List , other sources of water quality information were consulted during the preparation of the I-405 Corridor Program Draft EIS. For instance, available basin plans for a number of the streams in the study area were reviewed. Contact was also made with city and county staff familiar with stream conditions in their respective jurisdictions. Further explanatory text has been added to Section 3.5.3.1 in the Final EIS. Contact was made with Ed Molash at the Washington State Department of Transportation (WSDOT) (personal communication with Ed Molash, WSDOT Olympia Office, December 3, 2001). He stated that WSDOT has no water quality monitoring data for streams in the study area. Additional water quality information can be found in Sections 4.3 and 4.4 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report.

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L34	WR	7	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.5-5 The DEIS should explain how the reader can determine whether or not groundwater used by fisheries will be substantially reduced as a result of the alternatives. There is no discussion on this topic in the DEIS nor in the referenced Groundwater Resources report. The analysis only considers impacts to potable water.	A program-level groundwater analysis was conducted to evaluate the effects of each alternative on groundwater quality and quantity including base-flow reduction potential. The analysis consisted of tabulating a series of quantifiable data measures for each alternative. The data measures included such general items as number of nearby wells; number of wellhead protection areas (WHPAs), sole-source aquifers (SSAs), and critical aquifer recharge areas (CARAs) crossed; recharge area decrease; and new impervious surface. As discussed in Section 3.5.2.2 of the I-405 Corridor Program Draft EIS, the potential for reduced groundwater recharge, which is related to surface water base flow, was evaluated based on surficial geology and CARA ratings assigned by King County Department of Development and Environmental Services (DDES) and total new impervious surface area estimated under each alternative. The details of the groundwater analysis are contained in Section 3, Methodology and Coordination, of the I-405 Corridor Draft Groundwater Resources Expertise Report, which was reviewed and approved by the co-lead agencies. Detailed analysis and evaluation of impacts related to specific projects will be conducted in the future when adequate project-level design detail is available.
L34	WR	8	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.5-5 Section 3.5.3.1 The Green River's flow is controlled by the US Army Corps of Engineers' Howard Hanson Dam and the City of Tacoma's Municipal Water Diversion dam, not just the Corp's dam.	The correction has been made to the text.
L34	WR	9	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.5-9 Stream Classification King County's Stream Classification system is not the only system that applies to the Corridor Program Area. Each of the jurisdictions within the area have their own critical regulations, which usually include a stream classification system. These classification systems vary from jurisdiction to jurisdiction. Some afford more protection for salmonid habitat than others. The DEIS fails to acknowledge these other regulations, their differences, and how specific waterbodies will be affected as a result. Alternatively, the authors may intend that only King County' 'standards will apply to the entire project area. Either way, the FEIS should discuss this issue in detail.	The King County stream classification is a convenient way of presenting most major streams in the study area. It also identifies streams that are shorelines of the State under the County Shoreline Master Program. Using this system in the EIS implies no predetermined level of protection or mitigation that would be afforded the streams and their fisheries resources.

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L34	WR	10	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.5-10 Table 3.5-1 is somewhat meaningless for two reasons. First, there is no relationship between the Washington Water Quality stream classification system and King County's stream classification system. Second, as noted above, King County's stream classification is not the only applicable stream classification standard.	Please refer to the response to comment L34.WR-9.
L34	WR	11	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Also, just below Table 3.5-1, there is some discussion about the stormwater and water quality facilities along I-405. We have two comments. First, the FEIS should have a map that shows all of the existing stormwater facilities in the program area. Second, there should be information about specific portions of I-405 served by existing facilities as part of Washington Department of Transportation's NPDES permit, including their compliance with existing standards, etc.	Existing Washington State Department of Transportation (WSDOT) stormwater facilities are shown in Figure 3-1 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report. WSDOT has no data documenting specific compliance of any of its stormwater facilities within the study area. Refer to the Response to Comment L34.WR-6.
L34	WR	12	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.5-12- Table 3.5-2 "Summary of Water Resources Impacts" Given the discrepancy between the DEIS and the technical reports, it is likely that the information in this table is inaccurate based on previous comments above.	Refer to the responses to comments L34.WR-3 and L34.WR-4.
L34	WR	13	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.5-13 Operational Impacts The FEIS should update this section based on the previous comments regarding discrepancies in increases in impervious surfaces.	Refer to the responses to comments L34.WR-3 and L34.WR-4.
L34	WR	14	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Also on this page there should be a summary table of the increase in annual pollutant loads by parameter under each alternative. Further discussion that is available from the issue specific technical reports should be brought forward into the FEIS to provide clarity.	More details on the calculated pollutant loads for the I-405 corridor can be found in Section 5 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report, which is incorporated into the EIS by reference.
L34	WR	15	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.5-14 Stormwater Manual The DEIS indicates that activities under the No-Action Alternative would be in compliance with the Department of Ecology's updated Stormwater Manual and that this manual has criteria that considers impacts to fish, including chinook salmon. Our initial review of the updated Stormwater Manual is that the Manual does not sufficiently address impacts to salmonids; therefore, using the Manual alone, will not fully mitigate impacts to salmonids and their habitats. Specifically, the Manual only considers impacts to stream channels as a result of an increase in peak flows and does not consider the increase in water volumes that will increase stream velocities which could adversely affect salmonids during several life stages.	The comment is correct. Installing stormwater facilities would not necessarily maintain the hydrology of the receiving stream, even if peak flows were not increased. A stormwater pond releases runoff more rapidly than a forested drainage because of the latter's ability for infiltration and shallow interflow. Adding new impervious surface tends to result in a larger volume of runoff during the wet season and reduced base flow during the dry season. Both of these effects can adversely affect stream habitat. Stream and fish habitat enhancement measures are generally identified in the I-405 Corridor Program Draft EIS to address these impacts. Measures such as stream habitat enhancement (large woody debris, pools, and undercut banks) can provide added refuge for fish during higher flows. Riparian restoration can provide added shade and cooler water temperatures during periods of lower flows.

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L34	WR	16	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.5-17 Operational Impacts-Surface Water Standard detention requirements may be generally sufficient to avoid causing or intensifying downstream drainage problems; however, these requirements should not be construed as adequate to address impacts to salmonids and their habitats. Since most of the impacted streams do not have "pre-developed stream channels" (i.e. channel configuration, historical wood loads, etc.), it is very likely that these streams and the salmonids in them will be adversely impacted by additional increases in water volumes, despite stormwater management measures.	Please refer to the response to comment L34.WR-15.
L34	WR	17	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.5-18 The DEIS fails to provide any supporting citations, data, etc. to support statements made regarding impacts to surface waters.	Further methodology, data, and citations can be found in the I-405 Corridor Program Draft Surface Water Resources Expertise Report.
L34	WR	18	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Also, on this same page, under Section 3.5.4.3, the DEIS fails to specifically mention which five basins would have 10 or more projects constructed within their boundaries under Alternative 2. Without this information, it is impossible to discern potential impacts to specific waterbodies.	The basins that would have ten or more projects under Alternative 2 are East Lake Washington (10), Sammamish River (12), North Creek (12), South Kelsey Creek (10), and Springbrook Creek (16). This information can be found in Appendix G of the I-405 Corridor Program Draft Surface Water Resources Expertise Report.
L34	WR	19	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.5-20 The DEIS notes that there is no information quantifying the effectiveness of the current stormwater facilities along I-405. There should be quantifiable information available as part of the WSDOT's 1995 and/or 2000 NPDES permit. The FEIS should be updated with any and all available information.	Although there are no data documenting the water quality effects of the existing Washington State Department of Transportation (WSDOT) stormwater facilities (refer to Response to Comment L34.WR-11), there is a wealth of published data documenting pollutant removal by such facilities (see Response to Comment L34.WR-22). The stormwater facilities constructed to treat runoff from the I-405 Corridor Program will follow guidelines outlined in the Washington State Department of Ecology's (Ecology's) Stormwater Management Manual for Western Washington or functionally equivalent guidance and will aim to prevent water quality degradation due to runoff from new road and highway runoff.
L34	WR	20	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Also on this same page, under Section 3.5.4.4, the DEIS fails to specifically mention which three basins would have 10 or more projects constructed within their boundaries under Alternative 3. The DEIS also fails to mention specifically which seven basin will be affected by 5 to 10 projects. Without this information, it is impossible to discern potential impacts to specific waterbodies.	The basins that would have ten or more projects affected under Alternative 3 are Sammamish River (11), North Creek (11), and Springbrook Creek (14). The seven basins that would have five to ten projects under Alternative 3 are Bear Creek (5), Cedar River (6), East Lake Washington (6), Forbes Creek (5), Juanita Creek (7), South Kelsey Creek (5), and Swamp Creek (5). Refer to the response to comment L34.WR-18.

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L34	WR	21	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.5-21 The DEIS notes that there is no regional information quantifying the effectiveness of the current stormwater facilities along I-405. There should be quantifiable information available as part of the WSDOT's 1995 and/or 2000 NPDES permit. The FEIS should be updated with any and all available information.	Refer to the Response to Comment L34.WR-11.
L34	WR	22	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.5-23 The DEIS notes that "pollutant loadings to surface waters in the project area would be lower than the amounts calculated in this analysis because of existing stormwater treatment facilities". Without data on these existing facilities, this statement is unsupported.	It is reasonable to assume that the stormwater quality facilities are removing at least some of the runoff sediment and associated pollutants and, thus, reducing to some degree the pollutant loads of the highway runoff. A number of studies have documented pollutant removal rates from a variety of types of stormwater treatment facilities. Typical pollutant mean removal rates reported in the literature for wetponds are the following (source: Schuler, T.R., et al., A Current Assessment of Urban Best Management Practices: Techniques for Reducing Nonpoint Source Pollution in the Coastal Zone. Metropolitan Washington Council of Governments: Washington DC; 1992.): Sediment: 74 percent Total Phosphorus: 49 percent Total Nitrogen: 34 percent Total Lead: 69 percent Total Zinc: 59 percent The Tri-County Urban Issues ESA Study-Guidance Document (R2 Resources Consultants, February 2000) states in Section 3.3.2 that stormwater treatment best management practices (BMPs) "are typically capable of capturing 80 percent of total suspended solids, 50 percent of metals and nutrients in particulate form, and 30 percent of dissolved metals or nutrients."
L34	WR	23	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.5-25 The DEIS notes that there are potential regional mitigation measures contained in the I-405 Corridor Draft Fish and Watershed Summary Report. Our review of this report is that several of the projects are not necessarily mitigation measures, rather they are drainage enhancement activities most likely to address flooding and other drainage problems. As such, there is potential for several of these projects to have their own impacts requiring mitigation. Both the local and regional mitigation proposals need to be carefully reviewed before they are credited as mitigation because they may cause their own unmitigated impacts.	During three days of presentations (May 21-23, 2001), 25 speakers from the cities and counties along the I-405 corridor presented stormwater, water quality, and stream and wetland enhancement projects proposed for their respective jurisdictions. Many of these could be considered for basin- or Water Resource Inventory Area (WRIA)-level mitigation, and they were a major source of the information presented in the Fish Summary and Mitigation Report for the I-405 Corridor Program. An advanced mitigation program is proposed to implement some mitigation ahead of the projects proposed for the I-405 Corridor Program. Washington State Department of Transportation (WSDOT) has

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					circulated a draft Proposed Early-Action Environmental Mitigation Decision-Making Process document to aid in choosing advanced mitigation projects. Before committing to specific projects, a review would be made to assure that impacts from proposed mitigation are either avoided or themselves fully mitigated.
L34	WR	24	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Also on this same page, the DEIS proposes a WRIA-wide mitigation program in lieu of within-basin mitigation. We reserve judgement on this approach until there are more details regarding the within-basin and WRIA-wide measures.	Please refer to the response to comment L41.WR-16.
L34	WET	1	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Section 3.5.4 Impact Analysis for Wetlands This entire section does a fairly good job at quantifying impacts to wetlands throughout the project area; however, it fails to discuss these wetland impacts by watershed. A breakout of high and low priority wetlands by watershed and the subsequent number of acres to be filled would be more informative to discern impacts.	A breakout of high and low priority wetlands by watershed by basin has been provided in Table 3.6-8, however, the level of analysis in the EIS is limited to a programmatic approach. Evaluating wetland impacts within individual basins will occur in more detail at the project design level.
L34	WET	2	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.6-17 The DEIS states "stormwater treatment facilities would be designed to meet Ecology, local, and/or WSDOT standards, although substantial storm events would occur and may alter the effectiveness of the facilities. The statement is more realistic than previous statements made regarding stormwater facilities, their effectiveness, and subsequent impacts to surface waters.	Refer to the responses to comments L34.WR-26 and L56.WR-20.
L34	WET	3	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Also on this same page, the DEIS states "as with all alternatives, the relative merits of out-of-kind mitigation would be assessed at the project level and the appropriate mitigation ratio selected". This implies that out-of-kind mitigation may be used for the other action alternatives besides Alternative 2. If this is the intent, the FEIS should explicitly mention this for each alternative, not just Alternative 2.	Section 3.6.5.2 has been revised to make this more clear and complete.
L34	FATE	1	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	3.8 Fish, Aquatic Habitat, and Threatened and Endangered Species The DEIS refers the reader to the I-405 Corridor Program Draft Fish and Aquatic Habitat Expertise Report. We have provided separate comments to this report in Attachment 1.	Thank you for your comment.

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L34	O	6	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	3.8.12 Federal Regulations On page 3.1-1- The DEIS states that "ESA issues would be addressed as necessary during permitting for each project that is ultimately proposed for construction". The problem with this approach is that on a project level scale, cumulative adverse impacts to critical habitat will be ignored and potentially unmitigated.	Adverse effects on critical habitat are evaluated and mitigation is identified in Sections 3.7.4, 3.7.5, 3.8.4, 3.8.5, 3.23.4.4, 3.23.4.5, and 3.23.5 of the I-405 Corridor Program Draft EIS. The same federal resource agencies that will participate in consultation under ESA have participated in identifying and evaluating impacts and mitigation measures throughout the I-405 Corridor Program process. Consultation with these federal resource agencies under ESA will address cumulative effects on critical habitat.
L34	FATE	2	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	On page 3.8-2, there is a brief discussion on the updates to the Sustainable Fisheries Act regarding essential fish habitat. The last sentence in this section implies that essential fish habitat only affects Columbia River dam operations, fish screens at water diversions, and water management. The Essential Fish Habitat requirements are much broader than these three subject areas. The FEIS should be updated with an expanded section on Essential Fish Habitat and how it will apply to each alternative.	An expanded discussion of Essential Fish Habitat (EFH) is included in the Final EIS for the I-405 Corridor Program in Section 3.8.1.
L34	FATE	3	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	3.8.1.4 Indian Tribal Treaty Fishing Rights This section is incorrect and needs to be re-written as follows: In 1854 and 1855, many Indian Tribes in the Pacific Northwest entered into treaties with the United States wherein they reserved the right to fish, hunt, and gather in areas off their reservations. These reserved treaty rights are the "supreme law of the land" and where in conflict with state law are preemptive. Judicial decisions have affirmed that treaty rights have a right to harvest fish free of state interference, subject to conservation principles; to co-manage the fishery resource with the State; and to harvest up to 50% of the harvestable fish. See, United States v. Washington, 384 F. Supp.312 (WD Wn. 1974), aff'd 520 F, 2d 676 (9th Cir. 1975); Washington v. Washington State Commercial Passenger Fishing Vessel Ass'n, 443 U.S. 658 (1979). The study area falls within the recognized and court affirmed treaty fishing areas of the federally recognized Muckleshoot Tribe and Yakama Nation, subject to	The commentor's text has been added to Section 3.8.1.4 of the Final EIS.

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				the limitations on the exercise of those rights as set out in the court decisions. In addition, the federally recognized Snoqualmie Tribe has ancestral ties to the study area, but has no affirmed off-reservation treaty fishing rights. No other federally recognized tribe has an interest in the study area, and no other federally-recognized Indian group has any affirmed fishing rights or other affirmed treaty interest in the study area. The Muckleshoot Indian Tribe has a staff of fisheries biologists, operations two salmon hatcheries, one of which is on a Green River tributary, and has taken an active role in managing salmon in this area.	
L34	FATE	4	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	3.8.3 Affected Environment Page 3.8-3- Green River flows are also affected by the City of Tacoma's municipal water withdrawal.	A statement was added to Section 3.8.3 of the Final EIS that indicates the Green River flows are affected by the City of Tacoma's municipal water withdrawal.
L34	FATE	5	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	3.8-4- In 1994, a bull trout was caught incidentally by Muckleshoot Indian Tribal Fisheries Department staff in the Duwamish (Warner and Fritz, 1997).	Text has been added to Section 3.8.3.1 of the Final EIS indicating that a bull trout was found in the Duwamish River as per Warner and Fritz, 1995.
L34	FATE	6	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Also on this page, the DEIS indicates that chum use "the Green River in the study area only for spawner migration and juvenile out-migration". This statement implies that the study area is not important to chum as a result, which is misleading. First, river conditions are important to the success of adult and juvenile salmonid migration and survival for all species. Second, the statement ignores the fact that the salt wedge in the Green River has moved upstream from his historical location and is now within the study area during some parts of the year. Therefore, juvenile chum may not just be "passing through" the study area, rather they may be using this area for rearing.	Text has been added to Section 3.8.3.1 of the Final EIS noting that because of movements in the Green River salt wedge, some chum rearing is possible within the study area, and that river conditions are important to migration of chum salmon.
L34	FATE	7	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Also on this page, there is a statement about sockeye origination that is attributed to the 1992 Salmon and Steelhead Stock Inventory (SASSI) report. We have two comments about this statement. First, there is information that suggests that sockeye were in Lake Washington prior to the Baker Lake planting program (Several publications from the turn of the century note the sockeye run in Lake Washington (see Evermann and Meek, 1897; Jordan and Evermann, 1896; Rathbun, 1899). Second, the SASSI citation is incorrect. It should read WDFW and WWTT, 1993, since it was authored by the Washington Departments of Fish and Wildlife and the Western Washington Treaty Tribes.	Text has been added to Section 3.8.3.1 in the Final EIS stating that sockeye may have been present before planting programs. The WDFW 1992 SASSI citation now reads WDFW and WWTT, 1994.

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L34	FATE	8	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.8-7 There is a statement that suggests that introduced warmwater fish may prey on juvenile salmon smolts in WRIA 8. There is sufficient evidence from the Lake Washington studies that warmwater species do prey on salmon smolts; therefore, the section should be modified for consistency and include a citation.	The section has been modified for consistency and a citation added to support warm-water fish predation.
L34	FATE	9	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Table 3.8-1 Swamp Creek is in WRIA 8, not WRIA 9 as shown in the Table.	Table 3.8-1 has been corrected to place Swamp Creek in WRIA 8.
L34	FATE	10	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.8-8 The DEIS indicates that Bear, Evans, Soos, and parts of Coal Creek provide the "best salmonid habitat of the study area basins", without providing a citation or any supporting evidence for this statement.	Some basins within the study area were identified as containing particularly valuable salmonid habitat, based on references cited in the Draft Fish and Aquatic Habitat Expertise Report. The primary references include: the preliminary draft sections of the WRIA 8 Limiting Factors Habitat Report, the WRIA 9 Limiting Factors Habitat Report, basin plans, and reconnaissance reports. The Final EIS cites the Expertise Report. Although the analysis identifies the best salmonid habitat, the EIS does not intend to rate or rank the subbasins overall due to the complex interaction of habitat factors and current conditions throughout each subbasin.
L34	FATE	11	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Section 3.8.3 Impacts In general there are a few problems with this entire section. First, the DEIS fails to discuss existing fish passage problems in the study area, including a quantification of these problems by watershed.	Fish migration barriers mapped in WDFW Geographic Information System data are shown in Figure 4.1 of the Fish and Aquatic Habitat Expertise Report and noted in the text. Analyzing these barriers is beyond the level of detail necessary to adequately address programmatic effects.
L34	FATE	12	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Second, the DEIS is inconsistent with information in the Draft Fish and Aquatic Expertise Report in several areas. For example, the expert report mentioned that hydrology is also altered due to an increase in the drainage network that is created when impervious surfaces are created. The DEIS fails to consider this issue and any potential impacts associated with drainage networks construction and/or modification that may cause impacts, too. The FEIS should modify this section to be consistent with the Fish and Aquatic Expertise report.	The following text from the Draft Fish and Aquatic Habitat Expertise Report is added to the Final EIS: Increases in impervious surfaces alter hydrology in several ways, including increased peak flows, decreased base flows, and increased erosion. Conversion to impervious surface speeds runoff and decreases infiltration and evapotranspiration. Urbanization also increases the constructed drainage network and further accelerates the rate of stormwater runoff as it replaces natural drainage channels with numerous gutters, pipes, etc. These developments typically increase the frequency and magnitude of high-flow and flooding events in streams. This increase in peak high flows has been shown to have numerous adverse effects on aquatic habitat and on salmonid habitat in particular including the following (May, 1996):

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					. Gravel that forms spawning habitat is displaced; . Existing salmonid eggs are washed out or crushed; . Benthic macroinvertebrate communities on which salmonids rely for food are degraded; . Channel erosion replaces pool and riffle habitat with less-habitable uniform runs and glides; . Juvenile fish are directly flushed downstream; . Stream flow fluctuation increases. As water runs off more quickly from these urbanized areas, there is typically a corresponding decrease in shallow groundwater recharge. Therefore, base flows are reduced, and water levels may decline much more quickly to levels inadequate for maintaining fish survival through the dry summer season. Overall, severe degradation of stream habitat has been found to occur as impervious surface exceeds about 5 percent of the area in a drainage basin. Rehabilitation of habitat is generally likely to be feasible in streams for which impervious surface occupies less than 20 percent of the basin. Performance of fundamental natural ecological functions is likely to be problematic in streams where impervious surface covers more than 45 percent of their basins (May, 1996).
L34	FATE	13	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.8-8- The DEIS proposes to incorporate the impacts associated with projects under the No Action Alternative. While this approach may be reasonable, the DEIS should still have some discussion about the impacts associated with these projects, both site-specific and cumulatively, as well as mitigation measures proposed for these projects. Without this information, the reader is required to review various previous SEPA documents for all of the jurisdictions within the program area to make such an assessment. This approach is too cumbersome and inappropriate since many of the transportation plans issued a determination of non-significance with little analysis.	Site-specific impacts and mitigation for the No Action Alternative were addressed in previous project-level environmental documentation and can be relied upon in this analysis. Inclusion of the site-specific impacts and mitigation of the No Action Alternative are outside the programmatic nature of this EIS. In addition, cumulative and indirect impacts, including those of the No Action Alternative, are addressed in the Final EIS in Section 3.23.
L34	FATE	14	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.8-9- Our previous comments suggested that the impervious surface analysis in the DEIS is incorrect compared with the Technical reports. If the Technical reports are accurate, then Table 3.8-3 and the associated text that follows will need to be updated in the FEIS.	The only discrepancies found were those reflecting the rounding of numbers in the Draft EIS but not in the expertise report. Therefore impervious surface figures are consistent.

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L34	FATE	15	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.8-13 To our knowledge, no one from the Muckleshoot Indian Tribe Fisheries Department participated in 3-day "fish and basin mitigation" meeting held in May 2001. The FEIS should identify specifically which "Tribes" has representatives there. Furthermore, we have not reviewed the State of Washington's interagency policy guidance for evaluating aquatic mitigation approaches and reserve judgement on this document.	Members of the Muckleshoot Tribe (Isabel Tinoco and Karen Walker) were invited to the Fish and Basin Mitigation Meeting. Response to the invitation was not received and neither attended the May 2001 mitigation meetings. The only tribe attending the meeting was the Kikiallus Nation. The Final EIS text in Section 3.8.5 has been amended to reflect this. WSDOT subsequently met with members of the Muckleshoot Tribe and provided a copy of the interagency policy guidance.
L34	FATE	16	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Sub-basin level Mitigation (pages 3.8-15 through 3.8-20) The project proposals on these pages need much more information before an informed decision can be made. For example, there is a statement that there is high rearing and spawning potential in Swamp Creek, but it is limited by excessive flows without any supporting analysis.	Suggested mitigation measures are listed by jurisdiction and were obtained directly from each local agency. They are intended to be conceptual at this stage in order to indicate the types of known fish habitat limitations that could be addressed during I-405 Corridor Program implementation. WSDOT's "Early Action Mitigation Strategy" sets a framework for implementing broader basin-level mitigation, using the information gathered from the jurisdictions. Detailed, site-specific mitigation will be developed for each project. See response to comment L38.FATE-1.
L34	FATE	17	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 3.8-21 The DEIS should distinguish between mitigation measures required under existing regulations (i.e. retrofitting as part of WSDOT's existing NPDES permit) from measures that may not be currently regulated.	Compensatory measures for construction and operational impacts as discussed in the text are generally required under existing regulations. The measures discussed under Sub-basin Mitigation are generally not specifically required under existing regulations. See response to comment L38.FATE-1.
L34	FL	1	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	3.10-9 With respect to the proposal to use WDFW's 1999 Fish Passage Report as a guidance document for placing culverts and other stream crossing devices, the Muckleshoot Indian Tribe's Fisheries Department has not reviewed this document to determine its ability to protect treaty resources.	Your comment is acknowledged.
L34	FATE	18	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Attachment 1: Specific Comments to the Draft Fisheries and Aquatic Expertise Report (Aug 2001) In general the report is fairly complete and could be improved by addressing the comments noted below. The report should acknowledge that there have not been comprehensive fish use surveys in the corridor program area; therefore, the impacts analysis may be incomplete.	The Draft Fish and Aquatic Habitat Expertise Report acknowledges that fish use surveys in the study area have not been completed or uniformly coordinated. In addition, the analysis is based on conclusions of overall studies rather than exhaustive research of raw data. The level of assessment used in the impact analysis was consistent with the goals of a programmatic EIS.

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L34	FATE	19	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Also, the listing of blocking culverts by basin is the correct approach to discern impacts; however, there is no discussion of who owns these culverts. If WSDOT owns the identified culverts through direct or indirect arrangements, then we expect that these culverts will be fixed as part of this program.	Retrofitting impassable culverts at project locations will be an important consideration of potential project-level mitigation. All passage barriers mapped in the Expertise Report are included in WSDOT's GIS system, which contains barriers inventoried by WDFW, and are not necessarily owned by WSDOT.
L34	FATE	20	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	The report is erroneous with respect to the critical habitat designation for Puget Sound Chinook on page S-1. "Nearly the entire study area has been designated by the National Marine Fisheries Service (NMFS) as critical habitat for Puget Sound chinook salmon." This sentence should note that the entire study area is a subset of the critical habitat designation for Puget Sound Chinook.	The statement is intended to mean that nearly the entire study area is included within designated critical habitat for Puget Sound chinook salmon. Text in the Final EIS has been clarified.
L34	FATE	21	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	The study area is also within Essential Fish Habitat Areas as defined by the updated Magnuson Act.	Essential Fish Habitat established by the Magnuson Act is discussed in the Draft and Final EIS in Section 3.8.1.2.
L34	FATE	22	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	There is a discrepancy between the analysis in the DEIS and the Draft Fisheries and Aquatic Expertise report. The Draft Fisheries and Aquatic Expertise report considered several impacts to streams including the number of stream crossings, number of specific locations where construction is proposed within 300 feet of streams, and the amount of new impervious surface. This approach was not used for the DEIS, rather it only considered impervious surfaces and is incomplete. The FEIS should include an expanded analysis section based on the Expertise report and not the analysis in the DEIS.	The same impact analysis approach to streams was used in the Draft EIS as in the Technical Expertise Report. Both impervious surface and "riparian encroachments," were used to analyze effects to streams. Riparian encroachments are defined graphically as any disturbance within 300 feet of a stream, including proposed stream crossings or other disturbance such as road segments paralleling a stream.

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L34	FATE	23	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	3.2.1 Federal Regulations. As noted in our comments to the DEIS, we do not support addressing the ESA issues at the project permitting level because there is a great potential the cumulative impacts will be ignored.	Cumulative impacts to ESA species are addressed in Section 3.23 of the Draft and Final EIS. The cumulative impact assessment is based largely on the 2001 updated Metropolitan Transportation Plan and the Puget Sound Regional Council 20-year modeling projections of population and employment. The proposed near-term and early-action mitigation efforts by WSDOT during this environmental process serve to identify and mitigate during implementation potential cumulative impacts to each ESA species. This EIS process and issuance of the corresponding Record of Decision (ROD) is not an action that requires formal consultation under the ESA. However, FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for consultation on a programmatic level.
L34	FATE	24	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Also, the Technical section on ESA is better than the cumulative effects section in the DEIS and should be used instead.	ESA cumulative effects language from the Fish and Aquatic Habitat Expertise Report has been added to Section 3.23.4.5 of the Final EIS.
L34	FATE	25	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	3.2.2 State and Local Regulations As noted in the DEIS, there are local regulations that will apply that were not considered in the DEIS and should be. Due to variations in the regulations, not all areas would be protected similarly.	At a minimum, all federal and state regulations will be followed. Several layers of regulation and policy guidance will shape each of the individual projects, including local regulations. Detailed application of the local regulations will be prepared at project permitting because each jurisdiction, especially in this corridor, is considered to have similar environmentally protective regulations slanted to the particular needs of the jurisdiction.
L34	FATE	26	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	3.2.3 Indian Tribes This section should be updated based on our comments to the DEIS under Section 3.8.1.4.	The Final EIS has been revised as noted in response L34.FATE-3.
L34	FATE	27	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	4.1.1.2 Green/Duwamish Watershed This section is missing the fact that the Green River is used by the City of Tacoma for municipal water supply purposes. If it is relevant to mention the City Seattle's municipal use of Cedar, then it is relevant to mention Tacoma's use, too.	A statement has been added to the Final EIS that indicates the use of the Green River by the City of Tacoma for municipal water supply.

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L34	FATE	28	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-2- The Report states "before 1916, the Cedar River discharged directly to the Black River, and Lake Washington discharged to the Duwamish through the Black River. The Duwamish was formed by the confluence of the Green and Black rivers. The Black was a short, low gradient river by which Lake Washington and the Cedar River drained to the Duwamish, and the Lake had no other outlet." This description is more accurate than the way it is described in the Cumulative Effects Section in the DEIS and should be used instead.	The commentor's suggested language has been summarized and substituted into the Final EIS, Section 3.23.4.3.
L34	FATE	29	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-2- The report states "In addition, the Cedar River was artificially diverted from the Green River to supply additional water through Lake Washington for operation of the new Ballard Locks. This statement is partially correct. According to the WRIA 8 Limiting Factors report, "the Cedar River was redirected from its normal connection with the Black River, which had fed the Duwamish, and was channelized to flow into Lake Washington, with the initial hope of creating a major freshwater industrial port at Renton" (Kerwin, 2001).	Text in Section 4.1.1.3 of the Fish and Aquatic Habitat Technical Expertise Report has been replaced to state that "the Cedar River was redirected from its normal connection with the Black River, which had fed the Duwamish, and was channelized to flow into Lake Washington, with the initial hope of creating a major freshwater industrial port at Renton (Kerwin, 2001)."
L34	FATE	30	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-2- The report states "lowering of the Lake Washington water levels had substantial effects on the hydrology of the entire watershed. Before that time, the Sammamish River had been a meandering, low-gradient stream that frequently occupied its floodplain, and supported an extensive complex of mature forested wetlands. The lowering of Lake Washington increased the River gradient and flow, effectively draining many of the Sammamish River wetlands (King County, 1993; King County, 2001)". This last sentence ignores the fact that the U.S. Army Corps of Engineers and King County dredged and filled the Sammamish River, effectively reducing its length by 12 miles, in addition to the lowering of Lake Washington.	A statement has been added in Section 4.1.1.3 of the Fish and Aquatic Habitat Technical Expertise Report that the U.S. Army Corps of Engineers and King County dredged and filled the Sammamish River, effectively reducing its length by 12 miles, in addition to the lowering of Lake Washington.
L34	FATE	31	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-2- The report states "channelization-induced changes in flow velocities may directly interfere with both upstream and downstream fish migration by flushing juvenile fish rapidly downstream, and eliminating resting areas for migrating spawners." This statement is missing citations to support it.	The citation that has been added is May, 1996.

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L34	FATE	32	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Table 4.1: Baseline Impervious Area by Basin This table needs to be expanded to include the action alternatives too.	Impacts of the action alternatives are included in the impact analysis section. The information requested can be found in Table 5-2 on page 5-11.
L34	FATE	33	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-8- The WDFW, 1992 citation is incorrect. It should read "WDFW and WWTT, 1993".	The WDFW 1992 SASSI citation has been changed to WDFW and WWTT, 1993.
L34	FATE	34	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-10- The report states that "sockeye occupy Lakes Washington and Sammamish". Sockeye have also been observed in limited numbers in the Green River by MITFD staff.	Language has been added as an amendment to the Technical Expertise Report to indicate that sockeye have been observed in limited numbers in the Green River by Muckleshoot Indian Tribal Fisheries Department Staff.
L34	FATE	35	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-10- The report states "these sockeye originated from non-native stock introduced from Baker Lake in northwestern Washington (WDFW, 1992). Within the study area, they occur in the Cedar River, Sammamish River, and North, Swamp, Little Bear, Bear, Coal and May creeks". As noted previously, there were native sockeye in WRIA 8 prior to the Baker Lake introductions. Several publications from the turn of the century note the sockeye run in Lake Washington (Evermann and Meek, 1897; Jordan and Evermann, 1896; Rathbun, 1899). Evermann and Meek (1897) also provide anecdotal evidence of large sockeye runs through the Sammamish River.	Additional language has been added to Section 4.1.2.4 of the Fish and Aquatic Habitat Technical Expertise Report that indicates there were native sockeye in WRIA 8 prior to the Baker Lake introductions and cites several publications (Hendry 1995 as reported by Kerwin, 2001).
L34	FATE	36	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-10- The report states that with respect to kokanee, "these occur in Lake Washington, and have been reported to spawn in a number of study-area tributaries including Juanita, Bear, and Swamp creeks". Please provide a citation to support this statement.	Text has been changed to read (per WRIA 8 Habitat Limiting Factors Report): Kokanee are sockeye salmon that spend their entire life cycle in fresh water lakes without migrating to salt water. These occur in Lake Washington and Lake Sammamish, and have been reported to spawn in a number of study-area tributaries including Swamp, Little Bear, Bear, and Issaquah creeks (Kerwin 2001). The following reference has been added: Kerwin, J. 2001. *Salmon and Steelhead Habitat Limiting Factors Report for the Cedar-Sammamish Basin (Water Resource Inventory Area 8)*. Washington Conservation Commission. Olympia, WA.

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L34	FATE	37	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-10- The report states "resident cutthroat trout are widespread in small streams throughout the study area, including areas above migration barriers (May, 1996)." First, resident trout are wide-spread in these watersheds, not just above migration barriers. Second, the statement should be modified to say that resident trout are above migration barriers for salmon.	Text has been amended to indicate that coastal cutthroat trout are found "throughout" the study area watersheds, not just above migration barriers. The text was also changed to indicate that migration barriers are those specific to salmon.
L34	FATE	38	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-11- "Smallmouth and largemouth bass in particular have been found to consume substantial numbers of outmigrating salmonid smolts in Lake Washington and the Ship Canal." Please include a citation with this statement.	The Final EIS has included a citation (Tabor and Footen, 2000) for this statement, "Smallmouth and largemouth bass in particular have been found to consume substantial numbers of out-migrating salmonid smolts in Lake Washington and the Ship Canal." The full citation for the reference section is: Tabor, R., and B. Footen, 2000. *Predation of Juvenile Salmon by Littoral Fishes in the Lake Washington-Lake Union Ship Canal, Preliminary Results.* Prepared by U.S. Fish and Wildlife Service and Muckleshoot Indian Tribe. Lacey, WA and MIT, Auburn, WA, respectively.
L34	FATE	39	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-11 – The report states "the North Lake Washington Basin is defined here as occupying 1,079 acres in the western edge of the study area west of Swamp Creek (Figure 4.1). The basin lies largely within the City of Bothell, and lies entirely within the Urban Growth Area. The basin is drained by one main stream discharging to Lake Washington (King County, 1987)". It is unclear as to which stream the last sentence is discussing. Please provide a stream number from Williams et. al (1975) if possible.	The "stream" in the following sentence has been identified as stream # 08-0056 (Williams et al., 1975), "the North Lake Washington Basin is defined here as occupying 1,079 acres in the western edge of the study area west of Swamp Creek (Figure 4.1). The basin lies largely within the City of Bothell, and lies entirely within the Urban Growth Area. The basin is drained by one main **stream** discharging to Lake Washington (King County, 1987)".
L34	FATE	40	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-13 4.2.5 Juanita Creek Basin The report discusses salmonid use in this basin as follows. "Sockeye and coho salmon, as well as steelhead use Juanita Creek. The stream is also inhabited by coastal cutthroat trout including sea-run cutthroat trout (Watershed Company, 1998)". The report fails to note that chinook also have been documented in Juanita Creek. Please see http://dnr.metrokc.gov/Wrias/8/fish-maps/chinook/	Text changes will show that chinook are documented in Juanita Creek as per the King County WRIA 8 Chinook distribution map.

Code Number			Name	Comment	Response
L34	FATE	41	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-14 – The report states "the mainstem Sammamish is underlain almost entirely by silty substrate that limits spawning habitat, and rearing habitat is limited by sparse large woody debris and a nearly complete absence of pools (King County, 2001). This statement generally describes the current conditions of the Sammamish River; however, it does not take into account the potential for spawning to occur at the mouths of larger tributaries.	The commenter can find information about spawning at the mouths of larger tributaries in applicable sections of the Draft Fish and Aquatic Habitat Expertise Report (4.2.2 Swamp Creek, 4.2.3 North Creek, 4.2.4 Little Bear Creek, 4.2.8 Bear Creek, and, 4.2.9 Evans Creek).
L34	FATE	42	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-16 4.2.11 Kelsey Creek Basin The report states that "coho salmon, steelhead, and coastal cutthroat trout use Kelsey Creek (May, 1996)". The report fails to note that chinook use Kelsey Creek too- see http://dnr.metrokc.gov/Wrias/8/fish-maps/chinook/.	Text will note that chinook are documented in Kelsey Creek as per the King County WRIA 8 chinook distribution map.
L34	FATE	43	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-16 4.2.12 Mercer Slough (South Kelsey Creek) Basin There may be a discrepancy between the text for barriers and the map. The text mentions three fish migration barriers; however, the map shows five, including four attributed to the Mercer Slough. Also Sturtevant Creek is used by coho salmon (Williams, et al., 1975). Also there are more recent chinook sightings in the basin than those mentioned in the report. Please see http://dnr.metrokc.gov/Wrias/8/fish-maps/chinook/.	The text notes five migration barriers in the last sentence of the first paragraph of page 4-17, which correspond to the numbers indicated on the map. The presence of coho in Sturtevant Creek (Williams et al., 1975) is also noted in the last sentence of the last paragraph of page 4-16. More recent chinook sightings in the basin than those currently mentioned in the report are cited per the WRIA 8 chinook distribution maps.
L34	FATE	44	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-17 4.2.13 West Lake Sammamish Basin The report states "fish populations in most of the small streams in the basin are likely limited to cutthroat trout (King County, 1987). Non-salmonids including sculpins are also likely to inhabit some streams. Coho salmon may access the lowest reaches of some of these small streams, but I-90 crossings have essentially eliminated nearly all anadromous use upstream of the highway (King County, 1987b)." There is more recent information, please see http://dnr.metrokc.gov/Wrias/8/fish-maps/chinook/. Also there is a blockage on Lewis Creek due to I-90.	The report states "fish populations in most of the small streams in the basin are likely limited to cutthroat trout (King County, 1987). Non-salmonids including sculpins are also likely to inhabit some streams. Coho salmon may access the lowest reaches of some of these small streams, but I-90 crossings have essentially eliminated nearly all anadromous use upstream of the highway (King County, 1987b)." This statement has been updated to reflect the latest information from the WRIA 8 steering committee, including "Fish populations in most of the small streams in this basin are dominated by cutthroat trout and sculpins, but the streams are also utilized by coho salmon and kokanee (Kerwin, 2001)."
L34	FATE	45	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-17- The report states that "Coal Creek is used by coho and sockeye salmon, and rainbow and cutthroat trout (King County, 1987c). There is more recent information available, please see http://dnr.metrokc.gov/Wrias/8/fish-maps/chinook/	The text has been changed to reflect new information from WRIA 8.

Code Number			Name	Comment	Response
L34	FATE	46	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	4.2.15 May Creek Basin The report states that "spawning escapement of all anadromous salmonids has declined in May Creek, most dramatically for wild coho salmon". The report needs a citation to support the statement for both numbers and "wild" component.	The EIS and the Errata and Addendum for the Draft Fish and Aquatic Habitat Expertise Report states that "spawning escapement of all anadromous salmonids has declined in May Creek, most dramatically for wild coho salmon". A citation has been provided for this statement.
L34	FATE	47	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-19 4.2.16 Lower Cedar River Basin The report states that "the lower six miles of Cedar is part of the project area. Spawning and rearing habitat are limited in this reach, but all anadromous species must migrate through it to the extensive habitat in upstream portions of the watershed". This statement contradicts recent information about chinook redd distribution on the Cedar River. In 1999, multi-agency staff conducting adult surveys found 19% of the redds were observed below River Mile 6.5 which may actually underestimate the number of redds from River Mile 1.0 to 5.3 due to less sampling effort (Mavros et al. 2000). From initial data, it appears that the lower six miles of the Cedar River is important for spawning chinook and is likely important for other salmonids.	The text in the Final EIS and the Errata and Addendum to Expertise Reports has been changed in light of the new information supplied by the commenter about chinook redd distribution in the Cedar River. The text has been changed to indicate that in 1999, multi-agency staff conducting adult surveys found 19 percent of the redds below River Mile 6.5, which may actually underestimate the number of redds from River Mile 1.0 to 5.3 due to less sampling effort (Mavros et al. 2000). From this data, it appears that the lower six miles of the Cedar River are important for spawning chinook and are likely important for other salmonids.
L34	FATE	48	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-19- The report states that "no fish hatcheries are present in this basin, but fine sediment deposition, water quality problems, and lack of pools and cover have severely limited habitat value in this reach for salmonid life stages other than migration (King County, 1993), but hatchery stock coho and chinook salmon have been frequently released, and the large sockeye run in this river was created from introduced sockeye after the River was diverted to Lake Washington in 1916 (King County, 1993). As noted previously, there were sockeye in WRIA 8 prior to the Baker Lake introductions. Several publications from the turn of the century note the sockeye run in Lake Washington (Evermann and Meek, 1897; Jordan and Evermann, 1896; Rathbun, 1899). And a few, such as Evermann and Meek, provide anecdotal evidence of large sockeye runs through the Sammamish River as well.	Please refer to comment response L34.FATE-35.
L34	FATE	49	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-19- Molasses and Madsen creeks support primarily resident cutthroat trout populations. Madsen and potentially Molasses still contain coho. Please see http://dnr.metrokc.gov/Wrias/8/fish-maps/chinook/	Text has been changed to indicate that coho, sockeye, and cutthroat trout are documented in Madsen and Molasses Creeks per the King County WRIA 8 distribution maps. Citations have been updated to reflect new information from the WRIA 8 steering committee.

Code Number			Name	Comment	Response
L34	FATE	50	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-19 4.2.17 Soos Creek Basin The report states "the tributaries Covington and Jenkins creeks had the most abundant fish habitat". Please provide a citation and/or data to support this statement.	Please refer to comment response L34.FATE-10.
L34	FATE	51	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-19- The report states "the Black River is a short stream that had drained Lake Washington before flow was diverted as described in Section 4.1.1 of this document. This statement should be expanded as follows: The initial opening of the Locks lowered Lake Washington from an average of 9.1 m (29.8 feet) above MLLW of Puget Sound to the present average lake elevation of 6.4 m (21.0 feet) above MLLW (Chrzastowski, 1983). Since the Black River averaged only 1.2 m deep it was dewatered and was replaced by the Locks as the lake's outlet.	Text in the Final EIS and the Errata and Addendum to Expertise Reports has been expanded to address the comment as follows: The initial opening of the Chittendon Locks lowered Lake Washington from an average of 9.1 m (29.8 feet) above MLLW of Puget Sound to the present average lake elevation of 6.4 m (21.0 feet) above MLLW (Chrzastowski, 1983). Since the Black River averaged only 1.2 m deep, it was dewatered and was replaced by the locks as the lake's outlet.
L34	FATE	52	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	4.2.19 Lower Green River Basin Page 4-21- The report states "two hatcheries upstream of the study area, near the Green River on Soos Creek and Crisp Creek, produce summer/fall chinook, chum salmon, and steelhead, respectively". The report should also note that both hatcheries also produce coho.	The text has been changed to indicate that the two hatcheries upstream of the study area near the Green River also produce coho.
L34	FATE	53	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-21- The report states "land clearing and development in upstream areas has increased sediment loading and water temperature in the on-site reach". This statement ignores the significant impact that water withdrawals (both surface and ground) has had on water temperature and wood removal programs and on-going levee maintenance activities that keep trees from growing and wood from entering the channel to retain sediment.	A sentence has been added to further clarify that, "Additional factors potentially influencing elevated water temperatures documented in the Green River basin include surface and groundwater withdrawals, loss of riparian vegetation, and increases in impervious surface. Maintenance activities along the levee system continue to impact both river temperature and potential large woody debris recruitment."
L34	FATE	54	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 4-21- The lower watershed has been substantially adversely affected by a history of toxic industrial pollution including PCBs and metals, and the Duwamish reach immediately downstream of the project is proposed as a federal Superfund site for hazardous waste remediation (Jackson, 2000). Remediation by removal or capping of contaminated areas has been undertaken in several areas, and water quality has improved substantially due to improving wastewater treatment and industrial effluent regulation (King County, 2000). These statements appear to conflict. If water quality is substantially improved, then it seems that the Duwamish River wouldn't qualify as a Superfund site.	Water quality in the Duwamish River has improved, yet it still qualifies as a potential EPA Superfund site. This statement may appear to be a contradiction; however, it is true.

Code Number			Name	Comment	Response
L34	FATE	56	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 5-1- The report states "operational impacts are direct impacts caused by the existence of the project and will perpetually affect the resource. In this analysis, potential direct operational impacts area measured by the area of new impervious surface". The creation of new impervious surfaces is not the only direct impact that will occur. Operational impacts also include the permanent fragmentation of riparian areas, channelization and riprap, culvert placement and the permanent loss of wood recruitment potential to a widened roads and maintained shoulders, right of ways. All of these impacts are caused by the existence of the project and will likely perpetually affect the resource.	See response to comment L41.FATE-4. This response explains that impervious surface is a good general indicator of numerous types of operational impacts at the programmatic level. Additional discussion has been provided in the Final EIS Section 3.8.
L34	FATE	57	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	For most analyses of critical resources, year 2030 was selected as the future temporal boundary for the program. If 2030 is the appropriate time frame per the DEIS, then the report and the DEIS should identify the watersheds that will have mature timbers growing within them capable of recruiting to streams by then. The scientific literature considers 50-100 years for a tree to mature to capable of recruitment.	The year 2030 was chosen as the temporal boundary for consistency with regional planning documents. The study area is primarily urban/suburban, and riparian forests are fragmented. Although most of the watersheds include some patches of mature riparian forest, a detailed mapping is not available and is beyond the scope of this programmatic analysis. Additional discussion of plant communities is included in the terrestrial wildlife section.
L34	FATE	58	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Table 5.1: Riparian Encroachments Impacts by Basin This table should include the No Action Alternative, particularly because this impact was likely not considered by previous environmental analyses.	Table 3.8-2 in the EIS provides encroachments for the No Action Alternative.
L34	FATE	59	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 5-2- The report states "fish populations are limited by low base-flow water levels during the dry season in many small streams". This statement implies that only small streams have low flow problems. Salmonid populations are limited by flows in Bear and Soos Creek, and the Cedar and Green Rivers to some extent. The report needs to consider flow as one limiting factor.	Section 3.8.3.1 of the Final EIS indicates that salmonid populations are limited by flows in Bear and Soos creeks and in the Cedar and Green rivers to some extent.

Code Number			Name	Comment	Response
L34	FATE	60	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 5-12– The report states "overall, severe degradation of stream habitat has been found to occur as impervious surface exceeds about 5 percent of the area in a drainage basin. Rehabilitation of habitat is generally likely to be feasible in streams for which impervious surface occupies less than 20 percent of the basin. Performance of fundamental natural ecological functions is likely to be problematic in streams with impervious surface covering more than 45 percent of their basins (May, 1986)". We have two comments about these statements. First, the citation for May (1986) is incorrect. It should read May, 1996. Second, if these statements are true and all but one of the impacted basins are at or greater than 20% impervious surfaces, then it seems logical to conclude that the project will add to existing degraded habitat conditions and will likely to reduce salmonid production. The result is a great potential to limit the Tribe's treaty-protected resources. The report should identify what are the existing impervious surface conditions without the baseline projects of the No-action alternative.	The citation for May (1986) has been corrected to read May (1996). Basins in the study area are likely to have been impacted far beyond the phase of "rapid degradation" in which most of the loss of fishery habitat resources would occur. Further impacts would be expected to add only incremental habitat degradation. Inclusion of impacts from the No Action Alternative as part of the baseline conditions is fundamental to the analysis, because these impacts will occur regardless of the I-405 alternative chosen.
L34	FATE	61	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 5-17- The report should discuss the analysis used to determine the number of encroachments. Also, part of this analysis should discuss why Alternative 2 has more impacts than Alternative 3.	Impacts analysis is discussed in Section 3.1.2 of the expertise report. A discussion of why Alternative 3 adds less impervious surface than Alternative 2 is included in the Final EIS Section 3.8.4.
L34	FATE	62	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 5-20 – 5.3.3.3 Cumulative Impacts The report states "the transportation programs included in Destination 2030, including I-405, I-5, and Trans-Lake Washington programs, are expected to increase pressure for growth along major transportation corridors within the UGA, thus relieving pressure and reducing adverse effects on the rural areas that contain the most functional fish habitat". The report should provide a citation for the contention that the most functional fish habitat occurs in rural areas for all salmonid species at all life history stages.	The EIS statement quoted by the commenter does not specifically contend that rural areas contain the best fish habitat for all species and life stages. Rather this general statement contends that less-urbanized areas generally have less-degraded stream habitat. This is supported by May (1996) findings regarding effects of impervious surface, as well as numerous basin plans including Bear Creek and Soos Creek.

Code Number			Name	Comment	Response
L34	FATE	63	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 6-1- The report states 'controlling storm-water runoff according to the Stormwater Management Manual for Western Washington (Ecology, 2000) or the most current revision of that document will minimize water quantity and quality impacts of the proposed project. Detention and/or infiltration ponds should be employed to control storm-water runoff in order to improve water quality and attenuate peak flow discharges. Storm-water facilities should be designed in accordance with local regulations, which generally require that peak hourly storm-water flows be held to or below pre-development levels. This minimizes erosion and sedimentation resulting from increased peak flows. The I-405 Corridor Program Draft Surface Water Resources Expertise Report (CH2M HILL, 2001) has recommended infiltration of stormwater in specific areas with suitable geology. This would not only control excessive peak flows, but would potentially recharge base flow groundwater sources that sustain fish habitat during the dry season. The impacts identified above do not consider other potential adverse impacts to salmonids due to stormwater.	Page 5-12 of the expertise report presents a discussion of potential adverse impacts to salmonids from stormwater, including: displacement of spawning gravel, scouring of salmonid eggs from redds, disruption of benthic macroinvertebrate communities, channel erosion and loss of diverse channel habitat, displacement of rearing juveniles, and increased stream flow fluctuation. ESA issues including reversibility of resource commitments will be addressed in forthcoming ESA documents including programmatic or project-level biological assessments.
L34	WR	25	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Surface Water Report Comments The impervious surface acreage values in the text of the summary section and the first table summary do not match for Alternative 1, i.e. narrative indicates 164 acres, table indicates 123 acres).	The 123 acres listed in Summary Table on page 2 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report is a typographical error. The correct number is 164 acres.
L34	WR	26	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 58- Thorough maintenance has been difficult along the I-405 corridor due to lack of funding. Equipment needs of the WSDOT Maintenance Office are not met, and it is difficult to find and keep qualified personnel (Phil George, personal communication, 2001). These statements suggest that mitigation may not be successful due to limited funding. The FEIS should discuss this issue in detail.	Washington State Department of Transportation (WSDOT) is committed to providing adequate levels of maintenance for its stormwater treatment facilities. Emphasis is being placed upon installing good-performance treatment facilities that require limited maintenance. Grass strips are one approach. WSDOT is funding research on other promising stormwater treatment methods including soil amendments to minimize runoff, shoulder infiltration (ecology shoulders), proprietary treatment devices, selective adsorption/exchange materials, and precipitation (personal communication with Ed Molash, WSDOT Olympia Office, December 3, 2001). WSDOT acknowledges that long-term maintenance of its existing and future stormwater treatment facilities will be a major challenge to highway operations.

Code Number			Name	Comment	Response
L34	WR	27	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 68- The report states "the above figures represent potential pollutant loading before stormwater treatment measures. Standard water quality treatment can reduce 80 percent of the suspended solids and COD and 40 to 60 percent of the metals and nutrients present in road runoff. As shown in Figure 3.1, there are a number of stormwater treatment facilities currently installed along I-405. Although their effectiveness in reducing overall highway pollutant loads has not been quantified regionally, actual pollutant loadings to the surface waters in the project area would be lower than the figures shown above."	See response to comment L34.WR-22.
L34	WR	28	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Again, there should be quantified regional data to determine actual pollutant loadings with treatment either from WSDOT or other agencies.	See response to comment L34.WR-22.
L34	WR	29	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Page 80 – The report states that "given the relatively slow rate of large scale redevelopment typical of existing urbanized areas and the difficulty of incorporating effective stormwater control measures in densely developed areas, it is unlikely that the hydrologic conditions of the urbanized portions of streams in the study area will greatly improve within the 2030 timeframe. With continued growth in the study area, it is likely that stream conditions in the I-405 corridor will continue to decline". Again, we would agree this assessment and would extend this argument to the potential impacts to salmonids that will likely occur (i.e. continued degraded habitat) which will likely affect production and the Tribe' 'ability to exercise its treaty rights.	Thank you for your comments regarding stream conditions and impacts to salmonids. Please also refer to Section 3.8.1.4 of the Final EIS.

Code Number			Name	Comment	Response
L34	SH	1	Isabel Tinoco Agency: Muckleshoot Indian Tribe Fisheries Department	Shorelines report This report quantifies the amount of shoreline that may be affected by various projects under Alternative 1, many of which will be constructed under the other alternatives. The report also indicates that any fish and fish habitat impacts were addressed in the Aquatic and Fish report. We disagree. The quantification of shoreline area was not discussed in the Draft Aquatic and Fisheries report, nor the relevant section of the DEIS and should be. As noted in the shoreline report, the impacts to shorelines will typically be due to filling; an activity not considered in the fisheries report. As it stands, the DEIS fails to fully quantify as many impacts as could be assessed in this programmatic approach. Finally, the report should discuss whether or not a riparian encroachment is the same as fill.	Riparian encroachment includes all disturbances, including clearing or grading as well as fills, in and adjacent to riparian systems. Because shorelines are adjacent to riparian systems they would inherently be included within 'riparian encroachments." Section 3.8 of the Final EIS explains how riparian encroachments relate to fish habitat impacts.
L35	ALT	1	William Eager 615 2nd Ave, Suite 680 Seattle, WA 98104 Agency: Public	WSDOT and its study team should be congratulated on a corridor study that is among the best transportation planning efforts done in this Region for some time. I am highly supportive of Alternative 3, not only because it meets the project's need to "... improve personal and freight mobility and reduce foreseeable traffic congestion... ", but it also improves mobility for the region as a whole. This latter point is often missed by those reviewing the results and leads some to the conclusion that '... it's hopeless- if you build more capacity it just fills up with cars.'	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L35	TR	1	William Eager 615 2nd Ave, Suite 680 Seattle, WA 98104 Agency: Public	The travel estimating models, such as those used in this project, try to represent reality, but in doing so produce results that may be hard to fully understand. That is because the estimating model responds to proposed new capacity (such as additional lanes on I-405) by assigning additional trips both from within the corridor and from the region. The number of additional trips depends on the amount of new capacity. For example, improvements to I-405 may make it more attractive to some drivers currently using I-5, which is outside the study corridor. As a result, each alternative is trying to solve a slightly different problem because there is not a fixed number of trips that will be assigned.	The Puget Sound Regional Council (PSRC) modeling process does capture the increased attractiveness of the I-405 corridor if transportation improvements are made since increased capacity will improve speeds and reduce travel time relative to alternative corridors such as I-5. This effect is captured in the trip distribution and traffic assignment steps in the modeling process. The modeling process assumes that origins and destinations (O-Ds) of trips will change if the relative travel time between various O-D pairs changes. The theory underlying the model is that drivers will seek the shortest path between origins and destinations and as the street and highway network become congested, traffic

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				An example of this is presented by the projected vehicle hours traveled (VHT) as shown on Table 3.23-8, page 3.23-43 of the DEIS. The "Study Area" column under VHT shows that daily VHT increases with the alternatives that provide more capacity. That leads some to conclude, erroneously, that building more road capacity is useless because it just fills up with new traffic and hours of travel increase. However, this is not new traffic. It is other regional traffic attracted to the corridor because of the improved capacity. The figure below illustrates this. (see figure in original correspondence) It shows the change in hours of travel by alternative both within the study area and within the Puget Sound Region. Within the study corridor, hours of travel increase with the higher capacity alternatives. However, for the region, hours of travel decrease with the higher capacity alternatives. For example, hours of travel within the study area increase by 14,000 hours per day for Alternative 3, but for the overall region hours of delay decrease by 41,000 daily hours. This shows that Alternative 3 is not only serving the needs of the I-405 corridor, but is also helping with other regional needs by attracting traffic from other, now more-congested locations. For Alternative 3, there is an overall net benefit to the region of 27,000 daily hours saved, in addition to the reduced congestion and improved speeds in the I-405 corridor. While the model is being realistic in assigning other regional trips to corridor when capacity is available, the results also illustrate a serious problem in considering corridor improvements without the context of an overall regional program of improvements. It's unfortunate that, in spite of PSRC's claims, Destination 2030 does not provide that regional program of congestion reduction improvements.	will continue to seek the minimum path until the system reaches "equilibrium." The total number of trips in the region is assumed to be fixed under all alternatives but how the trips are distributed and the paths that travelers choose are a function of relative travel times. Please note that some diversion from I-5 to an improved I-405 is a reasonable forecasting result since no major capacity improvements are planned in the I-5 corridor, as reflected in the MTP where no major I-5 improvements have been included. If additional capacity is provided in the I-405 corridor, additional future year travel is expected to be accommodated within the corridor. Overall vehicle hours of travel would go up in the corridor but due to the higher speeds, VHT would be reduced overall in the region. This is the reason why both corridor and regional VHT estimates are reported.

Code Number			Name	Comment	Response
L36	TR	1	William Eager 615 2nd Ave, Suite 680 Seattle, WA 98104 Agency: Public	I anticipate that one of the comments you may receive on this very well executed corridor study is that "It's a waste of time to build new roads, because they just fill up with traffic". I would like to provide a counter to that notion. Road opponents use this "It will just fill up" myth with the implication that there is an insatiable demand making road expansion fruitless. In fact: 1. The Puget Sound region's major highway network was largely completed by 1970. The last leg of I-90, completed in the 1980's was an exception; but it added less than 3% to our region's lane-miles of freeway. Congestion didn't become noticeably bad until the late '80's and early 90's. That means it took about 20 years for our road capacity to be used up – that's not a bad planning horizon for transportation improvements. 2. We have neglected our highway system for about three decades. During this same period and in spite of our neglect, increases in population and in the amount of travel per person have made travel demand triple. (Figure 3.23-14 on page 3.23-41 of the DEIS illustrates this comparison but for a shorter 1982 to 1998 period). If we were now to make capacity improvements to a few of our roads, why should we be surprised if traffic was attracted to those new roads? SOME OF THIS NEW TRAFFIC WOULD COME FROM NEIGHBORHOOD STREETS WHICH HAVE HAD TO ABSORB THE CONGESTED FREEWAY TRAFFIC OVERFLOWS. Other traffic growth will be generated by projected growth in population and jobs. 3. A University of California study is often cited by highway opponents in support of the "It will just fill up" myth . Those that use this report to suggest that new traffic just appears probably haven't read the details of the study. In fact, the authors acknowledge that new lane-miles were a minor contributor to growth in VMT [vehicle miles traveled]. They go on to say, "Figure 3 shows that population growth [emphasis added] is the most consistent contributor to VMT growth."	Please refer to the response to comment E66.SOL-1 for a discussion of induced travel effects.

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				4. If it were true that "Build it, and they [more cars] will come", the corollary should be "Don't build it and they won't come". Figure 3.23-14 on page 3.23-41 of the DEIS shows the opposite: we didn't build more roads and the traffic increased anyway. That shows the reality that these new trips were important to those people making the trips. Travel increases serve real, legitimate purposes and are not just frivolous efforts on the part of the public to use up whatever capacity there may be. Even if a new road did fill up with traffic, what's the problem? A new library will fill with books and readers. But building the library didn't cause the author to write or the reader to read. If the road were to fill with traffic, that's because new and existing population had a reason to go somewhere. Is up to some government agency to decide which trips are important? Throughout civilized history, one of society's goals has been to increase mobility, not restrict it. When was it we decided this should no longer be true?	
L36	ALT	1	William Eager 615 2nd Ave, Suite 680 Seattle, WA 98104 Agency: Public	WSDOT has done an exemplary job on this corridor study, and Alternative 3 is a cost-effective solution to the corridor's needs. I strongly support Alternative 3. Thank you for the opportunity to comment.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L37	O	1	Mark Lostrom 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	The City of Medina is within the proposed study area boundary, and therefore is affected by all decisions related to the NEPA/SEPA Draft I-405 Corridor Program EIS. The Planning Commission of the City of Medina supports our city council and city government in responding to such proposals. We have carefully reviewed all the subject material and would like to submit the following comments:	Thank you for your comment.
L37	O	2	Mark Lostrom 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	The draft discusses various alternatives that will take 15-20 years to implement. Given a project of this magnitude, we believe there is not sufficient detail regarding construction plans and schedules, mitigation possibilities, direct and indirect impacts to the communities involved, etc. We would hope additional details are provided in a further response period.	Please refer to the response to comment L28.O-2.

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L37	TR	1	Mark Lostrom 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	The draft does not appear to recognize and coordinate with, other significant transportation programs being discussed at this time. As an example, it appears to us that there should be a close linkage with this draft and the 520 Interchange/Bridge study to ensure a total transportation solution that addresses all related problems.	The analysis was stratified by sub-basin in order to allow more specific baseline description and impact assessment. Effects are described more broadly in Section 3.23, Cumulative and Secondary Effects.
L37	TR	2	Mark Lostrom 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	The draft does not address the issue of traffic flow during the lengthy construction period. This is a major concern to our small community because there is a possibility of substantially increased traffic detoured through Medina. We believe a critical part of any future plans should address how traffic will be managed to avoid a negative impact on our city and similar cities in the corridor. This is a critical quality-of-life issue that deserves more attention.	See the response to comment L37.TR-1. Further construction impact mitigation is documented in the FEIS, Section 3.12.5.1. A traffic mitigation plan will be prepared as part of a project-level analysis.
L37	SCH	1	Mark Lostrom 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	All of the proposed alternatives will consume a lengthy time period and a significant amount of money. We believe the proposal should give a more detailed overview of the construction schedules and major milestones to allow sufficient information for comment. It is important to understand how long a given community/area will be impacted by the construction and what the sequence of interim events are to understand if everything is being done to minimize the pain of construction to our communities.	The Executive Committee recommended that projects be completed as quickly as possible to reduce construction-related impacts. As discussed in Section 2.2.7 of the Final EIS implementation plans that match various funding scenarios will be developed. With sufficient funding, large corridor segments on I-405 can be constructed within a five- to six- year period using design-build. Construction will be planned to have the least possible impacts on peak-hour traffic.
L37	O	3	Mark Lostrom 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	While we recognize that the mitigation plans are very high-level at this time, it appears that more information regarding various techniques should be included. As an example, the City of Medina considers the use of freeway lids to be a crucial part of any major transportation plan. We do not know if they are being considered in this proposal. They should be included to provide a better quality of life for the impacted cities.	Detailed mitigation options required for permitting and community acceptance will be developed during the project-level design. Mitigation to reduce noise impacts and visual aesthetics will be important for community acceptance.
L37	O	4	Mark Lostrom 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	While the plan references environmental issues and possible mitigation solutions, there is never enough detail to provide an understanding of the potential success or the cost of the mitigation. Our environmental needs should receive more attention in this plan to ensure that they are not compromised in any way.	To help address your concerns, WSDOT has prepared and is implementing a proposed early-action environmental impact mitigation decision-making process. In addition, follow-on NEPA and SEPA environmental analysis, documentation, and review will be prepared that addresses project costs and mitigation measures in greater detail.

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L37	TR	3	Mark Lostrom 501 Evergreen Point Rd PO Box 144 Medina, WA 98039-0144 Agency: City of Medina	We are somewhat concerned with references to "transportation pricing" and "high capacity transit (HCT) system." While the study acknowledges that further definition of both concepts is needed, we would urge caution at this time. Neither concept has a proved track in the area of the study and there should be real concern over either one of them ever being embraced by the public.	The Preferred Alternative recommends that pricing be considered at the regional level. It also recommends further study of HCT in the central study area, which would include the Medina area.
L38	O	1	Sandra Dyer 1055 S Grady Way Renton WA 980955 Agency: City of Renton	Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the I-405 Corridor Program. Enclosed with this letter are five (5) pages of comments. These comments represent the collective view effort of several departments within the City of Renton. We look forward to the Final EIS and seeing these comments reflected in the text. If you have any questions, please contact Nick Afzali, Planning and Programming Manger at (425) 430-7245	Thank you for your comment.
L38	O	2	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	In addition to our comments presented in the Preferred Alternative Worksheet, the following are comments on the DEIS for the I-405 Corridor Program. We understand that this DEIS is a programmatic document and there would be additional documentation at a project level to address mitigation plans associated with proposed improvements. However, some of our comments on the PDEIS that were at a programmatic level were not incorporated into the DEIS. We expect WSDOT staff to review our comments on the PDEIS again and the ones that are at a programmatic level will be incorporated into the Final EIS.	The detailed review comments and input on the preliminary Draft EIS that the City of Renton provided as a member of the I-405 Corridor Program Steering Committee are appreciated. These were fully considered in combination with input and comments received from the other Steering Committee members. The preliminary Draft EIS was revised in response to all Steering Committee members' input. All programmatic level comments from the City of Renton were considered during preparation of the Draft EIS. The co-lead agencies will continue to work with the City to address comments and concerns during project-level design and analysis.
L38	TR	1	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	Transportation Demand Management (TDM): Additional funding should be allocated for the strategies presented in the TDM package. The Congestion Pricing element of this package must have public support before implementation and shall be through Puget Sound Regional Council efforts throughout the entire region.	The I-405 Corridor Program Executive Committee recommended early-on that funding for the TDM program be substantially increased, which has influenced the current level of funding contained in the Preferred Alternative. The Preferred Alternative defers congestion pricing to regional policy decision-making by the PSRC. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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L38	TR	2	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	Transit: We support the 100% increase of transit service for alternative three, as long as local transit service needs are also met. Providing additional connectivity between regional and local transit service would support the modal shares discussed in the DEIS.	The Preferred Alternative provides up to a 70 percent increase in transit service. Some efficiencies were achieved by further examining the productivity of the transit routes included in Alternative 3.
L38	TR	3	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	Any type of Fixed Guideway High Capacity Transit (HCT), shall be located only within the I-405 alignment corridor before receiving our support for HCT. Burlington Northern Santa Fé Railroad (BNSF) right-of-way in Renton shall not be used for HCT. This is due to potential major adverse impacts on business and residential neighborhoods in Renton. We support Bus Rapid Transit (BRT) as long as adequate capital improvements (arterial and HOV) are provided to reach established goals for transit speed and reliability.	BRT along I-405 is included in the Preferred Alternative. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies.
L38	TR	4	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	Park-and-ride facilities shall primarily be located at the City limits to intercept non-local traffic, thus reducing congestion on local arterials within the study area.	Many park-and-ride facilities are located near city limits within the corridor. Others are situated at high-demand locations along I-405 itself.
L38	TR	5	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	SR-167/I-405 Interchange: General purpose and high occupancy improvements to the intersection of Grady Way/Rainier Avenue should be incorporated into the final configuration of the SR-167/I-405 interchange. This could include options such as tunneling under Rainier Avenue from the interchange to north of Grady Way, potential grade separation and/or other concepts as deemed appropriate working in cooperation with the City. Our goal is to minimize impacts on adjacent businesses as much as possible while developing an acceptable transportation solution in this area.	HOV and GP capacity are being provided within the conceptual interchange design.

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L38	WR	1	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	Provide quantity control (detention) and water quality improvement for all existing and new right-of-way improvements. The quantity and quality controls should be designed in accordance with the Draft (soon to be finalized) State Department of Ecology Storm Water Manual for Western Washington, or at a minimum the current version (1998 or later version) of the King County Surface Water Design Manual. If WSDOT storm systems are currently, or proposed to be, discharged to City storm systems, the downstream system's capacity should be analyzed and off-site improvement made as part of the project, if needed.	As stated in the last paragraph of Section 3.5.2.1, the detention and water quality treatment requirements in the Washington State Department of Ecology's (Ecology's) Stormwater Management Manual for Western Washington or functionally equivalent guidance will be met by the I-405 Corridor Program. The downstream analyses performed for the individual stormwater facilities will review the capacities of City stormwater pipes receiving runoff, factoring this into highway runoff design.
L38	WET	1	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	Preliminary Alternative #3 has significant impacts to wetlands within Renton. There will be many agencies associated with permitting and requiring mitigation for the project's wetland impacts. At a minimum, the project should be held to a "no net loss" of wetland area, function and value. Replacement ratios for wetland mitigation should at a minimum satisfy Renton's wetland replacement ratios for wetland impacts in Renton. Ecology or Army Corps of Engineers replacement ratios would be acceptable if they are more stringent than Renton's. Wetland mitigation should be done in the same basin and as close as possible to where the impact occurs. WSDOT should establish wetland mitigation banks in the basins where wetlands will be impacted by the project, and establish the wetland banks as required by the State's Wetland Mitigation Banking rule. This will ensure that the created wetlands are established, and have the same function and value as the wetland that is to be impacted, prior to the wetland being filled by the project.	Impacts will be mitigated to meet the most stringent applicable requirements. The "no net loss" approach will be applied as a minimum regardless of the mitigation requirements. WSDOT currently has an active mitigation bank program. As indicated in Section 3.6.5.1, wetland mitigation banking may be a viable option to mitigate for wetland impacts that result from the I-405 improvements. The feasibility of a mitigation bank approach is still being determined. WSDOT is currently working on an "Early Action Environmental Impact Mitigation" strategy at a watershed or "programmatic" level. This mitigation strategy has been designed to coordinate closely with the WRIAs 8 and 9 "Near-Term Action Agenda." The mitigation may provide large-scale off-site projects such as preservation of intact habitat that would benefit the overall watershed functioning, while allowing for transportation needs. In contrast, site-specific, on-site, in-kind mitigation will be negotiated with agencies and designed separately for each of the numerous individual projects in order to comply with local critical areas regulations as well as mitigation requirements typically required by local, state, and federal jurisdictions.
L38	FATE	1	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	The project should provide mitigation to provide for "no net losses" of stream buffer area, function and value. In addition the project's impacts to fish habitat (spawning, rearing and passage) should be held to the same standard. Replacement ratios (2:1) for impacts to stream buffers and fish habitat should be required. Mitigation should be incorporated at the location of the impact to the maximum degree possible, but the additional mitigation could be done offsite within the same basin or watershed. A mitigation fund could be established for acquisition, restoration or enhancement of stream buffer and/or prime fish habitat sites that have been determined to be beneficial to	A few of the objectives of the I-405 Corridor Environmental Program are to avoid and minimize impacts to fish and wildlife and their habitat to the extent practicable and compensate for unavoidable impacts; to maintain, protect, and enhance the functions of fish and wildlife habitat, wetlands, and other waters of the state and seek a net gain in those functions through preservation, restoration, creation, and enhancement; to adaptively manage mitigation sites; and to design, implement, monitor, evaluate, and adjust mitigation sites to ensure that defined standards are met. There are many different ways to achieve these goals beginning

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				improving salmon habitat. The project should not only mitigate for the actions' impact, but should have a restoration element to offset prior impacts and the fact that mitigation benefits are not immediately achieved, especially when it comes to stream buffers. Any existing culverts or other stream crossing structures that are barriers or restrictions to fish passage should be replaced with new structures that do not prevent or restrict fish passage.	with impact avoidance, on-site and off-site enhancements, restorations, barrier removals, and mitigation funds or banks. At the watershed, or "programmatic" level, WSDOT has developed an "Early-Action Impact Mitigation" strategy. This strategy incorporates information from federal, state, and local agencies regulations and policies, including recovery plans, to provide for comprehensive, relevant, and cohesive decisions about mitigation. The strategy has been closely coordinated with the WRIA 8 "Near-Term Action Agenda." Some of the proposed mitigation may provide large-scale off-site projects, such as preservation of intact habitat that could benefit the overall watershed functioning while allowing for transportation needs. In contrast, site-specific, on-site, in-kind mitigation will be designed for each of the numerous individual projects in order to comply with local critical areas regulations as well as mitigation requirements typically required by WDFW under the State of Washington Hydraulic Code. Such site-specific mitigation cannot be proposed at present because the numerous individual projects do not yet have the requisite level of design detail or site-specific information about the streams.
L38	FL	1	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	The project should be required to provide compensatory storage for filling of the floodplain. A "zero rise" to the floodway standard should be applied to the project. The project is also required to comply with all FEMA and National Flood Insurance Program (NFIP) standards, since Federal funding will be used. No encroachment into the floodway should be allowed. New bridge low chord elevations (bottom of the bridge) should be set above the future land use condition 100-year flood elevation by a minimum of three (3) feet, or higher on streams or rivers with the potential for large debris flows (Cedar River, Green River, May Creek).	WSDOT will comply with the compensatory storage requirement for filling of the floodway.

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L38	U	1	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	The I-405 right-of-way creates a major barrier to utility services. A hydrologic and hydraulic analysis of all existing and proposed culverts, storm systems and bridges that cross I-405 should be performed to verify that the system has adequate capacity to convey the 100-year, 24-hour storm for future land use conditions. If the analysis indicates that the system has insufficient capacity, then it should be replaced with the properly sized facility. This is needed to ensure that adequate storm water service can be provided across the I-405 corridor and that the project will not create upstream drainage problems. Any City-owned utility (water, sewer, storm water) that has to be relocated or is impacted by the project, should be relocated or mitigated as directed by the affected utility. If the utility has to be relocated, the City shall determine the size and approve the location as part of the project, at no cost to the City.	Hydrologic and hydraulic analyses of existing and proposed systems will be carried out during project-level analyses for the design storm conditions required by the methodology in effect at the time of the analyses, and as required for permitting. The cost responsibility for required utility mitigation, such as resizing and relocation, is typically described in the agreement between the right-of-way owner and the utility owner for locating, constructing, and operating the utility within the highway right-of-way. Since terms of these agreements may vary, cost responsibility for resizing and relocation of utilities within public right-of-way would be determined on a case-by-case basis.
L38	SH	1	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	The project should be required to comply with the currently adopted Washington State Department of Ecology Shoreline Management Guidelines and City-adopted Master Shoreline Program regulations. Impacts to shorelines should be mitigated as described in the Stream Buffers/Fish Habitat Section, but the replacement ratio should be higher, since the water body that the shoreline regulations protect is of higher value.	Upon the confirmation of State's shoreline rules and guidelines, project-level mitigations will be designed in accordance with the recognized rules.
L38	WR	2	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	1. Criteria listed in the last paragraph of section 3.5.2.2 (page 3.5-4) are insufficient to determine whether the alternatives pose a substantial impact upon groundwater resources. Additional criteria should include: a. The impact of alternatives on the quantity of groundwater available for withdrawal for drinking water purposes; and b. The impact of alternatives on the quality of groundwater that supplies base flow for streams important for endangered salmon.	A program-level groundwater analysis was conducted to evaluate the effects of each alternative on groundwater quality and quantity. The analysis consisted of tabulating a series of quantifiable data measures for each alternative. The data measures included such general items as number of nearby wells; number of wellhead protection areas (WHPAs), sole-source areas (SSAs), and critical aquifer recharge areas (CARAs) crossed; recharge area decrease; and new impervious surface. This information combined with professional judgment was used to develop qualitative assessments of the impacts to groundwater quality

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					and quantity. This methodology was reviewed and approved by the Steering Committee. The details of the groundwater analysis are contained in the I-405 Corridor Draft Groundwater Resources Expertise Report, which was also reviewed and approved by the Steering Committee. Detailed analysis and evaluation of impacts related to specific projects will be conducted in the future when adequate project-level design detail is available.
L38	WR	3	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	2. Little or no information is provided in the DEIS regarding the method and outcome of a determination of substantial impact using the listed criteria. The Water Utility needs to know: a. How was it determined whether an alternative would cause a public water supply to exceed drinking water standards and what were the results of that determination? b. How was it determined whether an alternative would substantially reduce flow to groundwater-fed resources used by fisheries and recreation, and what were the results of that determination?	See response to comment L38.WR-2.
L38	WR	4	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	3. Error page S 27 second mitigation paragraph under water resources: Clearing should occur no sooner than one week prior to starting construction.	The suggested text revision has been made to the water resources section of Table S-2 in the Final EIS
L38	WR	5	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	4. 3.5.3.2 states that Renton, Kent, and Redmond are in Groundwater Management Areas. This is incorrect. The Cedar River watershed is the source of groundwater that supplies drinking water for Renton. This watershed is not included in any Groundwater Management Area. A "City of Renton Groundwater Protection Plan" is mentioned. There is no such plan. This raises the question of where the consultants obtained information regarding hydrogeology of the Cedar Valley Sole Source Aquifer.	Section 3.5.3.2 has be revised to make it more clear that Redmond is in the Redmond-Bear Creek Valley Groundwater Management Area, Kent and part of Renton are in the South King County Groundwater Management Area, and that Renton obtains its groundwater from the Cedar Valley sole-source aquifer.

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L38	WR	6	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	5. A map of Wellhead Protection Areas should be included in the DEIS to accompany the map of Sole Source Aquifers and Critical Aquifer Recharge Areas (Figure 3.5-2).	Figure 4.2 of the I-405 Corridor Draft Groundwater Resources Expertise Report shows wellhead protection areas (WPAs) for the Class A wells and the locations of the Class B wells. Section 3.5.3.2 of the I-405 Corridor Program Final EIS has been modified to reference this figure.
L38	WR	7	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	6. The Renton Municipal Code (RMC) contains several requirements relevant to projects that occur in the Aquifer Protection Area (APA). These should be added to the list of mitigation in Table S-2 for Water Resources under "Groundwater". The requirements include: a. An imported fill source statement demonstrating compliance with fill quality standards in RMC 4-4-060L4; b. A Hazardous Materials Management Statement demonstrating compliance with Construction Activity Standards in RMC 4-4-030C7; c. No infiltration of runoff in Zone 1 APA both during construction and operation phases of the project per RMC 4-6-030E2, 3; and d. Compliance with Pipeline Specifications 4-3-050S in Zone 1 APA.	A comprehensive list of all the specific laws, regulations, ordinances, and codes is outside the scope of this programmatic EIS. A general reference to municipal codes protecting groundwater has been added to Table S-2.
L38	WR	8	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	7. It is insufficient for purposes of protecting Renton's drinking water to collect project runoff, test it, and treat it prior to infiltration. To reiterate, City Code does not allow infiltration of project runoff both during construction and operation. Runoff from the project, when located in Zone 1 of the Aquifer Protection Area or a one-year capture zone of a Wellhead Protection Area, should be collected in lined detention ponds, treated, and diverted to surface water. To protect surface water, adequate detention volume should be provided to contain a hazardous material spill until it can be removed from the pond.	Section 3.5.5.2 of the I-405 Corridor Program Final EIS has been revised to reflect the Renton Municipal Code's (RMC's) requirement of not allowing infiltration of project runoff in the Aquifer Protection Area (APA).
L38	ROW	1	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	8. Section 3.14 Displacement and Right-of-way Acquisition (page S-43): The proposed right-of-way acquisition program, and relocation compensation does not address if the project will impact the existing City of Renton's drinking water wells, pump stations and water treatment facilities adjacent to the I-405 right-of-way. These facilities cannot be relocated or acquired by WSDOT.	Specific displacements of water wells, pump stations, and water treatment facilities were not analyzed; however, avoidance, minimization, or acquisition with functional replacement/compensation according to FHWA guidance and other regulations would occur at the project level. If it is determined at the project level that it is not possible or practicable to acquire the facility as described under the Preferred Alternative, additional environmental analysis, documentation, and review would occur for any new proposed alignment. Impacts to water utilities have been addressed within the Final EIS under Sections 3.5 and 3.19.

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L38	REC	1	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	In Appendix H-11 the text indicates that in the Cedar River Park and Trail, expansion of lanes on I-405 would impact the parking area adjacent to the freeway while HOV bypass lanes on SR-169 would impact the parking area on the east side of the park. Yet in Appendix H-17 there is no mention to impacts to the parking lots, but rather temporary impacts to the trail and relocating the aquifer well-system. Clarification is needed. The potential to lose parking for a facility that is always used to capacity and is in high demand is a considerable impact. This park was also the site for a future water recreation facility as approved by our City Council. There is a lack of discussion regarding potential impacts to the Narco Property, May Creek Park and noise impacts to Liberty Park. It appears none of these are addressed throughout the study. These comments have been made twice in previous document reviews . One of the items that Parks suggested for mitigation was the development and maintenance of a park on a lid (between Cedar Avenue South and Renton Avenue) to mitigate the loss of park opportunities, and noise impacts to parks along this corridor. This is not mentioned as an option at any time throughout this document, but rather more mundane mitigation measures such as "enhancement" of existing amenities. The loss of a recreational opportunity cannot be readily mitigated by enhancement - such as more landscaping.	As this is a programmatic EIS, the detailed impacts to particular properties and related parking facilities will be fully evaluated for mitigation at the project level. The impacts to the parking area will be evaluated and mitigation designed once the City and WSDOT agree upon the design. As the Draft Preliminary 4(f) review was based on a programmatic conceptual design level, any potential Narco Property, May Creek Park, and Liberty Park impacts will be analyzed during the site-specific project design stage. The mitigation included developing replacement parks, and does not preclude other mitigation options. The concept of a lid would need to undergo a technical and environmental analysis during the site-specific project design stage.
L38	N	1	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	In the previous document, it was stated that noise insulation of buildings was not a remedy that worked for residents and businesses. This sentence has been removed, implying that it is an effective remedy for residents and businesses. If this is true, we accept the change. If this is not true, the sentence stating that building insulation is not an effective remedy needs to be put back in.	Noise insulation of public and not-for-profit buildings could be feasible.

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L38	ECON	1	Sandra Meyer 1055 South Grady Way Renton, Washington 98055 Agency: City of Renton Planning/Building/Public Works Department	Section 3.16.2.4, Regional Economic Development, second paragraph, second to the last sentence. This sentence states that "This (market density and associated congestion) contradicts the assumption that congestion is always undesirable for firms and individuals". The plain forthrightness of the statement belies the complexity of the situation. Therefore, additional wording is necessary to clarify that congestion may be good for some businesses some of the time (e.g. retail - up to a point), but is not good for all of the businesses all of the time. This is especially true for manufacturing, where congestion does not bring in a market (making market density an irrelevant factor) but obstructs the timely and therefore cheaper delivery of goods. This can reduce a company's competitiveness and therefore their market share. This distinction in businesses needs to be clearly stated.	Section 3.16.2.4 has been revised to clarify this issue.
L39	O	1	Margaret Pageler Larry Phillips Agency: WRIA 8 Steering Committee	We are writing to you on behalf of the Lake Washington/Cedar/Sammamish (WRIA 8) Watershed Steering Committee. The WRIA 8 Steering Committee is a multi-stakeholder, multi-jurisdictional group overseeing the development of a salmon conservation plan for the Greater Lake Washington watershed. Twenty-six of the jurisdictions in the Greater Lake Washington watershed have signed an interlocal agreement to fund this planning process, so it is truly a regional effort to conserve salmon and salmon habitat.	Thank you for your comment.

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L39	FATE	1	Margaret Pageler Larry Phillips Agency: WRIA 8 Steering Committee	Thank you for your recent presentation on the I-405 Corridor Project. We are very interested in the project because of majority of the I-405 Corridor Study Area falls within the Greater Lake Washington watershed. As outlined in the Draft EIS, there will be significant direct and indirect environmental impacts to critical subareas in WRIA 8 including: * Lower Cedar River * Bear Creek * Sammamish River * Little Bear Creek * Kelsey Creek * Swamp Creek * North Creek * Mercer Slough * May Creek * Coal Creek * Juanita Creek * West Lake Sammamish, and * Lake Washington. Many of the potential environmental impacts of this project such as wetland loss, increased impervious surface, decreases in recharge areas and encroachment on streams will add to problems we have already identified in WRIA 8 as being factors of decline for salmon. We are concerned that the environmental impacts of I-405 Corridor Project will further degrade salmon habitat at the same time the region is working to conserve salmon habitat. We are anxious to see that the environmental impacts for this project are minimized and fully mitigated. Therefore we would like to work closely with WSDOT to identify mitigation opportunities and set priorities that will help address the factors of decline for salmon in this watershed. The WRIA 8 Technical Committee and the Washington Conservation Commission have identified the following factors of decline for WRIA8: * degraded riparian conditions * altered hydrology/flow * poor water quality * degraded channel complexity and connectivity, and	The co-lead agencies thank you for your comment. The "Early Action Environmental Impact Mitigation" strategy is designed to coordinate closely with the WRIA 8 "Near-Term Action Agenda."

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				* increased sedimentation and altered sediment transportation processes. We are currently developing a Near-Term Action Agenda for the watershed that will identify low-risk programs and projects that are well-grounded in science and address the factors of decline for salmon. Recommended actions can be started in the next five years while the region finalizes a longer term salmon conservation plan. A draft of the Near-term Action Agenda is expected in early 2002 and could be quite useful to in your project.	
L40	O	1	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	The Puget Sound Regional Council appreciates the opportunity to comment on your Draft Environmental Impact Statement (DEIS) for the I-405 Corridor Program. We commend the Washington State Department Transportation (WSDOT) and its partner lead agencies for undertaking this effort as part of a national pilot project seeking to demonstrate a proposed new approach to implementing the National Environmental Policy Act (NEPA), better known as "Reinventing NEPA." We also recognize that this is a unique and innovative effort to develop a programmatic EIS combining the NEPA process with the State Environmental Policy Act (SEPA) process. This integrated process seeks to highlight the more distinctive broad issues and strategies among a range of alternatives earlier in the corridor planning process before focusing on specific design details at the project level of the major corridor planning process. We find that the DEIS does a very good job of presenting an appropriate level of environmental analysis relating to the impacts of the I-405 Corridor Program alternatives, and that it is well organized and readable.	Thank you for your comment.
L40	TR	1	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	Successful implementation of strategic transportation capacity improvements within the I-405 corridor is a vital element of the adopted long-range regional transportation plan, Destination 2030. The Regional Council has previously provided substantial funding to support this critical planning and environmental effort as the I-405 transportation corridor is critical to meeting the region's mobility challenge. The I-405 corridor also provides a vital economic corridor for moving goods and people within and through the region. We applaud the program sponsors and participants in taking a seriuos, thoughtful, and strategic look at various mesan for ensuring this corridor can remain functioning well into the future, to the benefit of the entire region.	Thank you for your comment.

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L40	TR	2	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	These comments on the I-405 DEIS offer guidance in two broad areas to help shape further analysis and final decisions in the I-405 Corridor Program to achieve sucessful future regional approvals, a prerequisite under federal and state law for proposed programs and projects to advance to implementation. The process for such regional decisions is referred to in Destination 2030 as the Candidate/Approved process and is explained in more depth later in this letter.	Please refer to later responses.
L40	LU	1	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	The two areas in which we offer guidance are: **1. Guidance to evaluate consistency with regional policy.** To help advance subsequent I-405 corridor and project level decisions, it would be of great assistance to provide citizens and decision makers with greater clarity in the evaluation of how the distinct action alternatives and their components support regional multicounty policies that have been developed and adopted pursuant to the State Growth Management Act [RCW 36.70A.210(7)]. The DEIS suggests that all alternatives are consistent, but given that these alternatives are quite different, it is reasonable to expect to find varying degrees of consistency among the alternatives. A more focused evaluation to better describe consistency with regional policy among alternatives would greatly assist in the Regional Council's subsequent regional evaluation to evaluate the final preferred corridor program alternative and its component projects for consistency with VISION 2020 and Destination 2030.	The alternatives were evaluated for overall consistency with the relevant regional policies (see Draft Land Use Plans and Policies Expertise Report.) However, additional analysis in the Final EIS – Section 3.13 confirmed the consistency of the Preferred Alternative and the action alternatives to the relevant regional policies. Please also see response to comment L40.LU-2.

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L40	O	2	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**2. Guidance for regional plan amendment and capacity investment decisions.** The comments in this area are directed to help address the yet unresolved issues within the corridor program that would help assure the region's ability to make positive future decisions to enable the I-405 corridor program and its project components to be changed from "candidate" to "approved" status in Destination 2030. In general, the issues noted here address the subject areas noted in Appendix 6 of Destination 2030 that deal with guidance for major capacity investment decisions. The nature of the areas to be addressed for subsequent implementation approvals in the I-405 corridor include: 1) satisfactory completion of both "programmatic" and "project level" environmental processes; 2) explanation and documentation of how the benefit-cost analysis prepared for the corridor study was used as input to the decision process; 3) preparation of an analysis to determine the degree to which more full managed additional lane capacity might more positively support regional policy and assist in partial self-financing and improved system performance; and 4) preparation of financial feasibility plan and phasing strategy for the overall corridor program and its components (these latter two items could either be incorporated in the FEIS or conducted as a subsequent separate analysis leading to more specific project implementation recommendations and decisions).	It is envisioned that the following process will be followed: (1) conduct an analysis to determine the degree to which additional managed lane capacity might more positively support regional policy and assist in partial self-financing and improved system performance and (2) prepare a financial feasibility plan and phasing strategy for the overall corridor program and its components subsequent to the I-405 Corridor Program Final EIS as separate analyses.
L40	O	3	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	These areas are elaborated upon below, and addressing and resolving these key issues will help assure that the I-405 Corridor Program, and its later more detailed project implementation components, can be successfully incorporated as "approved" projects in Destination 2030, a prerequisite for eligibility to take future action to approve funding for any implementation projects. Additionally, as an attachment to this letter we also provide some technical edits, corrections and clarifications regarding the DEIS that should be addressed in the FEIS.	Thank you for your comment.

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L40	CU LU	1 2	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Guidance for Evaluating Consistency with Regional Policy** The ***I-405 Corridor Program*** is a major implementation component of the adopted regional transportation plan, *Destination 2030*. *Destination 2030* is the transportation element of the regional growth, transportation, and economic strategy, VISION 2020, developed and adopted pursuant to state and federal requirements. The scale and significance of the potential future investments in the I-405 corridor suggest that the nature of the specific projects that are to be built, and the manner by which the corridor is managed will have a considerable influence over long-term growth and development within the central Puget Sound region. To evaluate regional plan consistency for such a major corridor investment the Regional Council's practice is to evaluate projects and programs against all adopted regional policies. For relatively small project components that may only address a localized need in the corridor, a subset of regional policies would be used for the applicable evaluation. The I-405 Corridor Program DEIS states the following in the "Cumulative Analysis" section of the document: All of the core projects and strategies in the four action alternatives developed for the I-405 Corridor Program are included in Destination 2030. These transportation improvement projects and strategies are in response to the planned growth under the existing jurisdictional comprehensive plans, which in turn conform to the regional planned growth under VISION 2020. Destination 2030 includes the I-405 study arterial, transit, and freeway improvements, and includes two general-purpose lanes in each direction on I-405. (p. 3.23-4) And goes on to state:	As mentioned in the initial response to comment L40.LU-1, the I-405 Corridor Program did review the alternative elements for consistency with the relevant PSRC regional policies and the local jurisdictional policies. It is correct to assume that the projects will continue to be analyzed and reviewed at the project-specific design/environmental stage for consistency with policies as required by state law. Additionally, a subset of regional policies and the relevant local agency policies were analyzed for consistency in the Draft Expertise Land Use Plans and Policies Report. You are correct that *Destination 2030* and the Metropolitan Transportation Plan, in regards to I-405 corridor projects, call out the arterial, freeway, transit improvements, and two general purpose lanes. However, *Destination 2030*, based on *VISION 2020*, also calls for TDM strategies, which are included in the I-405 Corridor Program. The policies call for supporting transportation infrastructures, with an emphasis on transit-oriented development in the centers, which are included in the I-405 Corridor Program. The I-405 Corridor Program elements in the action alternatives are a combination of regional and local projects. While they are not all specifically called out in *Destination 2030*, many exist in regional and local agencies' capital improvement plans and transportation elements. This is important to note, as the regional and local plans, specifically the transportation elements, have been reviewed and certified by PSRC. Related to the relevant regional policies and regional objectives, the alternative that is the most consistent with those policies is the Preferred Alternative. The underlying objectives of the I-405 Corridor Program are similar to the referenced regional policies, providing regional connections with an efficient multimodal transportation system. The FEIS, in Section 3.13, provides information regarding the degree to which the individual action alternatives are supportive of applicable regional policies.

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				The I-405 Corridor Program alternatives are compatible with existing regional and local land use plans, which already address growth. (p. 3.23-13) These very broad statements imply to the reader that all the I-405 Corridor Program alternatives are equally consistent with regionally adopted policy. Given the intentionally significant differences that are being examined among the I-405 action alternatives, it should be made more clear to the public that there are varying degrees of consistency and compatibility with the broad body of adopted regional policy among the alternatives and their respective components. The underlying theme of adopted regional policies is to focus growth in compact communities and centers, and to connect them with an efficient multimodal transportation system. Distinctions among alternatives that run from no freeway capacity to expansion that potentially doubles freeway capacity cannot help but have differing degrees of influence on regional development and travel patterns - such differences in the degree of support for regional development policy/strategy should be better distinguished. The actual combination of components that are to be recommended in a final preferred alternative need to be carefully assessed to assure consistency with regional policy. As noted in later comments herein, addressing some of the still "unresolved issues" in the I-405 DEIS will significantly influence the degree to which any alternative component will support regional policy. A more systematic approach to regional policy evaluation may prove an informative exercise for the programmatic approach to corridor planning. To this end, the I-405 Corridor Program alternatives should be evaluated against all regional plan framework policies as summarized by the eight Multicounty Framework Policies and the four broad categories of transportation policy adopted in VISION 2020 and Destination 2030. This framework of regional policies is attached at the end of this letter for your reference.	Regarding the different levels of consistency with relevant regional policies the No Action Alternative has limited improvements and is less supportive of the relevant *VISION 2020* and *Destination 2030* policies, mainly due to lack of a system-wide multimodal approach. Alternative 1 emphasizes reliance on high-capacity transit (HCT) and significant expansion of bus transit service within the study area. It also attempts to minimize new impervious surface from general purpose transportation improvements by placing emphasis on non-physical solutions and transportation demand management (TDM) strategies. The primary focus of Alternative 1 is on the HCT element and not the existing SOV congestion problem. Therefore, this alternative is less supportive of the relevant regional policies in regards to a multimodal approach to the existing problems. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. Alternative 2 emphasizes high-capacity transit through implementation of an overall HCT system and significant expansion of bus transit service, similar to Alternative 1. It also emphasizes improved mobility for other travel modes by providing HOV and general purpose roadway improvements on I-405 and connecting arterials. Alternative 2 does not transfer the regional trips onto the I-405 freeway, but onto the adjacent arterial network. However, the emphasis on HCT and SOV solutions does provide a greater level of support, compared to the No Action Alternative and Alternative 1, for the relevant regional policies. Alternative 3, similar to the Preferred Alternative, emphasizes arterial and freeway access as mobility improvements for all travel modes through implementation of a BRT system, significant expansion of

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					bus transit service, arterial improvements, substantial HOV improvements, and the addition of two general purpose lanes in each direction on I-405. This alternative, when evaluated against the relevant regional policies and the Multicounty Framework Policies, was determined to have the highest level of consistency comparable to the Preferred Alternative. Alternative 4 emphasizes general purpose and HOV capacity by providing one additional lane in each direction on I-405 and a four-lane express roadway. It attempts to maximize new capacity with a focus on providing specific destination/origin access. This alternative is less supportive of the relevant regional policies in regards to a multimodal approach to the existing problems. The Preferred Alternative consistency analysis is included in the FEIS in Section 3.13. The alternatives were evaluated for overall consistency with the relevant regional policies (also see Draft Land Use Plans and Policies Expertise Report.) However, additional analysis in the Final EIS (Section 3.13) confirmed the level of support of the action alternatives for the relevant regional policies. Please refer to comments L40.LU-3 through L40.LU-8 for a brief summary of the alternatives with the highest level of policy consistency.
L40	O	4	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Guidance for Plan Amendment and Capacity Investment Decisions** The region's recently adopted metropolitan transportation plan, Destination 2030, recognizes the need to make many significant regional transportation system improvements to meet present and future travel and mobility challenges for people and goods. Of particular relevance to the I-405 corridor, Destination 2030 incorporates "candidate" corridor improvements for potential future but yet to be defined, major multi-modal corridor investments based upon early planning input from the WSDOT in summer/fall of 2000 while Destination 2030 was being developed. Appendix 6 of Destination 2030 provides additional guidance to help major efforts such as the I-405 Corridor Program assess and recommend regionally consistent decisions for major transportation capacity investments. The guidance in this appendix that is relevant to the I-405 Corridor Program addresses the following subject areas: a Corridor Approach, Major Project Records of Agreements,	Thank you for your comment.

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				Evaluating Benefits and Costs, Financing Plan, Candidate/Approved Project Status. The comments that follow offer guidance tailored to help further I-405 corridor analyses and discussions address the above subject areas in order that these corridor program and project component decisions best reflect regionally consistency to become eligible for implementation actions. **A Corridor Approach** The I-405 Corridor Program, has approached the investment decision process form a programmatic perspective. Holistic corridor planning has clearly introduced challenges, but the resulting bene-fits will be substantial. It is understood that certain project level details are not yet available and will not be analyzed within the EIS. Early in the DEIS it is noted that a number of significant issues re-mained unresolved at the time of publication. While recognizing this, several key areas still need to be addressed, either in prep-aration of the FEIS for a final preferred alternative or, in some cases noted further below, in other separate analyses and documentation.	
L40	SCH	1	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Implementation Phasing Framework** The programmatic approach to developing a successful corridor strategy requires that a set of future actions be taken by a broad set of agencies with various jurisdictional responsibilities. The successful implementation of such a corridor program will need to establish an implementation framework spelling out near-term and long-term actions, defining additional responsibilities and agree-ments that may be needed, and most significantly, the articulation of a financial plan for overall corridor and project implementation. While such an implementation framework is not required to be part of the environmental analysis contained in an EIS, it will ultimately be needed to provide a rationale showing how the corridor program can be pursued in a manner that will make the environmental findings relevant to an implementation program. The final EIS should provide a framework describing the nature of "next step" for future corridor and major project component planning and decisions that are intended to lead to corridor implementation actions.	Implementation plans and phasing scenarios are being developed. The implementation framework will be included in a final recommendation report for the I-405 Corridor Program, but is not included in the Final EIS.

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L40	TR	10	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Corridor Management and Design Issues** The DEIS has established a strong case to expand capacity in the I-405 corridor. This is consistent with the Regional Council's own assessment of major regional corridor congestion problems that need attention and have been documented in our Congestion Management System reports as well as Destination 2030. The issue of lane and facility management along with improving lane capacity balance in the northern and southern segments of I-405 continues to be a critical topic to resolve., The WSDOT and its study team are encouraged to continue exploring opportunities for lane balance and lane and facility management and design options that might help improve multimodal corridor and facility performance and preserve that performance in future years, as further analyses on this topic could influence the character of a final preferred alternative. The following are a number of more specific comments offered for guidance in this area:	The Preferred Alternative was analyzed further for efficiencies related to lane balance and facility management.
L40	TR	3	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	Facility Management and Pricing: On a facility management related issue, the DEIS did analyze road pricing as part of Alternative 1: High Capacity Transit and Transportation Demand Management alternative. However, within the context of the DEIS, the analysis of road pricing (sometimes referred to specifically as congestion pricing) falls short of providing a full picture of potential performance results and could leave the reader with little understanding of the potential benefits. The DEIS did note that road pricing, for the alternative within which it was examined, would likely be associated with lower total vehicle miles traveled that other alternatives that lack such facility management, the real characteristics of congestion pricing that are not included in the analyses are reduced lane volumes, higher vehicle throughout, and higher facility travel speeds during the peak travel periods. Subject to resolving some sensitive lane-balance issues between the northern and southern segments of I-405, the lane capacity expansion proposed under Alternative 3 might be further analyzed to explore benefits that may occur though application and operation of facility management and/or pricing to include two managed lanes in each direction.	The Draft EIS included available congestion pricing data from the PSRC Pricing Task Force studies. These data, and discussions with the staff and consultants involved in the analysis, indicated that changes in VMT were likely to be the most significant effect of a pricing strategy. The other effects noted in the comment would also likely occur. The Preferred Alternative includes consideration of managed lanes along I-405, but does not include a specific pricing component. Variable pricing was not analysed in the Draft EIS but could be in the future. The Preferred Alternative choice does not preclude this option. The Draft EIS documented the potentially substantial impact of pricing strategies on travel behavior and VMT. These results were presented to the committees as information relevant to their recommendations on the Preferred Alternative. Additional detailed modeling of pricing effects would be desirable at the regional level. The Draft EIS alternatives include improvements to east-west arterials that will feed into the capacity provided on I-405. Details regarding traffic management strategies will be further examined during the project-level evaluation phase.

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				The potential benefits in terms of total corridor and system performance, especially allowing for greater transit/HCT flexibility and reliability and more competitive and attractive HOV travel, may demonstrate significant immediate benefits for expanded facility capacity and warrant inclusion in a final preferred alternative. This suggested fine-tuning of Alternative 3 could help resolve several "unresolved" issues and may yield even greater corridor performance benefits. It would also be very compatible with more recent regional policy directions in Destination 2030. This same direction for more managed regional capacity expansion and consideration of pricing for partial self-financing is now part of all new major corridor investment planning. It is understandable that sophisticated modeling of variable road pricing is difficult, as available state of the art modeling tools, including the Regional council's model, have not been designed to always provide clear results. Nonetheless, empirical evidence found in many urban metropolitan areas in the U.S.> and Europe suggest that the potential benefit of analyzing road pricing in greater depth, either in the EIS analysis or as part of another separate technical examination. This analysis would be most beneficial to help evaluate whether the configuration of the ultimate corridor program that will be put forward for funding approval action might achieve the kind of effective ling-term facility operational management that directly addresses corridor congestion and assures improved system performance. The Regional Council can work with the WSDOT to help advise on how to conduct such an analysis. System Management for Non-Freeway Components: It is likely that some facility management strategies will have ramifications throughout the I-405 Corridor, and that these ramifications may, in part, require that other actions be taken. This is particularly important when considering how I-405 functions in relation to major arterial facilities within the study area, and also when considering effects on future land use and development pressures. Facility	These strategies are included to various degrees within the Final EIS action alternatives and the Preferred Alternative.

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				management should be pursued within the broad context of corridor investment, and should help define what else needs to happen to ensure that a managed facility is part of an overall mobility strategy. Facility management issues may need to apply beyond the I-405 facility itself. Within the DEIS there are several references to the inadequacy of the arterial network in the corridor: More than two-thirds of the total trips on I-405 begin and end in the corridor itself. (p.3.12-5) The relatively sparse roadway network in the I-405 study area creates the demand for the higher capacity state highways to frequently serve as the principal means of transportation, even for non-regional trips. (p.3.12-5) The overall Eastside arterial street network is not very dense...much of the adjacent arterial system is discontinuous because of topography and development patterns. I-405 currently carries a large number of non-regional trips, while traffic congestion on arterial streets remains severe. (p.3.12-6) In order for traffic throughout the corridor to use the increased capacity of I-405, additional traffic will need to travel along the east-west arterials on both ends of each trip to access the freeway. More clearly defined and targeted arterial traffic management and freeway access management strategies should be evaluated in the FEIS to achieve greater arterial efficiency and performance. These should at least include non-capacity system management strategies and improvements such as peak period arterial HOV treatments, improved signalization and transit signal priority treatments.	

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L40	TR	4	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	Transportation Demand Management Programs: All action alternatives for the I-405 corridor assume the same fundamental package of TDM improvements. While it is advisable that any alternative utilizes transportation demand management strategies, it is not likely or advisable that the basic TDM package for all altern-atives, including HCT/TDM Emphasis, would be the same. For example, for an alternative that significantly emphasizes high cap-acity transit, TDM strategies would be largely geared toward transit use and supporting services to make the most of that investment. On the other hand, an alternative that emphasizes general-purpose capacity expansion would be more focused on TDM programs that help people make carpooling, vanpooling, telework and other travel choices because of the lack of more extensive transit services and facilities. In addition, it therefore more likely that the magnitude of TDM investments would show greater variance among the alternatives. The final preferred alternative should offer and describe a more specifically tailored TDM package to meet the unique needs and opportunities presented by the final components selected for the preferred alternative.	At the programmatic level, it was decided to evaluate a common TDM strategy across the alternatives, realizing that specific TDM elements would vary depending upon the alternative chosen for implementation. The relative effectiveness of these strategies would also likely be somewhat different between alternatives, but not enough different to influence the choice of one alternative over another. The Preferred Alternative TDM program has been tailored to match the transit and carpool/vanpool focus of the program. It should also be noted that the estimated effectiveness of TDM programs that varied by alternative would still likely fall within the range of estimated effectiveness for the common TDM program. Emphasis would probably vary. Also, there is a lot of flexibility built into the TDM program so that its Steering Committee can make adjustments over time. A more tailored TDM package for the Preferred Alternative has been developed and is included in the FEIS.
L40	TR	5	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	Corridor Vulnerability & Lack of Redundancy: Studies have shown that areas that depend heavily on one facility for the majority of transportation movements, are more vulnerable to disruption of travel if a disaster (such as an earthquake) renders that facility unusable. The region has also seen this to be a significant problem when major traffic incidents shut down such a singular corridor travel facility. Conversely, areas with a more redundant road system are less affected by such disasters. Further work on the specifics of facility design structures and management should help address these factors, especially for the I-405 corridor segment south of I-90 where, due to topographic limitations, it remains the primary regional pathway linking much of east King County with south King County.	The FEIS includes additional discussion of this topic in Sections 3.12.4.1 and 3.12.4.4.

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L40	TR	6	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	Local Transit, Biking and Walking Trips: As a final note on facility design, it is understood that freeways are not normally suitable for local transit, biking, or walking. However, as just noted above, the southern portion of the I-405 corridor offers the only direct connection for such trips between much of the eastside and south King County and it currently serves and important regional role for those connections. Given corridor study directions to emphasize freeway development in lieu of expanding local road networks, these other trips must still be assured of regional connectivity in some fashion. It will be critical to assure that the final preferred alternative addresses how proposed corridor improvements will be able to maintain and improve efficient and safe travel for local transit, bicyclists, and pedestrians between east and south King County communities.	The Preferred Alternative includes improved pedestrian and bicycle facilities along the I-405 corridor and adjacent arterial facilities. Many of these nonmotorized crossing and trail improvements are located in the south end of the corridor. These facilities are tied to locally adopted plans of jurisdictions such as Renton and Tukwila. Transit routes serving a variety of travel corridors have also been analyzed.
L40	O	5	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Major Project Records of Agreements** Destination 2030 provides guidance in Appendix 6 for how to approach majority capacity investments. This includes a specific note of guidance relating to developing 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 would 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. (p.A 6-3) Due to the significant complexity of the I-405 Corridor Program it will be important to build a clear relationship between decisions made at the programmatic level and detailed project decisions that follow. The I-405 corridor clearly qualifies as a major regional capacity investment and should assume the need to incorporate development of this type of record of agreement at the end of the environmental process. This will enable all parties to understand the agreements and assumptions made in the resolution of the corridor decision	Through "Re-Inventing NEPA," in which PSRC is a participant, the WSDOT has established a process to document the understandings and agreements for the I-405 Corridor Program. It will include the concurrence of Agencies with Jurisdictions to the Preferred Alternative, Mitigation Program, and Conditions of Acceptance that are included as action strategies within the Corridor Environmental Program. WSDOT is proceeding with a three-step process that will provide documentation and records of agreements and project implementation actions/responsibilities. Although this process is not being called a "record of agreement" as such, the ultimate agreement, a memorandum of understanding, will be developed and implemented similar to the record of agreement that is suggested in your comment. The first step of the process is a concurrence agreement that documents concurrence with the Draft EIS Preferred Alternative, Program Mitigation Concept, and Agency Conditions for Support. This agreement documents the Concurrence Point #3 of "Re-inventing NEPA" and in signing it, the Agencies with Jurisdiction are agreeing to move forward and not re-visit previous concurrence points. This agreement will include attachments/documentation that show major steps in the project and implementation actions and

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				process that will later require follow-up among each of the participating parties in accordance with their respective roles and responsibilities. This type of document is quite separate and distinct form what is required under NEPA and called an environmental Record of Decision (ROD). The intent of this record of agreements is to maintain a publicly shared record of the understandings and agreements reached to ensure that subsequent project implementation actions and decisions keep the broad corridor program moving forward in a consistent and predictable manner. It can also assist with recognizing and organizing the institutional capacity to implement the program. Such agreements might include: near-term actions, project phasing and jurisdictional responsibilities, a program financing plan, commitments to conduct essential future analysis, and recognition of the need to develop more specific mitigation agreements. The more geographically specific mitigation agreements are likely to be developed in concert with later detailed project level environmental analysis that will accompany project level decisions. Many of these items are noted in the DEIS in the "Unresolved Issues" section.	responsibilities. The next step of the process will involve amendments to local, regional (including the Metropolitan Transportation Plan), and state plans to document and incorporate agency-specific program/project elements of the I-405 Corridor Program. Although we recognize that the timing of the comprehensive and regional plan amendment process might not align perfectly with the anticipated schedule of the amendment process, this probably should not be a major concern since most early action amendments will occur at the Transportation Improvement Program level. The final step of this process will involve the development and execution of a formal "Memorandum of Understanding" (MOU) or similar document. The MOU will define near-term implementation actions and responsibilities for the agencies. This MOU will commit individual agencies to actions and implementation measures recommended in the I-405 Corridor Program Preferred Alternative. The MOU will also document how monitoring of project implementation within individual agency plans/programs is to proceed. This process is currently underway, with the Concurrence Agreement developed prior to issuing the FEIS. The expectation is that the comprehensive plan / program amendment process should occur during the summer and fall of 2002. The comprehensive plan / program amendment process is anticipated to take several months and should be completed in late 2002. The MOU would be developed and executed in 2003. Lastly, the information that was developed, responses to comments, and commitments made through this Final EIS will shape scoping for follow-on projects and environmental analysis, documentation, and review, as well as development of the corridor environmental program.

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L40	COST	1	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Evaluating Benefits and Costs** The I-405 Corridor Study included considerable efforts to develop and execute a more rigorous benefit-cost analytical process. This is a highly commendable action that aids in the transparent comparability of alternatives through the application of a rigorous accounting framework. The benefit-cost analysis performed during the I-405 Corridor Study is not mentioned within the DEIS but it would be a useful addition for greater public understanding of this complex subject. The "Economic Impacts" section of the DEIS addresses employment effects, tax revenue effects, and address the expected economic benefits and costs of implementing the corridor improvements. Such additional impact assessment might be very useful to help make a case for corridor program implementation. A properly specified and executed benefit-cost analysis can provide information about the specific economic effect of a project or program.. Understanding the full extent of economic resources dedicated to a project, or depleted through direct actions that result from the project, compared to the magnitude and distribution of economic benefits provided by the project is the appropriate subject of project or program level economic impact analysis. While this work has been performed, it was not part of the EIS or referred to in the :Economic Impacts" section of the DEIS. Benefit-cost analysis is significant only to the degree to which it is incorporated into a broader decision process. It would be useful to include in the FEIS some reference to the benefit-cost analysis as one additional tool used to inform the investment decisions that will be made. The inability to reasonably represent pricing or other facility management strategies, however, is particularly problematic within the contact of a corridor or project benefit-cost analysis. The benefit-cost analysis performed for the I-405 Corridor Study does note the difficulties associated with analyzing management strategies, given that the input data for the benefit-cost analysis is influenced by management strategies should be adjusted in a post processing analysis for inclusion in a sensitivity analysis. Examination of the existing benefit-cost analysis and the factors that might tip the outcome of the analysis suggest that it is likely that strategic facility management may yield superior performance and greater economic benefits under a further benefit-cost test.	A decision was made not to include the benefit-cost analysis in the Draft EIS. The benefit-cost analysis will be updated to include the Preferred Alternative, and results will be available as a final working paper. Projects generated from the Preferred Alternative need to become part of PSRC's *Destination 2030* MTP for implementation. Specific project elements will need to compete at a regional level for funding and prioritization. An analysis of benefits and costs for the Preferred Alternative will be completed and included in the final recommendations report.

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				The overall efficiency of transportation systems is a central regional policy objective contained in VISION 2020 and Destination 2030. As is suggested by the results of the benefit-cost analysis, Alternative 3: Mixed Mode Emphasis appears to be a more economically efficient use of scarce resources than the other alternatives analyzed. As noted previously under the discussion on "corridor management," the full management of two lanes in each direction, combined with the wide range of mobility options supported through Alternative 3, should be part of the analysis and discussion leading to a preferred alternative. the results of such a discussion should help achieve a high level of consistency between the final preferred alternative and adopted regional policy.	
L40	COST	2	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Financing Plan** While financial planning may be out of the direct scope of the EIS, addressing how to finance future corridor improvements remains an unresolved issue that will require resolution to advance any individual project components. The I-405 programmatic EIS analyzes the combined effects of complementary sets of investments within the I-405 study area, which will be made by numerous separate institutions. The recently adopted Metropolitan Transportation Plan, Destination 2030, requires that certain candidate projects undergo various analytical and project management steps prior to being designated an "approved" project within the regional plan. 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 (p. A 6-3)	Projects that make up the Preferred Alternative will be processed for inclusion in PSRC's *Destination 2030.* Project components could be funded through federal, state, regional, local, and private sources, and some revenues may require voter approval. It is unlikely that funding commitments for a majority of the projects will be known prior to completion of the Final EIS. Potential funding sources will be identified in the implementation plan and be included in the final recommendations report.

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				Additionally, federal and state metropolitan transportation planning laws are consistent in requiring that all regionally significant projects and programs that are "approved" in an adopted metropolitan transportation plan be financially feasible. The criteria for approving a demonstration of financial feasibility in the plan is described in Destination 2030 by saying that... "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)." (p. A 6-6) To further assist in making progress to advance the I-405 corridor improvements toward implementation, it is recommended that a financing plan for the overall corridor be developed. A corridor financing plan would be based upon rigorous and understandable methodologies and would detail the strategy by which all the investments included in the preferred alternative might be phased and implemented. It is desirable that a financial plan contains some assessment of financing options, risk and potential repercussions on overall regional financing capacity to implement other transportation projects.	
L40	O	6	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Candidate/Approved Project Status** It is understood that WSDOT and its corridor study team will be conducting further project-level EIS planning beyond the I-405 Corridor's programmatic EIS, and that this more detailed planning will build upon decisions from this current process to produce more specific project and/or program recommendations to advance specific modal improvements. These more detailed project environmental documents, along with resolution of currently unresolved programmatic issues mentioned above in our letter, will provide the essential specificity to enable Regional Council reviews to consider changing the project status of the refined components of the I-405 Corridor Program in Destination 2030 for "candidate" to "approved".	Thank you for your comment.

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L40	O	7	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	In conclusion, the Regional Council would like to again thank the study team for their commitment to developing and executing a process leading to this comprehensive analysis of the I-405 corridor and its future needs. The Regional Council anticipates being a strong advocate for full implementation of a wide-ranging corridor strategy, and hope to assist you as a resource in developing the further analyzes that will help deliver important transportation improvements to residents of the central Puget Sound region. If you have questions about any of our comments, please call me at 206-464-7134 or King Cushman (206-464-6174) or Kevin Murphy (206-464-6411) at the Regional Council.	Thank you for your comment.
L40	LU	3	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Urban Growth Areas:** RG-1 Locate development in urban growth areas to conserve natural resources and enable efficient provision of services and facilities. Within urban growth areas, focus growth in compact communities and centers in a manner that uses land efficiently, provides parks and recreation areas, is pedestrian-oriented, and helps strengthen communities. Connect and serve urban communities with an efficient, transit-oriented, multimodal transportation system.	Regarding the different levels of support among the action alternatives for the regional policies, the following underlying objectives existed for each alternative. The alternatives focus on different levels of infrastructure improvements (including TDM programs) within the Urban Growth Boundary, providing varying levels of accessibility for the movement of goods and people. The different levels of support are generally discussed in response to comment L40.LU-2. The consistency review is discussed in the Final EIS Section 3.13. In regard to the RG-1 Urban Growth Areas Policy, The transportation investments proposed by the Preferred Alternative are focused exclusively within the urban growth area to support efficient access and improved mobility within and between the designated Urban Centers, Activity Centers, and Industrial/Manufacturing Centers. Development of a new bus rapid transit system is a key element of this investment package. This is supported by a substantial increase in local bus transit service (approximately 75 percent above the current King County 6-year plan), improved arterial HOV priority for transit, additional park-and-ride capacity, new transit centers and capacity improvements, freeway HOV and BRT direct access ramps, completion of the HOV freeway-to-freeway ramps along I-405, and a variety of pedestrian and bicycle connections. This combination of investments will advance the Eastside transportation system and land use patterns toward a much more efficient, transit-oriented, and multimodal emphasis as envisioned by *VISION 2020, Destination 2030,* and the Multicounty Planning Policies.

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					This multimodal emphasis, combined with an expanded package of aggressive TDM measures, intelligent transportation system improvements, truck freight traffic improvements, and general purpose improvements on I-405, SR 167, and adjoining segments of freeways that connect to I-405 will provide the mobility improvements needed to help accommodate planned growth and development within the urban areas consistent with adopted regional and local land use plans. These focused investments inside the urban growth area will also help local jurisdictions and the designated Urban Centers to absorb growth and increase density of households and employment while meeting their requirements under the GMA's concurrency guidelines, rather than allowing pressure to increase for unplanned development at the urban fringe or in rural areas outside the urban growth boundary.
L40	LU	4	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Contiguous and Orderly Development:** RC-2 Coordinate provision of necessary public facilities and service to support development and to implement local and regional growth planning objectives. Provide public facilities and services in a manner that is efficient, cost-effective, and conserves resources. Emphasize interjurisdictional planning to coordinate plans and implementation activities and to achieve consistency.	Regarding the RC-2 contiguous and orderly development policy, the action alternatives were based on the priorities of *VISION 2020, Destination 2030*, and the Multicounty Planning Policies. The proposed freeway lanes and adjacent arterial elements contained in Alternatives 2, 3, and 4, and the Preferred Alternative provide improved access and reduced congestion for local and regional trips. The substantial new investment in high-capacity transit contained in Alternatives 1, 2, and 3, and the Preferred Alternative, coupled with proposed arterial HOV lanes and the addition of direct access and queue bypasses for the buses, improve the reliability and travel time for the transit users. In particular, the combination of freeway and arterial improvements, HOV improvements, TDM programs, BRT high-capacity transit, and HOV and BRT direct access ramps contained in the Preferred Alternative provides a well-integrated system of cost-effective public

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					facilities that support regional and local planning objectives. Facilities and services in the I-405 Corridor Program alternatives can reduce or eliminate anticipated local roadway "concurrency" deficiencies under the GMA. Alternatives 1 and 2 are likely not sufficient to fully offset future needs for mobility improvement and congestion relief. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. The Preferred Alternative provides the highest level of benefit in accommodating continuous and orderly development by congestion reduction, air quality improvement, HOV reliability, and improved urban accessibility of the action alternatives analyzed.
L40	LU	5	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Regional Capital Facilities:** RF-3 Stategically locate public facilities and amenities in a manner that adequately considers alternatives to new facilities (including demand management), implements regional growth planning objectives, maximizes public benefit, and minimizes and mitigates adverse impacts.	Regarding the RF-3 Regional Capital Facilities Policy, the action alternatives were generally designed to advance the objectives of PSRC policies, countywide planning policies, *Destination 2030*, and local comprehensive transportation plans. Some of the key components of the MTP related to I-405 are direct access ramps to existing freeway HOV lanes, development of arterial HOV systems, facilities for pedestrians and bicycles, travel demand management actions, intelligent transportation system improvements, and establishment of a high-capacity transit system along congested corridors that connect the designated Urban Centers. Regional capital facilities and the overall development of the core Urban Centers are called for in the Multicounty Planning Policies. A specific example of a city undertaking capital improvements to emphasize its Urban Center is the City of Renton. The City is partnering with transit agencies and private developers to construct mixed-use developments, which are transit-supportive land in the City's designated Urban Center. However, these initiatives may not adequately respond to market demand and could be less successful if the local and regional users do not have effective and reliable access to the center. The I-405 Corridor Program Preferred Alternative's transit emphasis coupled with improvements to SR-167 and local arterials are necessary to improve such access and mobility to complement the transportation needs of this high-density, mixed-use development.

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					The capacity of the existing transportation network within the study area is a limiting factor when considering increased development densities. Furthermore, GMA's concurrency requirements mandate adequate infrastructure be in place within six years of any new development that increases traffic congestion to unacceptable levels as defined by the level of service adopted by each jurisdiction. The Preferred Alternative includes the balanced system of multimodal transportation improvements that best accommodates the projected growth in the UGA. The BRT system proposed in Alternative 3 and the Preferred Alternative is expected to provide ridership and mobility benefits similar to the fixed-guideway HCT system in Alternatives 1 and 2, but at a substantially lower cost.
L40	LU	6	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Housing** RH-4 Provide a variety of choices in housing types to meet the needs of all segments of the population. Achieve and sustain an adequate supply of low-income, moderate-income and special need housing located throughout the region.	Regarding the RH-4 Housing Policy, the action alternatives would not improve the housing supply; however, they would expand and improve the range of multimodal options providing access to existing and planned residential and mixed-use areas in the I-405 corridor. The transportation investments contained in the Preferred Alternative are expected to encourage and accommodate greater density within the UGA and designated Urban Centers. This is necessary to justify greater levels of transit service and higher-order HCT technologies in the long term, which can also support improved supplies of low-income, moderate-income, and special needs housing. In the nearer term, the BRT system proposed in the Preferred Alternative is more flexible than the fixed-guideway HCT systems; thus it can provide greater responsiveness to the needs of emerging residential areas, especially those providing affordable housing at higher densities. Additionally, there are bicycle and pedestrian crossings in all of the alternatives that focus on promoting connectivity and preventing isolation of neighborhoods within the corridor program.

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L40	LU	7	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Rural Areas:** RR-5 Preserve the character of identified rural areas by protecting and enhancing the natural environment, open space and recreational opportunities, and scenic and historic areas; support small-scale farming and forestry uses; permitting low-density residential living and cluster development maintained by rural levels of service. Support cities and towns in rural areas as locations for employment, mix of housing types, urban services and cultural activities.	Regarding the RR-5 Rural Areas Policy, PSRC and GMA policies generally do not support additional growth in the designated rural areas, but direct higher densities within much of the I-405 corridor study area and its Urban Centers, Activity Centers, and Industrial/Manufacturing Centers. Alternative 3 and the Preferred Alternative provide the best opportunities to preserve the character of the rural areas by focusing multimodal transportation investments well within the UGA to increase connectivity and mobility within and between the designated centers. This helps reduce pressure for unplanned development at the urban fringe or in rural areas outside the urban growth boundary. These targeted transportation investments also help local jurisdictions and the designated Urban Centers to accommodate planned growth and increase density of households and employment while meeting their requirements under the GMA's concurrency guidelines.
L40	LU	8	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Open Space, Resource Protection and Critical Areas:** RO-6 Use rural and urban open space to separate and delineate urban areas and to create a permanent regional greenspace network. Protect critical areas, conserve natural resources, and preserve lands and resources of regional significance.	Regarding the RO-6 Open Space, Resource Protection & Critical Areas Policy, the Preferred Alternative has fewer overall wetlands impacts than Alternatives 2, 3 and 4, and fewer stream encroachments than Alternatives 2 and 4. The protection and preservation of the critical areas are a high priority of the I-405 Corridor Program. As the corridor projects progress, the designs will be completed with critical area avoidance as a priority, and mitigation measures will most likely include enhancement or consideration of additional passive open space uses. The corridor program, through effective mitigation, can provide opportunities for enhancement of open space, greater resource protection, and improvement in the functions of some critical areas. For a programmatic comparison of natural resource impacts of the alternatives please see the following sections of the I-405 Corridor Program Final EIS: • Water Resources (Section 3.5); • Wetlands (Section 3.6); • Wildlife, Habitat, and Upland Endangered Species (Section 3.7); • Fish, Aquatic Habitat, and Threatened and Endangered Fish Species (Section 3.8); • Farmland (Section 3.9); • Flood Plains (Section 3.10); • Shorelines (Section 3.11); and • Cumulative and indirect effects on critical resources (Section 3.23).

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L40	ECON	1	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Economics:** RE-7 Foster economic opportunity and stability, promote economic well being, and encourage economic vitality and family wage jobs while managing growth. Support effective and efficient mobility for people, freight, and goods that are consistent with the regions growth and transportation strategy. Maintain region-wide information about past and present economic performance. Assess future economic conditions that could affect the central Puget Sound region.	As noted in the Draft EIS Section 3.16, Economic Impacts, Alternative 3, which is similar to the Preferred Alternative, would have some positive effect on the overall regional economy, but not a negative effect beyond short-term construction impacts. "… transportation investment generally has a small positive effect on regional economic output. Business growth associated with highway investment can be attributed to increased productivity through improved access to markets, an increase in available inputs and labor, decreased travel time, and increased mobility throughout a region. A firm's decision to relocate is based in part on the availability of those benefits and can result in decreased prices for consumers, increased wages for workers, and greater product innovation. Congestion is often cited as an important factor in firms' decisions to locate in an area and in the locational decisions of highly skilled workers. While congestion is a cost that is passed on to consumers, market density provides substantial cost savings that also can be passed on." The Preferred Alternative can provide improved access and decreased travel time for SOVs, HOVs and freight trips in the UGA. This translates into support of the market density statement, referenced in the quote above, which is to continue and improve service/access to the regional Urban Centers, their housing density, employment density, and support services. The Final EIS concludes that the Preferred Alternative will protect economic stability through capacity maintenance and expansion, while meeting other goals of the region on land use, natural resources, housing, employment, and overall economic viability.

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L40	TR	7	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Transportation:** RT-8 Develop a transportation system that emphasizes accessibility, includes a variety of mobility options, and enables the efficient movement of people, goods and freight, and information. Four Sub-categories of Adopted Multicounty Transportation Policies 1. Optimize and Manage the Use of Transportation Facilities and Services 2. Manage Travel Demand addressing Traffic Congestion and Environmental Objectives 3. Focus Transportation Investments Supporting Transit and Pedestrian-Oriented Land Use Patterns 4. Expand Transportation Capacity Offering Greater Mobility Options	The Draft EIS alternatives were compared with the multicounty transportation policies and were found to be compatible in most instances.
L40	CU	2	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Clarify Use of Demographic Forecasts:** Section 3.23.3.5, 2nd paragraph. The Regional Council's FAZ forecast allocations (using DRAM/EMPAL) are not "based on the share of the state's population growth allocated to each county within the study area by the State Office of Financial Management (OFM)." The Regional Council prepares regional forecasts of population and employment and allocates them to FAZs using DRAM/EMPAL. The county totals are not controlled, but are aggregations of the FAZs. The Regional Council's forecasts are consistent with the OFM forecasts in the sense that they are developed in consultation with OFM and lie between the OFM minimums and maximums.	The Final EIS clarifies the procedure undertaken by PSRC, which is as follows: The Regional Council prepares regional forecasts of population and employment and allocates them to the Forecast Analysis Zones (FAZs) using the DRAM/EMPAL model. The county forecast totals are not controlled, but are aggregations of the FAZs. The Regional Council's forecasts are consistent with the OFM's minimum and maximum projections.
L40	CU	3	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Clarify Households:** Page 3.23-8, bottom paragraph. In 2030 there will be about 2 million households, but the number added between 2000 and 2030 is 780,000.	Within the Final EIS Sectopm 3.23.3.2, the numbers have been verified and corrected accordingly.
L40	CU	4	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Clarify Potential Misinterpretation of Growth Maps:** Figure 3.23-4 (and others). It is potentially misleading to overlay the UGB over a "Growth by FAZ" thematic map. It looks like there is substantial growth forecast outside the UGB. The problem occurs because FAZ boundaries do not match the UGB. The solution would be to mask out those parts of FAZs which lie outside the UGB.	The household and employment projections for local cities and FAZs have been detailed in the Final EIS. The graphics have been revised outside of the UGB to reflect the actual numbers.

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L40	CU	5	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Need to Add Scale to Distinguish Growth of VMT and Lane Miles:** Figure 3.23-14. This figure is potentially misleading because it looks like the Daily VMT has grown much faster than the Lane Miles. Using the same vertical scale for both measures causes this. The solution would be to use the secondary (right-hand) vertical scale for the Lane Miles - with appropriate values so the starting points (1982) are in approximately the same place.	This figure has been modified in Secion 3.23.3.6 the Final EIS.
L40	CU	6	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Qualify Interpretation of Land Use Change:** Figure 3.23-12 (and others). The DEIS analysis of land use "differences" should be clarified and qualified to indicate that it was based on incomplete model runs which were prepared for WSDOT only to show potential directions of change, i.e., where development "pressures" might be different under the various scenarios, but it was not a complete forecast as such would have required much greater fine tuning and further iterations of land use models to make more specific adjustments. This figure's legend (and similar legends) imply that the changes are based on completed forecasts. Such qualification/correction should be noted in the FEIS.	The land use model was run based on the constraints of the regionally accepted and locally adopted comprehensive plan numbers on housing, employment, and population. This approach has been clarified in the Final EIS om Sectopm 3.23.3.5. The model utilized in the I-405 Corridor Program is a tool that produces general results that reflect the potential change in pressures on the projected growth.
L40	CU	7	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Correct VMT Number:** Page 3.23-53, second paragraph. Under Destination 2030 the VMT for 2010 is 79 million miles, not 112 million. Of course, this changes the comment as well.	This has been corrected in the FEIS.
L40	TR	8	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	**Clarify Alternatives Description:** Appendix A, page A-3. The second #2 (yes, somehow there are two number 2s) has two nearly identical sentences ascribing different percentages. Judging by the description in Chapter 2, Table 2.2-1, it appears that the first of the two sentences (showing 25%) should be deleted.	This has been corrected in Appendix A of the FEIS.
L40	TR	9	Norman Abbott 1011 Western Ave., Suite 500 Seattle, WA 98104-1035 Agency: Puget Sound Regional Council	Appendix A, page A-9. #11 says, "Add up to 2 general purpose lanes… " Does this mean it would be less than two in places because of the number of existing lanes? Is this something to be clarified and resolved as part of the unresolved Balance Lanes issues?	Your assumption is correct. The exact number of required lanes will vary by location due to lane balancing and volume changes. Several of these details have been resolved during the evaluation of the Preferred Alternative in the FEIS.

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L41	O	1	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	We have reviewed the draft programmatic Environmental Impact Statement (EIS) for the proposed Interstate 405 Corridor Program in accordance with our responsibilities under the National Environmental policy Act (NEPA) and §309 of the Clean Air Act. The draft EIS examines the proposed implementation of a multi-modal system of transportation improvements to reduce traffic congestion in the Interstate 405 (I-405) corridor, which ranges from Tukwila on the south to Lynnwood on the north, in King and Snohomish counties, Washington. The programmatic EIS analyzes broad issues such as corridor selection; mode choices and strategies; general location of the many possible improvements; and the environmental impacts of five proposed alternatives. We are approaching a decision point in the development of a programmatic plan for what might be the largest major transportation corridor upgrade in the Puget Sound region over the next several decades. The programmatic EIS covers a corridor more than 30 miles long, and will be used as a reference document for many years to come. This project is also a pilot project under the Federal and State NEPA reinvention process, wherein elected officials, citizens and agencies with jurisdiction are all engaged in a joint planning process. This is a unique moment where we can all take the broadest possible look at the tools and strategies presently at our disposal to find the combination that will provide the best long-term, sustainable solution for the I-405 corridor.	Thank you for your comment.
L41	SOL	1	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	EPA, Region 10's publication entitled "Transportation Planning in the Northwest: Framework for Suitability" (January 200) encourages transportation planners to seek creative solutions and provide transportation options that may extend beyond mode choices to zoning, land use, and social and economic policy measures. Two Northwest Environmental Watch publications, "This Place on Earth 2001: Guide to a Sustainable Northwest" (April 2001), and "The Car and the City" (April 1996) effectively discuss the nexus between transportation and land use. The publications assemble and discuss a broad array of principles that range from some of the	TDM strategies are prominent within each of the action alternatives. Pricing strategies are included in Alternative 1. Please note that for reasons not related to the potential performance of the pricing strategies, Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program. This is because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.

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				Transportation Demand Management (TDM) proposals considered in the Draft EIS to other measures such as taxation. While not transportation choices, we believe that such policies are essential to any sustainable long-term transportation solution for the I-405 corridor, because there is no other choice. We strongly encourage you to take this broadest possible view of solutions as the I-405 corridor program moves through planning and implementation. The TDM analysis found in the transportation expertise report and Appendices discusses the importance of strategies such as the use of proximate commuting that show great potential. EPA, Region 10 is prepared to assist the project team if desired in seeking Federal grant funding for proximate commuting or other employer-based TDM pilot projects.	
L41	ALT	1	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	The draft EIS identifies five alternatives. We have rated the alternatives presented in the EIS as follows: (see table in original correspondence)	Please see responses to your letter below.
L41	O	2	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Our ranking for the No-Action alternative is based on our understanding that the projects comprising this alternative are already approved and funded, and that NEPA decisions have already been made. Our ranking for Alternative 1 is based upon the comparatively lighter scale of impacts, compared to alternatives 2, 3, and 4. Our ranking for Alternative 2 is based upon the scale of impacts to aquatic resources which include cumulative impacts to already urbanized watersheds from the creation of new impervious surface, effects on wetlands, riparian areas, streams, and stream habitat. We base our environmental objections to alternatives 3 and 4 on several factors. The first of them is the possible greater severity of impacts to the aquatic environment, including greater long-term cumulative impacts to urbanized watersheds from new impervious surface, effects on wetlands, riparian areas, streams, and their habitat. The second objection is that assessments of impacts for some aquatic resources (wetlands, floodplains and impervious surface) and cumulative impact lack sufficient data for reviewers to determine impacts, and that many resources lack assessments of impact.	The analyses of impacts were conducted consistent with the methodologies reviewed and approved in advance by the I-405 Corridor Program Steering Committee, which is comprised of local jurisdictions and the state and federal resource agencies, including EPA. For several aquatic resources such as wetlands, fisheries, water quality, and impervious surface, the analyses that were conducted for the Draft EIS were substantially more rigorous and detailed than even those originally approved by the Steering Committee. Based on this, the analyses are believed to be adequate and appropriate to the corridor-level decision; that is, to determine the best mix of modal solutions, transportation investments, and demand management to improve movement of people and goods throughout the I-405 corridor, reduce foreseeable traffic congestion, and satisfy the overall purpose and need. As discussed on page S-2 of the Draft EIS, follow-on NEPA and SEPA environmental analysis, documentation, and review will be prepared to enable decisions regarding site-specific, project-level details on alignments, high-capacity transit technology, project impacts, and mitigation measures.

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L41	SOL	2	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Finally, these alternatives, in our view, do not take a careful enough look at environmentally preferable solutions; those that may meet the project purpose and need while avoiding or minimizing environmental impacts.	As one of the pilot projects under the "Reinventing NEPA" process, the I-405 Corridor Program had to obtain written approval (concurrence) of the alternatives advanced for detailed evaluation in the Draft EIS from agencies with jurisdiction prior to proceeding with the Draft EIS. As part of reaching concurrence on the range of alternatives, Alternative 1 - HCT/TDM Emphasis, was developed with substantial participation by state and federal resource agencies. The stated goal of Alternative 1 is to minimize the addition of new impervious surface from general purpose transportation improvements and to encourage transit use within the study area. EPA was among the more than 20 local jurisdictions and state and federal agencies that concurred with the range of four action alternatives to be evaluated. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.
L41	ALT	2	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	The draft EIS does not identify a preferred alternative. We recommend that the Federal Highways Administration select a preferred alternative that resembles Alternative 1 or 2, and that the programmatic EIS and Record of Decision reflect the adoption of this alternative.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L41	O	3	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	We also recommend that whatever alternative the Federal Highway Administration ultimately selects as the preferred alternative, the agency emphasizes an adaptive management approach to the I-405 corridor program. Under this approach, the programmatic document provides a framework for making final mode choice decisions, but calls for evaluation of initial project modes as they are built and operated, prior to determining what the next steps might be. Project elements and their order of implementation can adapt to changing conditions as the corridor program progresses and avoid decisions that may not be effective at achieving the project purpose and need as conditions change.	See comments from Puget Sound Regional Council, L40, and response to comment L41.SCH-2. The environmental program includes an objective that emphasizes use of adaptive management techniques both for mitigation actions and for transportation implementation.

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L41	SOL	3	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	You should develop and describe a proposed step-by-step implementation in the EIS that emphasizes a corridor-wide intensive effort at non-structure, least-cost solutions first, particularly a coordinated TDM effort that involves all local jurisdictions in partnership with State and Federal agencies and the Executive Committee; then identify solutions for specific trouble spots along the corridor; and third, focus on an additional mode for the corridor, transit, in whatever forms or designs are determined to be most effective. Only after these have been done should the program move to modes presently in place but working less and less well over time (HOV-2 and general purpose lanes).	See the response to comment L41.SCH-2.
L41	O	4	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	We believe that setting out a specific implementation plan that uses an adoptive management strategy maximizes opportunities for subsequent adaptive project management and potential changes in mode emphasis if necessary, as elements are constructed and operated and we have a chance to evaluate how they perform. We believe that this approach is both consistent with the programmatic EIS concept, consistent with farsighted planning and resource management, and more likely to result in an environmentally preferable solution. Transportation planning is a continually evolving undertaking, as it must be able to adapt to changing growth patterns, changes in travel and technology and political, social and fiscal trends. Using an adaptive management approach would facilitate better decisions by allowing the corridor program to adapt to changing conditions, rather than require all decisions to be made now. This is particularly important since solutions will be implemented over an extended period of time (e.g. 20 years). In the enclosed attachment, EPA has specific comments about preferred project elements, as well as more detailed comments about the draft EIS.	See the response to comment L41.SCH-2.

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L41	O	5	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	The draft EIS contains a draft list of individual proposed projects along the I-405 corridor which is not discussed in great detail in the EIS. (Appendix B, I-405 Corridor Program EIS Alternatives Project Matrix). If EPA concurs with a preferred alternative, we wish to clarify that we are not concurring that all projects on this list, as proposed, as hereby being committed to. The final EIS should clearly document that future planning will include, if necessary, re-examination the need for these projects on an individual basis, consistent with the need for future planning for the I-405 corridor program to be capable of adaptation to changing conditions. We expect that these subsequent decisions would require additional NEPA documentation prior to decisions or action.	As discussed on page S-2 of the Draft EIS, follow-on NEPA and SEPA environmental analysis, documentation, and review will be prepared to enable decisions regarding site-specific, project-level details on alignments, high-capacity transit technology, project impacts, and mitigation measures. This will include, if necessary, reexamination of the need for the projects on an individual basis to enable adaptation to changing conditions.
L41	O	6	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	As a final comment, we have serious concerns with the proposed schedule for making a final decision on the preferred alternative. The comment period closes on October 24, 2001. Washington Department of Transportation's (WSDOT's) schedule indicates that the steering committee intends to make a preferred alternative decision on November 8, 2001, just two weeks after the close of the comment period. This is, in EPA's view, an unreasonably short period to adequately view and respond to all the public comment, and craft a preferred alternative, particularly if that alternative is substantially different from the alternatives analyzed in the EIS. This schedule may also give the appearance to the public that the public comment period is merely a formality and that their comments may not have been appropriately considered before the preferred alternative is selected. We question whether it is worth the risk of making such a hasty decision on an EIS that may be the wrong one, particularly when this decision would determine the fate of improvements on the I-405 corridor, a critical link in Puget Sound's transportation network, for the next twenty years or more.	Public and agency comments are taken very seriously, and all feedback received has been considered very deliberately. Identification of the Preferred Alternative included consideration of over 2,000 individual public and agency comments. It was necessary to identify a Preferred Alternative in a timely manner so that it could be evaluated in the Final EIS and the corridor mitigation program could be developed with participation of the local jurisdictions and state and federal agencies. To further ensure that the Preferred Alternative was an effective and responsible choice, the request for concurrence on the Preferred Alternative and mitigation concept by agencies with jurisdiction as part of the "Reinventing NEPA" process was delayed approximately four months until evaluation of the effects of the Preferred Alternative was complete and the mitigation concept and commitments were in place.
L41	TR	1	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page S-11, Transportation Demand Management (TDM) Effects: The text states that the effects of a TDM program are not known. While you do show some data, it is surprising that the document is so vague about overall effects. Data certainly is available from previous TDM efforts to gain a good general idea of what expected effects might be. It is difficult for the public to compare alternatives, comment on the EIS and have an informed opinion about how the alternatives might address the purpose and need without having a clearer idea of how well the proponents think one of the project's key components might perform. It also makes it more difficult for	The Transportation Expertise Report provides additional discussion of the TDM effects. The expected effects are based upon established empirical and research findings. The findings showed up to a 10 percent possible vehicle trip reduction during the peak periods, with about a 5 percent vehicle trip reduction on a daily basis - a substantial and measurable amount.

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				decision makers to use the document to select a preferred alternative. A more in-depth effort at estimating and discussing TDM effects should be integrated into the document and made available to the public before a decision is made on a preferred alternative. Integration is critical because this is a programmatic EIS, and will to be used as the key reference source on the project for years to come as individual I-405 features are designed and built. A clear estimate of TDM effects could be used as a benchmark for measuring success or failure of measures, and as a starting place for development of alternative adaptive strategies if TDM effects are not successful.	
L41	SOL	4	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page S-12: Why did the corridor analysis assume that any additional lanes proposed for 405 would be added to the entire length? This eliminates the possibility that added lanes might only prove necessary for parts of the corridor.	The analysis for the freeway lanes included in each alternative examined the relative volumes and impacts for each segment along I-405. Additional work was performed on lane balance issues throughout the corridor during the development of the Preferred Alternative. There are several segments along I-405 that will require more or fewer lanes based upon traffic and operational characteristics.
L41	SCH	1	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	The EIS is a programmatic document that seeks to make overall decisions about mode choices and the shape of improvements on the I-405 corridor for the next 15-20 years. The Draft EIS states that the work would be started within several years and completed from about 2015 to 2023, depending on the alternative. The Draft EIS also proposes alternatives, each of which consists of a group of actions and strategies that would be implemented over time. Thus, whatever alternative is finally chosen, even No-Action, the components that comprise each alternative will be implemented in phases over a period of years as funding and approvals are finalized. Accordingly, the EPA proposes that the programmatic EIS not only make mode choice decisions, but contain an implementation strategy where the preferred alternative explicitly describes and incorporates the principles of adaptive project management directly into the alternative itself. This strategy would discuss how the mode choices would be implemented, propose an order for their implementation, and set up a process that requires analysis of data from the first program implementation steps and iterative decision making on subsequent steps or modes before additional construction is approved.	Thank you for your comment. An implementation plan will be prepared on the Preferred Alternative that includes the elements outlined in your letter. Supplemental environmental documentation will be required for many of the projects that make up the Preferred Alternative.

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L41	SCH	2	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	The adaptive project management approach would accomplish two things. It would allow the Project team and Executive Committee to check in and see how well phases are operating by including a period of post-implementation traffic congestion and safety condition evaluation. This would provide important feedback before determining whether to proceed to the next phase in the alternative. Second, it would be possible, if conditions warrant, to avoid full-built-out, to realize both fiscal savings and avoidance of environmental impacts. The EIS states that a similar approach has been used in the Destination 2030 Metropolitan Transportation Plan (PSRC 2001; EIS; Page 3.23-6). Further, this approach is being utilized in planning for the SR 104, SR 101 to Kingston EIS (July 2000). The adaptive management approach would allow the needed flexibility to adapt to changing needs on the I-405 corridor over time. We believe that this approach is both consistent with the programmatic EIS concept, and necessary to meet transportation planning needs. As we stated in the cover letter, the planning of transportation projects must constantly evolve to adapt to changing conditions. A mode choice or design that made sense even 5-10 years ago may no longer make sense today if conditions have changed, and it is reasonable to expect that a mode choice that made sense today may, in 10-15 years, no longer be the right solution. In reality, many transportation mode decisions are currently made on an iterative basis. Writing an adaptive project management implementation plan into the programmatic document would codify the plan and make it transparent to all present and future decision makers, reviewers, and the public. The programmatic EIS should serve as a reference document and a guide for better future decisions, not a document that forces all decisions to be made now and prevents future re-examination. The EIS, as it presently reads, appears to make many decisions now that would be impossible to change later on.	Advancing project elements of the Preferred Alternative from "candidate" to "approved" status in the Puget Sound Regional Council's Destination 2030 Metropolitan Transportation Plan will require coordination for implementation and ultimate approval for funding. The ability to complete any of the chosen multimodal alternatives will depend upon funding availability. Funding required for implementation of major elements of the program will likely require legislative action and portions may require voter approval. Responsible jurisdictions also will have an influence on funding decisions, which will have an impact on project sequencing. Thank you for your comments on possible implementation strategies.

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L41	SCH	3	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	EPA proposes the following as a first draft of an implementation strategy and implementation sequence: 1. Aggressively employ Transportation Demand Management (TDM) strategies in an orchestrated effort with cooperation at all necessary levels (local government, regional transit agencies, state and federal agencies). Take time to study the results. Find out what is working and do more of it, reduce or drop measures that aren't performing or no longer make sense; 2. Provide long term construction projects for obvious problems, the highest congestion points, locations where there is a known remedy, such as the SR 167 interchange and others. 3. Develop and construct either a High Capacity Transit or Bus Rapid Transit line, or some other transit option(s) that run(s) the length of the entire corridor; 4. If the conditions still warrant, add lane capacity, but leave open the option of making them general purpose lanes or managed lanes until specific project planning takes place. Also, leave open the option of considering whether to propose improvements on the entire length of the program area or limiting the project to strategic locations where they would do the most good (such as where lane capacity is lower, south of I-90, for example).	Thank you for your suggestions. Including the Preferred Alternative modal projects in PSRC's MTP will generally accomplish the steps outlined in your letter. Again, availability of funding for the various modes will have a bearing on priorities and implementation.
L41	SOL	5	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	This proposal is fairly consistent with most alternatives analyzed in the EIS and the list of project elements shown in table 2.2-1. In our review of the information table 2.2.1, we request the following adjustments, regardless of which alternative is chosen: 1) Corridor-wide or even system-wide congestion pricing be part of any alternative selected. We recommend that congestion pricing be a system-wide element. WSDOT data on TDM effectiveness in the transportation analysis shows how effective transportation planners think it can be (Table 3.12-3; Alternative 1 TDM effects). We know that congestion pricing works; at the WSDOT sponsored Managed Lanes forum (September 6, 2001), regional and national experts demonstrated how the concept has worked and gained acceptance elsewhere, and they discussed how it can work on the I-405 corridor. This leads us to disagree with your conclusion (Page 2-22) that congestion pricing could not be effectively implemented as a corridor solution. We also fail to see how it does not meet the project purpose and need;	The Preferred Alternative includes further support for regional pricing solutions that could have effects in the I-405 corridor. Corridor pricing through tolls is not explicitly part of the Preferred Alternative.

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L41	SOL	6	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	2) The utility of BRT vs. HCT system should be examined in more detail to determine which would work better given the existing I-405 system, how environmental impacts might compare for each system, and whether they could work well together. Current research, including a study released by the General Accounting Office (October 2001) Suggest that Bus Rapid Transit may work as well as rail in many cases for less cost. However, in the case of the I-405 corridor, a potential rail line is already in place (the Burlington-Northern Santa Fe rail line). Using existing infrastructure is environmentally preferable and less costly than new construction. These factors all need to be considered;	Bus rapid transit (BRT) is the transit technology included in the Preferred Alternative. While the BRT will be focussed in the I-405 corridor, there may be segments of the BNSF that could become future transit corridors. This may be examined in future project-level studies, such as Sound Transit Phase 2. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe (BNSF) Railroad right-of-way. The I-405 Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. The Draft EIS included an examination of the BNSF as a commuter rail corridor and concluded that there would be limited ridership and several operational and safety issues to be resolved if the existing rail line were to be used for passenger rail purposes.
L41	SOL	7	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	3) Seriously consider eliminating the expansion of I-167 to the limits of the project study area, at least in the near term. While we support attempts to take care of the present congestion problem at the I-405 interchange, expanding I-167 beyond the immediate area is a separate action and decision that should not be justified soley on the basis of present congestion at the south end of I-405. If proposed improvements at the interchange were found not to be sufficient, then EPA would support reconsideration of improvements further south on I-167.	The Preferred Alternative includes expansion of SR 167 only south to 180th (i.e., the first interchange south), pending further studies of the SR 167 corridor. Some widening of SR 167 will be necessary to accommodate the improved design at the SR 167/I-405 interchange. Innovative freeway designs using stacking and other mitigation measures are being considered to minimize environmental impacts of the freeway expansion.
L41	AQ	1	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	EPA is pleased that Section 3.1 of the EIS includes an assessment of whether the program would have an effect on Puget Sound's ability to meet motor vehicle emissions budgets for ozone and carbon monoxide. This is appropriate for a project of this magnitude. EPA recommends revising the emissions estimates at some future date using MOBILE6 when Puget Sound Regional Council's (PSRC's) Travel Demand Model is updated. The new Travel Demand Model may have increased resolution and better land use features. PSRC's current Traffic Demand Model is at a relatively coarse scale where movements are modeled through corridors that may include several streets and roads. Thus it may not be as adept as other models in showing the relationship between Vehicle Miles Traveled (VMT) growth and land use and vice versa.	In the spring of 2002, PSRC refined the MTP adopted in 2001 (*Destination 2030*) to reflect the project elements of the Preferred Alternative. The revised modeling runs show regional emissions below the emission budgets for all pollutants in 2010, 2020, and 2030. The Mobile 6 emission model was recently released and has not yet been adopted for use in the Puget Sound Region. Because the Preferred Alternative is now included in the MTP, it will be analyzed using MOBILE 6 emission factors once PSRC adopts MOBILE 6.

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L41	AQ	2	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.6-6: Table 3.1-3: There should be some explanation why there is a 4.5% difference in carbon monoxide among alternatives yet there is virtually no difference for hydrocarbons and nitrogen oxides.	Differences between the emissions calculations for CO and for ozone precursors result in differences in sensitivity to VMT and speed. CO emissions are calculated for winter vehicle operations while the other pollutants are calculated for summer operations. As a result, CO emissions are more dependent on the number of vehicles in cold-start mode, trip length, and travel speed. VOC emissions, on the other hand, include evaporative emissions that are a factor of the warmer summer ambient temperature, but not affected by travel speed. The emission rates for CO are more sensitive to vehicle speed. As a result, the percentage changes in emissions among the various alternatives is greater for CO than for the other pollutants.
L41	WR	1	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Impacts to surface and subsurface water resources are a critical piece of the EIS's environmental analysis. The amount impervious surfaces in a drainage basin is often an indicator, often a direct one, of impacts to wetlands, streams, and fisheries habitat. The study by May et. al. (1997) cited in the report on Page 3.5-9 concludes that 10% impervious surface area is a working threshold for indicators of healthy stream and surface water function. The basins in the I-405 corridor have already been significantly impacted by urbanization. The EIS indicates that all of the basins in the study area are already well beyond this 10% threshold. Thus, changes in impervious surface in most of the watersheds crossed by the I-405 corridor can be seen as a surrogate for overall function of surface water, streams, riparian habitat and fisheries habitat.	Your comment is acknowledged and is consistent with the analysis in the EIS.
L41	WR	2	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	The water resources sections (as well as the EIS in general), need to make clear whether there is a significant impact to a resource and why. It should state more consistently the selected thresholds of significance e.g., a quantified or measurable impact, violation of a regulation or standard, or best professional judgement), and why the criterion was used. The CEQ regulations at 40 CFR Part 1408.27 list criteria for assessing whether impacts might be considered significant. Significance of impacts should be better standardized in the text across alternatives, or at least made easier to refer to. Specific examples are cited in the text below.	The I-405 Corridor Program Final EIS has been revised to identify more consistently how a quantified or measurable impact, violation of a regulation or standard, or best professional judgment was applied to the assessment of impacts and their magnitude. The discussion of impacts also has been revised to clarify the basis for conclusions regarding the magnitude of impacts for each resource and alternative.

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L41	WR	3	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	It is critical that a final mitigation concept is chosen for surface and groundwater impacts and the development and implementation of this concept be committed to in the EIS and Record of Decision. It needs more detail than it presently has, and some important questions need to be answered. Specific examples are below.	Section 3.5.5 of the I-405 Corridor Program Draft EIS contains nearly four pages of mitigations, many applicable to specific alternatives. A process for applying off-site basin or Water Resource Inventory Area (WRIA)-level mitigation has been outlined in Appendix J of the I-405 Corridor Program FEIS. More detailed mitigations will be developed in the environmental documentation prepared for the individual projects.
L41	WR	4	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-4, bullets at top of page: The first two bullets lay out specific thresholds for significance (or 'potentially serious', 'substantial increase'), but the third bullet does not define what a 'substantial increase' is.	"Substantial increase in impervious area" is defined under the second bullet in Section 3.5.2.1 (immediately above the bullet in question) as one percent or greater of total basin area. This verbiage has been added to the third bullet.
L41	WR	5	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-4, bottom, and Page 3.5-5, top: The first set of bullets is an appropriate initial screen, but the fourth bullet leaves the definition for 'substantially reduce' flow to groundwater-fed water resources undefined.	Quantifiable data measures combined with professional judgment were used to develop qualitative assessments of the impacts to groundwater quality and quantity. See response to comment L38.WR-2.
L41	WR	6	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-12:Impacts for the No-Action Alternative should be shown in this table and also totaled with impacts for each Alternative. The EIS should provide a clear representation of the sum total of all impacts actually taking place on the ground.	The No Action Alternative lists projects and associated impacts that will occur under the future baseline conditions, with or without the I-405 Corridor Program. An impact analysis concentrates on those impacts that will occur above and beyond future baseline conditions.
L41	WR	7	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-12 Groundwater Section: In this case you have stated a logical and legal significance threshold. What would be the impacts of construction of the arterial in the 10-year capture zone for the Maplewood Wells be? What measures can be taken to avoid or minimize impacts? All efforts should be taken to avoid this impact. This also applies to groundwater sections for other alternatives (Pages 3.5-14, 19, 21, 23)	Detailed analysis and evaluation of impacts related to specific projects within the Preferred Alternative will be conducted during the future project-level environmental analysis, review, and documentation. See response to comment L38.WR-2.
L41	WR	8	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-12, Groundwater Section: The text discusses potential for a 'slight increase' in operational impacts, based on the approximate impact of Alternative 1 being only 12% of the current project impervious surface total. First this sentence is confusing. Clarify what alternative 1 is 12% of, and then state your justification for why 12% is negligible.	Section 3.5.4.2 of the I-405 Corridor Program Final EIS has been revised to clarify the loss of recharge area for Alternative 1 as well as in subsequent sections for Alternatives 2 through 4.
L41	WR	9	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-19, first paragraph: Do you consider the impervious area doubling compared to Alternative 1 a significant increase?	Doubling a number that is a small fraction of the total transportation infrastructure related impervious surface in the I-405 corridor still yields a small fraction of the current total impervious surface. The effects, if any, will be small. The "significance" is left to the decision-maker.

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L41	WR	10	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-19, bottom: This sounds like you are saying there is a significant impact to peak flows and dry season low flows which no mitigation could remedy. Clarify whether this is true.	Detaining project stormwater would avoid any substantial impact to peak flows. However, a substantial increase in basin impervious area (on the order of one percent or more) would decrease infiltration to the point where seasonal low flows could be substantially reduced, substantially impacting the stream unless mitigated. Wording has been added to this subsection specifically identifying impacts.
L41	WR	11	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-20, bottom of surface water section: In the statement "actual pollutant loadings to the surface waters in the project area would be lower than the amounts calculated for this project," do you mean that your loading calculations do not include existing treatment, as you say elsewhere (Page 3.5-21, 2nd paragraph from bottom of Surface Water Section; Page 3.5-23, 2nd paragraph)? If you are trying to say the same thing in all places, why not standardize the statement for each alternative?	The statements referred to in this comment now appear only once, in Section 3.5.2.1.
L41	WR	12	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-21 Surface Water Section, 2nd paragraph: Is the difference between 156 tons of solids generated (alternative 2), and 280 tons an important one? Over what time period of operation would these quantities be generated?	The units for the suspended solids pollutant loadings are tons per year (t/yr); this unit has been added. The calculated pollutant loadings allow an additional means for distinguishing the water resource effects among the alternatives. The specific impacts upon the receiving waters would require a highly localized analysis that is beyond the scope of this programmatic EIS.
L41	WR	13	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-21 Surface Water Section, 3rd paragraph: What is the level of significance, and to what level would mitigation reduce the impacts to temperature, base flows, and metals?	Alternative 3 would have substantial surface water impacts to South Kelsey and Springbrook creeks if not mitigated. However, mitigation measures would reduce these impacts to nonsignificant levels.
L41	WR	14	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-23, 2nd paragraph: Again, is 365 tons generated a significant difference from alternatives 2 and 3? Is this a significant impact in its own right?	Refer to the response to comment L41.WR-12.
L41	WR	15	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-24, 3rd paragraph: April 1st is too early in the season to construct in the dry in many locations in western Washington, even those outside wetter locations within 300 feet of a stream. Many seasonal wetlands and wetland fringe areas are at their most saturated condition in early April. This date would need to be moved forward into May or even June 1 or later in some cases.	A number of jurisdictions within the I-405 corridor require special wet-weather erosion control provisions through April 30. This mitigation measure has been changed to restrict grading near streams to the period between May 1 through September 30. The timing may be altered based on seasonal conditions that do not fit this schedule.

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L41	WR	16	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-25: A WRIA may be too much of a macro-scale method to handle impacts within specific waterways and sub-basins where impacts are occurring. You need to explain why this scale would be environmentally preferable, or ecologically beneficial (Page 3.5-26), in addition to being more cost effective. Is this, in your view, the only practical way to handle surface water impact mitigation? It may be much more effective to focus on problem areas, such as the approach you discussed specifically for Springbrook Creek (same page, above). Is there a basis for limiting development of a comprehensive plan to Springbrook Creek? Do impacts in other basins justify this focus?	The wording "In lieu of within-basin mitigation, a WRIA-wide approach to mitigation… ." has been modified to read "In addition to within-basin mitigation, a WRIA-wide approach to mitigation… .". The majority of the length of I-405 and many of the other road projects lie within the lower reaches of the streams they cross. Most of the area is also heavily urbanized. Therefore, stream mitigation opportunities tend to be limited, and needed stream and riparian land acquisition may be very costly. Thus mitigation measures accomplished at other locations within the stream basins or within the Water Resource Inventory Areas (WRIAs) themselves, may be much more effective. This may not totally replace on-site mitigation. Due to its extensive water quality problems, as well as the relatively high amount of new impervious surface, Springbrook Creek is recommended for a comprehensive restoration study. This study would identify special water quality, as well as flow, measures that new road projects should implement within this basin. Other basins are identified with base flow impacts that could be mitigated by emphasis upon infiltration, flow augmentation, or habitat improvements. It may be appropriate to carry out a basin study in one or more of these basins. The specific need for such a study would be identified and carried out in subsequent environmental documentation for specific road projects.
L41	WR	17	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.5-26: Second paragraph: Are base flows in other basins reduced to the point that stormwater infiltration should be done? Is it practical to do in all affected basins? If not, why not?	The six basins identified are the ones that would experience a substantial increase in impervious surface, diminishing summer low flows and meriting special measures to enhance infiltration or other flow-augmentation measures. However, infiltration typically cannot be effectively achieved on till soils. Much of the study area is underlain by till soils and would generally not be conducive to infiltration of treated stormwater. Refer to Figure 4-4 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report.
L41	WET	1	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	EPA believes that the level of information provided on wetland type and function is not adequate, even at the programmatic stage. Generally accurate if incomplete data on type is easily available through the National Wetland Inventory, as well as other more recent sources to make it possible to compare impacts across alternatives. Also, calculating wetland type and function is a prerequisite to first estimates of mitigation ratios. Without this data, reviewers can only guess where the most critical impacts might	The Final EIS presents the number of acres impacted per basin. Beyond this, the level of analysis is limited by the general and programmatic nature of the alternatives. The impact assessment compares relative levels of impact to wetlands under a worst-case scenario. The actual amount and location of impacts will not be known until the project design stage. Information on wetland type from the National Wetlands Inventory and other sources, where available, was utilized as indicated in Section 3.6.1.1 of the FEIS.

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				actually be, based on other generalized information in the document (numbers of crossings, descriptions of fragmentation, reviewer knowledge of specific system and locations). You state on page 3.6-15, mitigation ratios can vary from 1:1 to 6:1 or greater; the variability is directly correlated with wetland type and function. Mitigation ratios reflect the time it takes to replace some wetland types and functions (temporal loss – recovering full structure in forested wetlands may take as long as two or three decades), and the present difficulty and uncertainty of success with some systems or specific locations. Estimates of impacted wetland type and function should be included in the EIS.	The analysis adopted the "high and low priority wetland" rating to enable a consistent rating of wetlands that occur within multiple jurisdictions, each having unique rating systems. This approach was used to avoid confusion and allow a comparison of wetlands between jurisdictions. Calculating the function of wetlands to be impacted in more detail is premature when the actual location and area of wetland impacts are not known. Wetland type and function will be evaluated during the design stage when wetland impacts can be defined and a thorough analysis done on each wetland potentially affected by the individual projects.
L41	WET	2	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Finally, like the analysis of water resource impacts, the programmatic EIS should commit to developing a final mitigation concept for wetland impacts, describe the responsible parties and mode of implementation. The plan should be integrated with the plan for water resource impacts, since without effective stormwater and groundwater mitigation, wetland mitigation will have much reduced long term chance of success.	WSDOT is currently working on an "Early Action Environmental Impact Mitigation" strategy at a watershed or "programmatic" level. This mitigation strategy has been designed to coordinate closely with the WRIA 8 "Near-Term Action Agenda." The mitigation may provide large-scale off-site projects such as preservation of intact habitat that would benefit the overall watershed functioning, while allowing for transportation needs. In contrast, site-specific, on-site, in-kind mitigation will be negotiated with agencies and designed separately for each of the numerous individual projects in order to comply with local critical areas regulations as well as mitigation requirements typically required by local, state, and federal jurisdictions. Site-specific final mitigation concepts will be proposed for the numerous individual projects that are not yet designed. When specific mitigation designs are developed, integration with the water resources plan will occur.
L41	WET	3	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.6-7, first full paragraph: Lower priority wetlands may provide better opportunities for enhancement. Even more mitigation credit can be gained from restoring hydrology to former wetlands where hydrology has been removed by disturbance, or wetlands which may still have wetland hydrology but are highly degraded due to disturbance. If wetland restoration sites can be located, they can be preferable to enhancing existing, low priority wetlands.	This concept will be taken into consideration during project-level design. Wetland restoration has been identified as a possible and preferable wetland mitigation approach.
L41	WET	4	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.6-8, Table 3.6-2: Like the Water Resources Section, this Table should reflect both No-Action impacts and Action impacts and an impact total, in acreage and number. It is the best and fairest representation of all the impacts actually taking place on the ground.	Section 3.6 and Table 3.6-2 have been changed to reflect your request. Due to the inclusion of additional tables, in the Final EIS, Table 3.6-2 is now Table 3.6-5.

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L41	WET	5	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.6-10, top of the page: While we understand that you selected a worst-case scenario to cover and disclose the most severe possible impacts, some indication should be given as to a reasonable range of impacts, based on your evaluation of opportunities for the alignment to be elevated, technical feasibility in specific locations, and cost practicability. How elastic is this number? The analysis of adding additional lanes does not mention that some avoidance may be possible there. Would it also be possible to do similar avoidance measures for construction of separated BRT lanes?	Section 3.6.4.2 states that the wetland impacts could be much lower than the estimates provided. However, the text has been revised to better clarify that the impact areas are reasonable worst-case estimates and that less impact is possible (and likely) following design modifications. Because anything less than the reasonable worst-case estimates provided are possible, defining a meaningful range of possible impacts can not be better refined without project-level information.
L41	WET	6	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.6-12, top of page; Wetlands impacted by increased runoff, sedimentation and contamination, while not technically being destroyed directly by grading and filling, would be receiving continual damage by increasing inflows of contaminants from construction and operation of the new impervious surface, and ongoing damage from continual alternation of runoff periodicity. Some of these habitat effects, and contamination effects become apparent, and worsen through time.	Impacts to wetlands from increased runoff, sedimentation, and contamination were addressed under the operational and construction impacts subheadings of Section 3.6.4.1 in the Draft EIS.
L41	FATE	1	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.8-8, 2nd paragraph from bottom: This is one of numerous locations in Section 3.8 where the baseline for water resources, wetlands, and aquatic habitat is characterized. The text reads, 'the baseline condition for this impact analysis is not the existing condition," and you go on to state that the baseline condition includes projects that have not yet been constructed. We understand that these are separate actions that should not be counted in the impacts for this project. However, this is a somewhat confusing and difficult approach to follow for two reasons. First, the existing condition that you portray does not presently exist and may in fact never exist if there is an overlap between 'No-Action' alternative projects and I-405 program projects. Furthermore, it is conceivable that some no-action alternative projects may not be constructed. We recommend that you set the present conditions on the ground, those in place at publication of the EIS, as existing conditions, yet still make sure to clearly differentiate between the contributing impacts of the I-405 program and the No-Action alternative throughout the document.	The No Action 'baseline" condition includes those projects that have been substantially committed, having already been funded and were previously subjected to environmental analysis, documentation, and review. Their impacts to aquatic habitat and fisheries will occur, with or without the I-405 Corridor Program. The decision to prepare the Draft EIS as if actions under the No Action Alternative had already occurred was made up-front through the Alternative Analyses Process working paper (August 1999), and communicated at the September 1999 meeting of the Steering Committee of which EPA is a member. Technically, the I-405 Corridor Program would not be directly contributing to the associated impacts of the No Action Alternative; it would contribute cumulatively however. Please refer to the cumulative impacts discussion in Section 3.23.

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L41	FATE	2	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.8-9: Do the percentages in Table 3.8-3 for Alternatives 1-4 reflect changes from the present baseline or the baseline that includes the No-Action projects? The area of impervious surface is far greater for Alternative 2 than Alternative 3, while Alternative 3 proposes to add much more impervious area in general purpose lanes than Alternative 2. What accounts for this somewhat counter-intuitive result? If you believe the difference is related improvements (project features associated with an HCT line), what assumptions did you use to arrive at your results? If the Burlington-Northern Santa Fe line already exists and may be used for part of the alignment, did you place the coverage from the line into the existing conditions of impervious surface area? We understand that there are a number of different results possible for both the disposition of the proposed rail line and the size and footprint area of other HCT-related features. We request that you display the following scenarios: 1) existing track will be used; 2) all existing track is used and a second, upgraded line is also built; 3) all existing track is demolished and a second upgraded line is also built, to see how sensitive the results are to changes in footprint estimates. We recommend you include this in the EIS, and disclose your work for public review.	Table 3.8-3 reflects changes from existing conditions baseline that includes the No Action Alternative projects. The new impervious surface for Alternatives 2 and 3 is 820 and 773 acres, respectively. The major differences between the alternatives are that Alternative 2 includes HCT on an independent alignment, and Alternative 3 has two additional freeway lanes. The net difference is approximately 70 acres for these two elements. Alternative 3 has additional arterial projects, which along with other projects reduces the difference. Intuitively one might think that the impervious area for the HCT would be closer to the area for the two roadway lanes, especially since the impervious area for the ballasted trackbed was calculated at 50 percent. The two roadway lanes add 24 feet of additional impervious width for the 30+ miles. The minimum width of the HCT is 38 feet, which, in addition to the 30+ miles, also runs from Factoria to Issaquah for 6+ miles and from Bellevue to Redmond for 7+ miles. Also included in the HCT impervious surface area is 28+ acres for the rail maintenance and storage facility. All other track and station platform facilities were calculated at 100 percent of their proposed surface area. Credit was not given for the existing BNSF right-of-way assuming a reasonable worst case scenario. This strategy was also used for freeway expansion analysis. Alternative 3 proposes a two-lane expansion, but in reality the entire roadway will not be expanded in order to balance lanes.
L41	FATE	3	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	The number of riparian encroachments for transit is far greater for alternative 2 than for any of the other alternatives, including alternative 4. The difference between alternative 2 and the others is an even more surprising result than the aggregate impervious surface area discussed above because it reflects encroachments that may be occurring at specific, discrete locations and can presumably be used as an surrogate for habitat fragmentation. We request that show your assumptions and your work on this calculation as well.	Riparian encroachments include any project impact within 300 feet of streams. This includes both stream crossings and locations where roads or other improvements parallel a stream without crossing. Riparian encroachments were tallied by map overlay using the Arc-Info geographic information system. The analysis was done separately for each basin in order to obtain more detailed information. Each encroachment location is 'tallied" equally regardless of extent in order to facilitate graphic analysis. (The other indicator, new impervious surface, accounts for the aerial

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					extent of impact. A discussion of surface water impacts can be found in Section 3.8 and in the Draft Surface Water Resources Technical Expertise Report). Alternatives 2, 3, and 4 all contain a variety of arterial and freeway capacity projects. Alternative 2 also includes dedicated high-capacity transit lines which will require a second rail line throughout the corridor in addition to the existing BNSF rail line. The bus rapid transit system in Alternative 3 utilizes lanes created under the I-405 capacity improvements included in Alternative 3. Alternative 4 has additional I-405 and SR 167 capacity improvements and additional arterial capacity expansions, which do not result in many additional encroachments.
L41	FATE	4	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	As stated elsewhere, you need to make the document more clear when you conclude the impact to aquatic resources is of overall significance, and how impacts are relative to other alternatives and why. This is one of the crucial results of the Chapter 3 analysis. The document should also state more consistently what the thresholds of significance you have selected are (whether it is a quantified or measurable impact, violation of a regulation or standard, or best professional judgement), and what your justification is for selecting them.	Impervious surface and riparian encroachments are the two measures used to represent potential impacts to fish habitat and populations in the EIS. The assessment of impacts is limited by the programmatic nature of the alternatives. As described in the Draft Fish and Aquatic Habitat Expertise Report, hydrologic alteration caused by increases in impervious surface is one of the parameters that can be used to assess potential negative effects of land development on fish habitat. Riparian encroachments are another measure that can represent potential direct and indirect fish habitat impacts. These measures were also chosen because they lend themselves to quantitative estimation on a large, programmatic scale for projects that are only in the conceptual stage of design. Assessing other parameters such as channel erosion, sedimentation of spawning and benthic habitat, stream flow fluctuation, and increased pollutant load at the programmatic scale is difficult and is best determined at the project phase, as many of these conditions can change. The same impervious surface estimations were used in both the Fish and Aquatic Habitat section and the Surface Water section of the EIS. The connection between total impervious surface and various fish habitat parameters is described in the Draft Fish and Aquatic Habitat Expertise Report. More specific assessment may be overly speculative at the programmatic level, and will be performed in detail for each project as it undergoes project-level regulatory scrutiny. Rather than establishing specific thresholds of significance as for a project-level EIS, the analysis serves to allow relative comparisons among the programmatic alternatives.

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L41	FATE	5	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.8-12, last complete paragraph; Page 3.23-58: bottom paragraph, cumulative impact surface water analysis: It is not clear how the results were generated. The numbers are somewhat confusing. It would be much clearer to show them in tabular format, including the multipliers. What is the total acreage for the study area, and what is the present percentage of impervious surface?	A new table, Table 3.23-18, with the requested information has been added to the I-405 Corridor Program Final EIS. Please refer to the response to comment L41.CU-17.
L41	FATE	6	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.8-12, last complete paragraph: The decision as to whether to attempt to focus mitigation efforts in highly urbanized basins is a complicated issue. It is true that ultimately efforts in such areas may be less effective, but this does not always mean that efforts should be shifted to less urbanized watersheds or sub-basins. Aquatic resources in highly impacted watersheds, owing to increasing scarcity in the basin or area could be assigned comparatively higher value than an equal acreage of similar resources in a less impacted watershed, although scientifically measurable functions might remain equal or be of more benefit in the latter location. Agencies with jurisdiction, including local governments, and the public may place more quality-of-life value or desirability on restoration efforts in highly populated areas, in ways impossible to measure by functional analysis. EPA is willing to continue to work cooperatively with proponents, resource agencies jurisdictions, and the public to assist in developing the best solution for the resources, watersheds and affected citizens.	Decisions about how and potentially where to mitigate for habitat impacts will be evaluated by the co-lead agencies. Agencies, including King County and the WRIA 8 Steering Committee, have commented favorably on mitigating for impacts in off-site, less disturbed habitat. Admittedly there are pros and cons for mitigation in the urban environment. WSDOT is preparing a plan to address the overall program mitigation needs. Typical on-site mitigation efforts will be undertaken, where feasible and reasonable, and are mentioned in the EIS. On-site/in-kind mitigation will be required of the numerous individual projects during the project permitting. Off-site mitigation within urban environments also will occur as a possible mitigation opportunity. Please refer to the response to comment L38.FATE-1.
L41	FATE	7	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Pages 3.8-15-21: EPA is pleased to see that the document presents a thorough and site-specific discussion of mitigation opportunities at the sub-basin level throughout the project area. We would strongly encourage you to commit to developing a potential list of stormwater retrofitting opportunities as part of the mitigation package for the I405 corridor program.	The Draft Proposed Early-Action Environmental Impact Mitigation Decision-Making Process includes stormwater retrofitting programs for the I-405 Corridor Program.
L41	FL	1	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Table 3.10-2: Our comments regarding baseline conditions from Page 3.8-8 above also apply here. For example, to derive the impacts of alternative 1, 17,700 linear feet from the alternative itself would be added to 13,950 linear feet from the no-action alternative to total a change in floodplain encroachment of 31,650 linear feet from existing conditions as of the publication of the Draft EIS (August 2001).	Please refer to the response to comment L41.FATE-1.

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L41	FL	2	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Pages 3.10-7 through 3.10-9: You state that for each alternative, roadways can be designed to avoid the floodway. The discussion is ambiguous about what impacts are forecast to occur. The section needs to describe with clarity whether, how much, and where floodplain storage impacts will occur. If impacts can be avoided, explain how they will be avoided using the existing information in the mitigation section about standard construction and design methods that would work at each site, based on site conditions and the nature of the impact, if known. If information on impacts remains unclear clearly state what is unknown. If you do not know whether impacts can be avoided, then the impacts section can state a range of impacts in linear feet.	Table 3.10-2 summarizes the impacts to floodplains in the study area. This summary generally identifies impacts at the programmatic level.
L41	FL	3	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3-10.9, Mitigation: Some of the measures you describe may involve additional aquatic resource impacts to wetlands, riparian buffers, or in-stream habitat. Have these impacts, if known, already been added to these other sections? Again, if they haven't, simply state that they haven't. If it is possible to estimate areas of impacts at this time, you should do so.	We have addressed impacts to wetlands and streams/fisheries in Sections 3.5, 3.6, and 3.8. Impacts resulting from mitigation activities will be addressed during mitigation project review and permitting.
L41	TR	31	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Statistical data are amply displayed in this Section, but two important items are lacking that make the discussion of the data difficult to analyze. First, there is not enough accompanying discussion in the text for reviewers to compare how effectively the alternatives address each criterion considered.	The Draft Transportation Expertise Report, revised August 2001, provides detailed information and discussion about each alternative and criterion.
L41	TR	2	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Second, there is no indication whether one criterion may be more important than another as an indicator of achieving the project purpose and need.	The project advisory committees did not assign weights to any of the criteria.
L41	TR	3	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	And finally, as in other sections of Chapter 3, an assessment is rarely made of whether impacts are significant, leaving the reviewers to guess too often at what the conclusions are.	The approach has been to provide the information and to avoid value judgments such as the degree of significance of any particular piece of data. The decision on the significance of the data is left to the Draft EIS reader and the program decision makers.

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L41	TR	4	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	The Transportation Section does not adequately consider induced travel. According to the Nationwide Personal Transportation Survey (Federal Highway Administration 1990), only some of the sharp increase the nation has seen in Vehicle Miles Traveled in the last 30 years (36%) can be attributed to demographics (rising incomes, falling fuel prices, more women in the work force). The rest is attributed to changes in land use patterns (mostly places of work located further from homes) that have led to increases in average trip distances and number of trips. As the EIS first discusses at page 3.12-4, the addition of highway capacity often causes an increase in traffic known as induced travel. Short term changes can be caused by people switching from transit or caprioling to driving alone. Long term changes, particularly if travel costs drop, as they did through the 1990s for example, include more dispersed land use that increases trip length and vehicle dependency. Studies in the 1990s by Mark Hansen (Hansen and Huang: "Road Supply and Traffic in California Urban Areas", Transportation Research-A 31:3 {1997}, pp. 205-218), Goodwin and others showed that induced traffic can occur and absorb all new capacity. New road capacity also refers new traffic to connecting arterial and older roads and highways, producing travel change over wide areas. Capacity additions can induce new trips, longer trips, and diversions from transit. These studies have caused many to question whether congestion can be relieved through added lane capacity.	Please see the response to comment E66.SOL-1 related to induced travel. The Final EIS includes a more detailed discussion of the effects of induced travel, which has been considered heavily in the travel forecasts produced for the I-405 study. The oft-cited Hansen research concluded that the primary determinant of induced travel (i.e., increases in VMT) is population change (40 percent of effect), while the effects of added lane miles (i.e., capacity) account for less than 10 percent of the induced travel effect (Hansen, Figure 3, p. 216). Hansen's findings pertained to state highways, and did not include the effects on other arterials or local streets. Please see the response to comment E66.SOL-1 related to induced travel. The I-405 Corridor Program has captured the major elements of induced travel within the forecasting efforts.
L41	TR	5	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Sources of induced travel factors are listed, related to increased residential and non-residential development, car trips, distances and routes (Page 3.12-5; Table 3.12-2). The literature cited above appears to conclude that dispersed (new) land use and increased driving are a result, rather than a cause of induced travel. The transportation analysis should clarify what you have concluded about induced travel. At present, the analysis of induced travel impacts in the subsequent text is given very little attention. The analysis should discuss in more detail how each alternative generates or does not generate induced travel and how significant a part of traffic use forecasts it is. The fundamental questions that should be answered are: will the I-405 generate a substantial level of induced travel, what are those travel effects, and what are the ways of reducing or eliminating this effect?	Please see the response to comment E66.SOL-1 related to induced travel.

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L41	TR	6	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	There must also be some assessment as to whether the predicted impacts are significant.	Please see response to comment L41.TR-3.
L41	TR	7	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Section 3.12.4 should include a discussion of average commute times as well as estimates of average travel times from point to point. Average commute times describe how much time people are actually spending in their cars from actual trip data. Average travel times expressed in the Draft EIS do not, and may not give a complete picture of trips people are actually taking. Puget Sound Trends (monthly newsletter, February 1999) indicates that commute times have been relatively stable. For example, mean auto commute times have remained around 25 minutes throughout the 1990s although average point to point travel times on the I-405 have become progressively slower (See Puget Sound Trends, February 1999 for more information).	The point-to-point travel times were used to show typical trips made within the study area. The study did not calculate average commute times, although we would likely find that the mean times remain about the same.
L41	TR	8	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	In the unresolved issues Section you note that TDM program effectiveness estimates were not fully integrated into travel forecasts. You should also describe the results of your efforts to date to integrate TDM estimates into I-405 corridor travel forecasting. In Figures 3.12-12 and Table 3.12-3 there is some data shown that predicts TDM performance by alternative. You should build on this data by describing the results of the research you are conducting to compare I-405 corridor survey results with results around the country.	The TDM effectiveness estimates are based on national literature, research, and listserve searches conducted on the effectiveness of individual TDM strategies four times over the last six years. We were unable to find examples of TDM programs that have been implemented of the magnitude of the proposed I-405 TDM program. The results documented in the Draft EIS and the Transportation Expertise Report indicate the magnitude of the effectiveness estimates that were made using available data.
L41	TR	9	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	In the EIS text, there is little explanation for these numbers, and little conceptual discussion of how TDM would be implemented, how it can help, and if there are limitations, what they are and why they have not been overcome. Some of this information is touched on in the Transportation Expertise report, but the concept and what it means to the I-405 corridor program should be brought forward in this Section of the main document.	The I-405 Corridor Program committees have discussed how accountability and oversight would be handled. The TDM Program would be implemented via interlocal agreement between the service providers and local jurisdictions. For the most part, existing TDM programs within the corridor would be expanded, with new programs being created in the cases where none exist. New oversight committees would be established. Issues that have not been addressed previously and which appear to have regional significance would be addressed within the PSRC (Metropolitan Planning Organization) structure, specifically the new TDM Roundtable. As appropriate, issues and recommendations may be elevated to PSRC's Transportation and Growth Management Policy Boards and to the Executive Board for policy direction. Estimates of the impacts of the TDM program are contained within the EIS.

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L41	TR	10	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Under TDM Section of Appendix A of the Transportation Expertise report, you site Proximate Commuting as a potential Employer Based Program that could be used. EPA believes that TDM measures focusing on employer-based measures should be given emphasis in the I-405 program. Proximate commuting has considerable potential along the I-405 corridor. It has the potential, if properly applied to immediately reduce the number of cars on the road and the amount of miles they are driven, while imposing little or no cost to employers and providing immediate financial benefits to employees who are able to take advantage of it. Proximate commuting significantly reduces unnecessary long-distance commuting, reducing traffic volumes through voluntary transfers, exchanges and new-hire placements to shorter-commute work sites with similar job positions available at multi-site employers. There is significant potential for proximate commuting to reduce commute distances in the Puget Sound area, where 48 percent of commuters travel to multi-site employers. It reduces emissions and traffic congestion, while employers and employees benefit from shorter commutes, more productivity, lower turnover, and lower commuting costs. Proximate commuting can discourage urban sprawl. It has been field-tested and shown effected in a Seattle demonstration project (WSDOT Technical Report WA 95-400.1, November 1995). The study tested the hypothesis that a substantial amount of long distance commuting is unnecessary and can be significantly reduced at multi-site employer locations (i.e., banks, retail chains, government agencies, etc.) through more deliberate efforts to match new and existing employees to work sites closer to their homes. This field test resulted in estimated annual commute savings for each participant of 6,566 miles and 216 hours, and eliminated 387 pounds of auto emissions per vehicle. Participants' average commute distance decreased by 65 percent.	The initial TDM program is built mostly around proven strategies. We agree that proximate commuting appears to have significant potential, but it needs further demonstration. A pilot program starting at Boeing in early 2002 should provide valuable new data. There are funds included in the TDM program for demonstrations of promising new strategies. Also, there is flexibility to allow reprogramming of funds as strategies evolve. The lead person in developing the I-405 TDM program was also the contract manager for the 1995 proximate commuting demonstration. That was a very limited test. Proximate commuting's ultimate effectiveness remains unknown. The upcoming large-scale test at Boeing will provide valuable information. Funds are included within the I-405 TDM program for further demonstrations, if needed. Funds could be shifted to proximate commuting in the future if the TDM program Steering Committee so chooses.

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L41	TR	11	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	When compares to other TDM measures that may take longer to implement, proximate commuting's benefit on a cost per mile basis is substantially greater. Furthermore, it directly implements the critical regional goal of locating employment closer to where people live. Proximate commuting is a strategy that has received comparatively little attention compared to other TDM measures, such as vanpooling, and EPA Region 10 believes that it may hold considerable untapped potential. The I-405 project management team should strongly market the concept to local jurisdictions and employees in the area. The Office of Ecosystems and Community, EPA, Region 10 is willing to work with the area agencies to analyze the perceived barriers and to assist in locating funding, including EPA grant funds if available, to support a plan to implement a proximate commuting program for employers and their employees along the I-405 corridor. Region 10 would also be willing to investigate the applicability of grant funding to other TDM programs as appropriate.	The TDM program was primarily built upon proven strategies, such as employer-based TDM and vanpooling, although the program includes funds for demonstrations. In addition, for new strategies proven to be effective, the TDM program's Steering Committee could opt to shift some funds to them. Proximate commuting has only been tested to a quite limited degree, although the pilot project now underway at Boeing may change that. The WSDOT would be glad to work with EPA to seek funding for the TDM program, including proximate commuting.
L41	TR	12	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-4: You should explain the relationship, if any, between unconstrained demand and induced travel. Clearly, unconstrained demand is a somewhat hypothetical question, but it appears that one could conclude the more unconstrained demand is, the more the corridor would produce induced travel. Does unconstrained demand in the model then wind up showing results that might unrealistically reflect induced travel, or travel behavior in general? Would unconstrained demand underestimate traffic on adjacent arterial? Is your reason for using the concept of unconstrained demand to more accurately capture induced travel? We request you provide clarification of this relationship, answers to the above questions, and implications for induced travel in the EIS.	The only reason that we included the unconstrained demand, which was done as a hypothetical analysis, was as a point of reference -- we deliberately did not use it as an evaluation criterion. It was not intended to reflect induced travel . (Please refer to response to E66.SOL-1 for a discussion of induced travel). However, the unconstrained demand analysis reflects certain aspects of induced travel, such as diverted trips. The unconstrained demand shows the routes that travelers would take if there were no congestion. This causes substantial diversion onto the primary arterials and freeways, while volumes on minor streets go down. The unconstrained analysis does not reflect changes in tripmaking patterns (another aspect of induced travel) since we did not rerun the trip distribution module when conducting this hypothetical analysis.
L41	TR	13	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-12: The gray tones to indicate TDM, HOV 3+, Non-HOV, and Commercial are not clear on Figures 3.12-1A, B, and C. This should be corrected in the document.	We have changed the patterns/shading in the Final EIS as needed to clarify the information.

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L41	TR	14	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-22: Under mobility impacts, the statement that peak vehicle demand is virtually unchanged from no action, or that travel patterns are very similar to no action could use a few qualifiers (like this does or does not meet the mobility need as we defined it, for example).	The Expertise Report on pg. 4-29 clarifies that the similarity to conditions in the No Action Alternative is due to the very limited capacity improvements included in Alternative 1 and the very small shift in traffic volumes projected by added transit services and facilities. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.
L41	TR	15	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-23, Transit paragraph: The EIS states that "transit travel reductions for the seven trips are in the range of 3 to 30 minutes for walk and ride access… "Do you think these reductions are significant or worth the cost? On Page 3.13-24, Modal Shares paragraph; we make the same comment: Are increases in transit usage at screenlines a significant beneficial impact? How do they compare with the savings from these same measures on other alternatives?	Most urban travelers would consider a 30-minute reduction in trip travel time significant. The actual travel time saving range should be stated as 7 to 30 minutes. Whether these reductions in travel times are worth the cost is a decision made by the appropriate decision-makers. Decision-makers would also need to draw their own conclusions as to the benefit of increases in transit use at screenlines for Alternative 1 and for the other alternatives. See Tables 3.12-6 and 3.12-7 in the FEIS.
L41	TR	16	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-24, Available Capacity in 2020: What is meant by the sentence, "Such capacity would need to be matched with future transit demand in the corridor."?	The per-train capacity of fixed-guideway trains can be increased by adding cars to the trains. Adding more cars than are needed to meet the demand provides no benefit, however.
L41	TR	17	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-23, Potential for adaptability; Explain how the applications of ITS could continue to maximize the efficiency of the current system under Alternative 1. How much difference would this make? Could it offset some of the alternative's deficiencies?	Alternative 1 included assumptions of continued ITS applications in the corridor. The travel forecasting, for example, assumes that there is no delay due to nonrecurring congestion (e.g., incidents). ITS applications can be used to minimize these delays. Intensive applications of ITS would be essential under Alternative 1, which includes minimal improvements in roadway capacity. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.

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L41	TR	18	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-25, HCT Service Plan Sensitivity Test: Why did you assume that HCT vehicles would run directly from an origin station directly to a destination station without any intermediate stops? This, it would seem, would not occur unless one is traveling the distance of one stop on the HCT system. Wouldn't this assumption yield an unrealistic ridership result?	The service plan for the sensitivity test assumed that the HCT vehicles would by-pass stations at which their passengers didn't want to stop. Such skip-stop service occurs in many systems. This sensitivity test went to the extreme of assuming all intermediate stops would be skipped for a particular trip. This is very hypothetical but was intended to illustrate the effects on transit ridership if such a service could be provided.
L41	TR	19	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-24, Table 3.12-12, TDM program effectiveness: This table should compare the effectiveness of TDM program by alternative. It is difficult from the text in each section to fully understand what the potential of TDM within each alternative is, how important a feature of the alternative it is, and how TDM performs in each alternative compared to the others. In reference to footnote "a", couldn't measuring travel in terms of average commuter trip distance be an important measure of TDM program effectiveness? In reference to footnote "b", your estimates in this table show how effective congestion pricing can be. This is a strong argument for including it in all alternatives.	Estimating the effectiveness of most TDM strategies is not something that can be directly derived from the regional model. The estimate was based on local and national experiences with TDM. This effectiveness information was gathered by WSDOT and the University of Washington and has been updated twice to ensure it is the best information available. Average commuter trip distance may be slightly affected by TDM measures, but has not been researched nationally and was not measured directly in the I-405 study. The maximum level of VMT reduction possible from TDM in the corridor was developed first, before the impacts of other components of the alternatives were estimated. Congestion pricing is not something the program committees decided to pursue in the context of only being applicable in the I-405 corridor. Instead they have deferred the subject to regional discussions at PSRC.
L41	TR	20	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-25, bottom: How was the 2020 daily ridership figure generated for transit trips between Tukwila and Kirkland (1,800 to 1,900)?	Each alternative includes a transit component (assumed transit coverage, routes, and levels of service). The 2020 daily transit ridership figures between any two origins and destinations in the study area or region are a function of the total person-trips between each O-D pair and the relative travel time and cost of using transit compared to alternative modes (e.g., driving alone or carpooling). Thus, the forecast of transit trips between Tukwila and Kirkland reflects the number of total daily trips between these two locations and how competitive transit is relative to other options in 2020.
L41	TR	21	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-27 Congestion Impacts: What are the effects with TDM strategies added? Why aren't they added here, and for other alternatives as well since they will be a part of all alternatives? A critical factor in evaluating TDM is how well it relieves congestion.	The TDM analysis was conducted outside of the regular travel modeling process, because the travel model is relatively insensitive to certain key TDM factors. We attempted to build the empirical TDM effects back into the model but were unable to obtain reasonable congestion effects. The congestion results as shown in the Draft EIS (i.e., without the TDM effects) can be considered worst case. Please also refer to responses to comments L41.TR-10, L41.TR-11, and L52.TR-5.

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L41	TR	22	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-29: Explain why Alternative 2 would have minimal road capacity after 2020 while under Alternative 1, the transit system would continue to have substantial capacity? What accounts, in your view, for the difference?	Alternative 2 provides limited additional road capacity, which would be largely used up by 2020. Conversely, the HCT element would have substantial additional capacity for expansion of transit services, should there be sufficient demand.
L41	TR	23	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-31, Table 3.12-9: Can some of the broadening difference between VMT and Vehicle Hours of Travel (VHT) as one moves between Alternatives 1 and 4 be attributed to induced travel? If so this should be explained and discussed.	The modeling process does capture the impact of increased capacity on the attractiveness of using the I-405 corridor relative to other corridors where no additional capacity is proposed. This is sometimes referred to as 'induced" demand. Please refer to response to E66.SOL-1 for further information.
L41	TR	24	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-32 (Also pages 3-22, 3-28, 3-36): Construction impacts for all alternatives are substantial and extend over many years, making them more critical than on many other projects where construction may last for only one season, and disruption impacts (such as traffic or access) are usually considered to be worth the trouble, no matter how difficult to manage. It is particularly trouble that on Alternatives 2, 3 and 4, impacts are spread over as much as 15 years on a program that by some of your own measures, may reach capacity shortly after construction is complete. For this reason, construction impacts are much more significant than they might otherwise be. What might the impacts be on travel times? The EIS must focus on how the mitigation measures listed on page 3.12-40 and 3.12-41 can be managed effectively as a coordinated program to reduce construction related impacts, and how the lead agencies will commit to implementing these measures.	We have provided a more in-depth analysis of construction impacts for the Preferred Alternative in Section 3.12.4.6 of the FEIS.
L41	TR	25	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3-12.33, Page 3-12.37: Sections on Traffic Volume Shifts Between Facilities: These discussions do not compare impacts across alternatives, nor in statistical terms, explain the consequences. Are these impacts significant? Do they affect the long-term viability of any of the alternatives?	Each alternative includes a discussion of traffic shifts where applicable. These results are taken from the travel model. There is no way to provide a statistical basis for the findings, which are intended to be illustrative of the potential shifts. The alternatives with more road capacity provide the greatest traffic shifts. The effects of these shifts are included in the person demand and congestion calculations.
L41	TR	26	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-34, Available Capacity in 2020: Both Alternatives 2 and 3 would run out of lane capacity, but the latter would run out of it ten years later. How significant is this difference? If Alternative 3 only buys ten years of time, is it worth the extra cost? Transit systems in both alternatives could serve additional persons after 2020. Could they also serve more persons beyond 2030?	Alternative 3 would provide longer sustainability of lane capacity than Alternative 2. The transit systems under either alternative would likely have additional capacity after 2030.

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L41	TR	27	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-37, Daily Traffic Volume Shifts between Facilities: The text states that, "Substantial improvement in mobility provided by Alternative 4 could result in an increase in the number of discretionary trips made within the corridor." (This is stated on page 3.12-33 for Alternative 3 as well). Can these discretionary trips be termed induced travel? Also, you should explain the following sentence on both pages: why are these effects are minimal compared to high growth in the overall study area?	The additional trips attracted to the corridor under various alternatives could include additional work trips, shopping and recreational trips, and personal business trips. If the corridor is heavily congested, commuters may continue to use the corridor if that is their only alternative, but travelers may avoid the corridor for those trips for which other options are available. These are the "discretionary" trips that are referred to in the Draft EIS. The largest increases in travel in the corridor are between the base year (1995) and 2020, since the region and study area are forecast to grow significantly during that period. The 25-year growth in travel in the region and in the study area due to growth in population and employment is significantly greater than would be growth in travel that can be attributed to "induced" demand. Please refer to response to E66.SOL-1.
L41	TR	28	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.12-38, Available Capacity in 2020: Why would transit provide only minimal excess capacity after 2020? On Alternative 3, (Page 3.12-34), BRT "can easily respond to increased demand by adding more busses". Can we conclude that the BRT transit component in Alternative 3 is superior to the transit component of Alternative 4? Does this mean that BRT is superior, or is there something about the differences in the predicted traffic flow through Alternatives 3 and 4 after 2020 that cause the discrepancy?	Additional transit capacity could be provided beyond 2020 with Alternative 4, given the same provisos as stated for Alternative 3, "that additional bus equipment and operating revenues are available; park-and-ride and transit center capacity are sufficient; and speed and reliability performance criteria are met running in a predominantly HOV lane ROW environment. Long-term demand may require transit center expansion and reserved bus lanes and curb space in Urban Centers." However, added capacity on roads could reduce transit attractiveness for some time.
L41	SOC	1	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.15-9: There is no clear overall explanation of how this section arrived at social impacts on cohesion or social interactions, nor are these terms well defined in the EIS. It is not clear what criteria you used to perform the effect determinations, except that you state that high traffic increases on arterial might have a greater effect than those on the interstate corridor, and that displacements and land use changes, noise or visual impacts could separate neighborhoods or impair community character. Nor is it clear how you arrived at division points between Low, Moderate and Substantial Effects. if the effect determinations had specific quantitative cutoffs for increases in traffic and where it occurred they should be stated. If effect determinations were based on best professional judgement, this should also be clarified. We recommend a decision matrix showing how you set up and performed effect determinations.	Please see Section 2.2 and Table 3-1 in the Social Expertise Report for a description of the social impact methodology and the results of the scoring matrix. Social effect determinations were based on best professional judgment, with the results from the noise, air, traffic, visual quality, displacement, and land use studies as supporting data.

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L41	CU	1	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Programmatic EISs provide a critical opportunity to conduct a cumulative effects analysis because resources are examined at a broad geographic and temporal scales. This programmatic EIS, as we have stated elsewhere in our comments, is intended to be used over time as a reference document as individual projects in the I-405 corridor are designed, built, mitigated and monitored. One of the purposes of developing a programmatic document is to manage affected resources in sustainable fashion over the affective life of the document (possibly the next 15 to 20 years in this case), and to attempt to restore resources that have degraded to beyond some acceptable threshold. Direct impacts receive less consideration because they are more difficult to assess given the present lack of available detail. This EIS should be emphasizing the analysis of cumulative impacts of the programmatic proposal over the analysis of direct and indirect impacts. Cumulative impact concerns will also be an important consideration at the project specific level. A thorough cumulative effects analysis done in this document would preclude having to repeat the analysis for each project that tiers off this EIS. The programmatic document should serve future reviewers of site-specific NEPA documents by giving them the information to determine whether resources are being used in sustainable fashion within the context of a broader plan.	As you observe, the I-405 Corridor Program Draft EIS has devoted particular emphasis to the analysis of cumulative effects, incorporating a broad geographic and temporal scope. This will enable the program-level EIS to be referenced over time and incorporated into the follow-on project-level NEPA and SEPA environmental analysis, documentation, and review. Also, please see revisions to Section 3.23 of the Final EIS.
L41	CU	2	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	The Council on Environmental Quality (CEQ) NEPA regulations state that EISs shall consider direct, indirect, and cumulative impacts. However, Federal agencies have found that doing an effects analysis for cumulative impacts has been the most challenging of the three impacts to be considered. Consequently, CEQ published in January 1997, "Considering Cumulative Effects Under the National Environmental Policy Act", a guidance that provides a framework for analyzing cumulative effects. EPA has also issued guidance on how we are to provide comments on the assessment of cumulative impacts, "Consideration of Cumulative Impacts in EPA Review of NEPA Documents", which can be found on EPA's Office of Federal Activities home page at es.epa.gov/oeaca/ofa/cumula.html. The guidance states that in order to assess the adequacy of the cumulative impacts assessment, five key areas should be considered. EPA tries to assess whether the cumulative effects analysis:	The evaluation of cumulative and indirect effects described in Section 3.23 of the Final EIS relied on both the January 1997 CEQ publication, "Considering Cumulative Effects Under the National Environmental Policy Act", and the May 1999 EPA guidance, "Consideration of Cumulative Impacts in the EPA Review of NEPA Documents." These citations have been added to Section 3.23. Also, please see response to comment L41.CU-1.

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				1. Identifies resources that are being cumulatively impacted (if there are none, then it should state this); 2. Determines the appropriate geographic (within natural ecological boundaries) area and the time period over which the effects have occurred and will occur; 3. Looks at all past, present, and reasonably foreseeable future actions that have affected, are affecting, or would affect resources of concern; 4. Describes a benchmark or baseline; 5. Includes scientifically defensible threshold levels.	
L41	CU	3	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	It appears that your analysis was based largely on the PSRC land use forecasting model (DRAM/EMPAL) for the parameters of employment, population and households. Some discussion is needed about the reasons you selected this model. It is fairly clear how you used the model to predict these three parameters. It also appears that you extrapolated the results for these three growth factors to the natural resources discussed later in the Chapter. You need to make clearer how you set up the model and produced the data for the various resources analyzed in each Section.	The PSRC model was chosen due to the regional overview that it provides and the fact that it has been the regionally recognized land use/transportation model to date. As the I-405 Corridor Program affects a large geographical area within the Urban Growth Area, it was necessary to have a regional model. The model was also chosen because it incorporates the local comprehensive land use objectives and employment/household densities agreed upon for the designated Urban Centers. It incorporates the projections of the Washington State Office of Financial Management, PSRC's forecasts, and the agreement of the county and city agencies. Specifically, the Regional Council prepares regional forecasts of population and employment and allocates them to FAZs using DRAM/EMPAL. The county totals are not controlled, but are aggregations of the FAZs. The Regional Council's forecasts are consistent with the Office of Financial Management (OFM) forecasts in the sense that they are developed in consultation with OFM and lie between the OFM minimums and maximums.

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L41	CU	4	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Geographical Area and Temporal Boundaries: The cumulative impacts analysis clearly states the appropriate geographic area over which effects might reasonably occur and be estimated. Reviewers are left to wonder why the fairly arbitrary four county area was used. Did you use it because it fit with the PSRC model? The document should provide explanation for setting these limits or explain why you did not choose to set broader or more narrow limits). We understand your logic in drawing a temporal boundary at the year 2030 (Page 3.23-2), because it is consistent with the Destination 2030 Plan (Puget Sound Regional Council 2001). The analysis does a reasonably good job of reaching into the past to describe what major events have led to the present situation for most natural resources, such as surface water and wetlands, and for historical events and logical 'data breaks' in the pattern of growth, the expansion of demand on transportation systems, population, and development.	The four-county planning area of the Puget Sound Regional Council was used as the geographic area of analysis for potential cumulative effects resulting from changes in pressure for growth and development. This area was chosen because it contains the area of potential effect for each of the scoped critical resources, there is good availability of historic data and forecasts of growth and development, and it corresponds to the PSRC land use forecasting model.
L41	CU	5	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	The guidelines on assessing cumulative impacts require federal agencies to consider all reasonably foreseeable future actions. Many of the impacts you attempt to forecast through modeling are speculative, rather than reasonably foreseeable, and this may have affected your results. Describe how you have (or have not) considered this in the EIS. For example, even the No-Action Alternative includes many construction projects that are likely to happen, but not certain to. It would be instructive to see how sensitive the results would be to changes in assumptions. This also would illustrate how reliable your results are likely to be with future adjustments in the No-Action transportation system.	The I-405 corridor improvements for each alternative were added to or overlaid onto the future No Action Alternative. The No Action Alternative includes only those projects that have committed funding. For example, only Phase One of the Sound Transit Sound Move Plan was included in the 2020 No Action Alternative since only this phase has committed funding. The existing configuration on I-90 (reversible center lane for buses/carpools and Mercer Island general purpose traffic) was assumed for the No Action since an EIS is currently being prepared studying various alternatives on I-90. Similarly, no major improvements in the SR 520 corridor were assumed since an alternatives analysis is still underway for that corridor. Official land use forecasts from PSRC have been used for evaluating all of the alternatives. Forecast growth and development is the greatest contributor to cumulative effects in the four-county region. This approach was used because it was believed to represent a reasonable worst-case analysis. If planned growth did not reach the levels that are forecast, cumulative impacts could be substantially less than those presented in the Draft EIS.
L41	CU	6	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Describing a benchmark or baseline; For surface water, wetlands aquatic resources in general and for air, the document has done a good job of establishing a benchmark or baseline.	Thank you for your comment.

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L41	CU	7	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Compare to scientifically defensible threshold levels: In our review, it should be possible to determine whether the analysis included specific resource thresholds required under law or by agency regulations, and whether the cumulative impacts would exceed those thresholds. The EIS should clarify what the conclusions are for each resource, and for each alternative if appropriate.	The discussion of cumulative effects in Chapter 3.23 of the Final EIS has been revised to clarify the conclusions for each resource and alternative, and the basis for those conclusions.
L41	CU	8	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.23-4 – 3.23-5: It is not entirely clear what your modeling assumed about large projects that will link with I405 such as the TransLake project, I90 improvements, Sound Transit, and the regional land use estimates from Vision 2020. As in the assumptions about temporal boundaries, it would be useful to know how sensitive the results are to changes in these assumptions.	The I-405 corridor improvements for each alternative were added to or overlaid onto the future No Action Alternative. The No Action Alternative includes only those projects that have committed funding. For example, only Phase One of the Sound Transit Sound Move Plan was included in the 2020 No Action Alternative since only this phase has committed funding. The existing configuration on I-90 (reversible center lane for buses/carpools and Mercer Island general purpose traffic) was assumed for the No Action since an EIS is currently being prepared studying various alternatives on I-90. Similarly, no major improvements in the SR 520 corridor were assumed since an alternatives analysis is still underway for that corridor. Official land use forecasts from PSRC were used for evaluating all of the alternatives. As a related project, WSDOT is evaluating the system effects if all of the major projects under study were in place. These results can be made available by WSDOT when completed.
L41	CU	9	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.23-14: We recommend bringing some of the transportation concurrency discussion from the Transportation Expertise report and summarizing the impact on concurrency for each alternative in the appropriate part of the cumulative impacts section.	Additional information on concurrency effects is included in Section 3.12.4 and 3.23 of the Final EIS.
L41	CU	10	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.23-31, Table 3.23-5: Figures that show net changes for Kitsap and Pierce County should be negative.	That section has been corrected in the Final EIS.

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L41	CU	11	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.23-22, 2nd paragraph from bottom: Are we sure that urban centers and all future HCT stations likely become focal points for growth in employment and households? Does the data support this, or is it just being assumed?	The counties and cities have adopted comprehensive plan policies and zoning code designations that direct the growth into the centers and transit-oriented developments at the HCT hubs. The statement is based on these adopted plans, and an example of this trend is in the City of Renton's Urban Center with multi-family density development centered on the new transit center. Additionally, the City of Bellevue's Urban Center has an operational transit center and is expanding the supply of transit-supportive housing.
L41	CU	12	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.23-31. Bottom paragraph: Why should the capacity expansions on I-405 shift some traffic onto I-405 from the arterial and provide reduction in study area traffic congestion? Do the results show this, relative to the other alternatives, or is this effect assumed?	If capacity is added to I-405, speeds will improve and travel times will decrease on the freeway relative to parallel arterials where capacity has not been added. Since I-405 will provide a time advantage over using an arterial for many trips, it is logical that travelers will choose to use the freeway until that point in time when available capacity is used up and the relative travel time on the freeway is equal to or longer than using an arterial. This is not an assumption per se but an outcome of the modeling process, which is based on theories about how travelers make choices.
L41	CU	13	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.23-41, Figure 3.23-15: What is the value on the vertical axis? The title would suggest that it is percentage, but it labeled 'in 000's (thousands).	The FEIS has clarified the terminology on the vertical axis in Figure 3.23-15.
L41	CU	14	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Table 3.23-9: Of note here is that the mode share hardly changes across alternatives, and likewise, there appears also to be very little change in average speeds by alternative.	All alternatives are multimodal in nature, that is, all provide both highway and transit capacity in the corridor. We would expect somewhat bigger shifts in mode shares for alternatives that improve transit service only (no highway expansion). Because all alternatives include some highway capacity improvements, the relative travel times for transit compared to driving do not necessarily improve significantly even if transit service levels increase. Thus mode shares do not vary drastically from alternative to alternative as you point out. Although we did not conduct a detailed mode share analysis for 2030 or beyond, it is reasonable to expect that the relative mode shares for transit would improve as the roadway system becomes more congested. This assumes that transit maintains some travel time priority compared with general traffic.

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L41	CU	15	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.23-50, Table 3.23-11: How were these numbers generated? Were assumptions from Destination 2030 used? And perhaps most important, how large a contributor to regional emissions would those generated on I-405 represent? This information is necessary to assess cumulative impacts on air, which obviously is a resource where effects may not be contained within the I-405 corridor area of study.	The values in sections 3.1 and 3.23 of the Draft EIS were calculated using PSRC's regional modeling procedures consistent with *VISION 2020*. At the time of the analysis, *Destination 2030* had not been adopted. Since completion of the Draft EIS, the Preferred Alternative has been incorporated into *Destination 2030* and found to conform to the Puget Sound air quality maintenance plans at the regional level. Interstate 405 substantially affects regional emissions, and consideration of emissions from I-405 alone fails to reflect the interstate's regional importance in travel patterns. The I-405 Corridor Program's effects on regional emissions are quantified in Section 3.1 of the Draft EIS.
L41	CU	16	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.23-53, Table 3.23-12: Likewise, how large a contributor to regional energy consumption does consumption on I-405 represent? As with air, energy is a regional resource not easily analyzed within artificial boundaries like the I-405 corridor area of study.	Energy consumption values presented in Section 3.3 are inclusive of the entire I-405 study area. They do not represent energy consumption from I-405 alone. Because of regional shifts in traffic, the comparison of energy consumption on I-405 alone under the action alternatives relative to the No Action Alternative would not be meaningful.
L41	CU	17	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Pages 3.23-58: bottom paragraph, Page 3.23-59, Surface Water analysis: It is not clear how the results were generated. It would be much clearer if the data discussed in this entire section were also shown in tabular format. Some important and relevant figures are missing or not easily accessible and this makes it difficult for the reader to follow the analysis. It would be useful for you to list the total project area acreage, for example. What is the percentage of this area that is presently in impervious surface? What is the difference between impacts for no-action alternative and the impacts for each alternative? Please reorganize this information in the document.	A new table (Table 3.23-18) has been added, showing all of the calculations done for the impervious area cumulative effects presentation. With regard to the impervious area impacts of the alternatives, the fourth paragraph in the subsection Cumulative Effects of I-405 Corridor Program Alternatives (part of Section 3.23.4.3) states that this varies from 1 percent of the study area's new impervious area over the next 20 years, for the No Action Alternative, to 8 percent for Alternative 4.
L41	CU	18	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 3.23-59: For the discussion of impacts of Alternatives 3 and 4, when you refer to specific areas experiencing increased pressure, what data are you basing your conclusions on?	This discussion is based upon household and population distribution maps developed for the I-405 Corridor Program Draft Land Use Expertise Report. Some of them are reproduced in Section 3.23.3.4 of the Cumulative Effects section of the I-405 Corridor Program Draft EIS.

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L41	CU	19	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Presumably, the results should be similar to those for the economic data analyzed earlier in this Section. In discussing the effects by alternative, you are using adjectives such as "modest", "slight increase", and "substantially greater cumulative effects" to describe impacts. Specifically what data are you basing these conclusions on – what is immediately above in the text?	The I-405 Corridor Program Land Use Expertise Report prepared maps of the study area showing the changes from the cumulative baseline (the No Action Alternative) and the future increases (or decreases) in employment and number of residences. The model used to generate these numbers was closely linked to the traffic model, whose subareas (termed forecast analysis zones [FAZs]) were different from the stream basin boundaries used in the water resource analysis. An overlay of the two sets of polygons yielded a rough estimate of basins receiving more or less development, as compared with the baseline. This was the basis for the discussion of relative differences in cumulative impacts among the alternatives. It should be remembered that in no case did these I-405 Corridor Program-related differences amount to more than a few percent of the overall cumulative development each basin faces in the future.
L41	WET	8	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page S-13: Corps bullet, this should be worded to read Department of the Army permit required for: a) discharge of dredged or fill material into waters of the United States (Section 404 of Clean Water Act); b) certain work or structures in navigable waterways (Section 10 of Rivers and Harbors Act).	The wording has been revised as suggested.
L41	O	7	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page S-13 EPA: Oversight on Section 404 of the Clean Water Act; Air Conformity, NEPA Review responsibilities per Section 309 of the Clean Air Act, Oversight responsibility on stormwater permits, National Pollution Discharge and Elimination Systems (NPDES) Permits.	Please see the revisions in response to your comments in the Summary section of the Final EIS.
L41	TR	29	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page S-15: What is the status of RAN? Is a report available?	The study is complete. The Regional Arterial Network is a list of regionally significant roadways within King County and is available from King County Department Of Transportation.

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L41	CU	20	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page S-15: The document assumes no secondary impacts because it assumed that growth will occur anyway. While EPA acknowledges that in the recent past rapid growth has occurred, can we be sure that growth would continue to occur at the same rate? Also do we know if I-405 would not induce growth rather than respond to it?	Please refer to response to comments L54.CU-6 regarding secondary impacts. The I-405 Corridor Program used the Puget Sound Regional Council model to forecast future growth in the project area because it is the regionally recognized land use/transportation model. It is true that the forecast growth and changes in pressure for development might not be realized. Nonetheless, the PSRC model is the regionally accepted model for projecting future conditions. The I-405 Corridor Program proposes a transportation infrastructure to serve existing and planned needs. It does not control the location or the pace of land development. The I-405 infrastructure will allow for movement of the regional and local traffic, that will take place within the urban growth boundary.
L41	TR	30	Judith Leckrone Lee 1200 Sixth Avenue Seattle, WA 98101 Agency: EPA Region 10	Page 1-8: The report discusses travel time reliability, as examined by the Washington State Transportation Center (TRAC) but fails to define what this measure consists of. What do very poor and extremely poor reliability mean? Are they given specific definitions elsewhere in the document?	The Draft Transportation Expertise Report, revised August 2001, provides detailed information and discussion about travel time reliability in Section 2.2.2. The terms used are qualitative assessments of actual data.
L42	SOL	1	David A Russell 4507 105th NE Kirkland, WA 98033-7637 Agency: Public	Thank you for your work on the I-405 Corridor Program. The needs are real and the decisions you make will affect the Eastside for generations to come. As a member of the group "sensible Solutions for 405," I am writing to encourage you to support a hybrid approach, rather than the "preliminary preferred alternative" in your final deliberations.	Thank you for your comment.
L42	ALT	1	David A Russell 4507 105th NE Kirkland, WA 98033-7637 Agency: Public	The WSDOT calls the "preferred alternative: a "multi-modal" approach. And it's true, to a point. It includes significant increases in the number of vanpools on the road. It calls for new and expanded Park and Ride facilities. It proposes to preserve an existing rail corridor for future uses. And it recognizes a role for land-use incentives that encourage density, which will reduce demand on the regional transportation system. But it remains essentially a highway widening program, with a full 75 percent of the budget to be spent building new lanes over a period of some 18 years.	It is assumed that you are referring to the preliminary preferred alternative that was recommended by the Executive Committee in January 2001. A preferred alternative was not included in the Draft EIS, but is in the Final EIS. Your comments concerning the preliminary preferred alternative are noted. In addition, the preliminary preferred alternative also included a new bus rapid transit (BRT) system throughout the I-405 corridor study area as well as a physically separated, fixed-guideway high-capacity transit system (HCT) in the central I-405 corridor. Costs for the HCT core system were not included in the preliminary preferred alternative. You are correct that nearly 75 percent of the budget for the preliminary preferred alternative would build new lanes, but these lanes are also essential for movement of transit and freight.

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L42	COST	1	David A Russell 4507 105th NE Kirkland, WA 98033-7637 Agency: Public	We oppose this approach for the following reasons: First, we don't see how the region can afford a widening project whose price tag at this early stage is already estimated at more than $7 billion. Consider than a 10-cent gas tax increase would be required throughout the state for over 20 years to pay for it! The tax burden is simply too great whatever the source, especially given other regional needs that include expensive improvements to ST-520 across Lake Washington and the Alaskan Way viaduct.	See response to comment L40.COST-2. Not all funding will be new. Many of the projects are in local agencies' current capital improvement programs and can be partially or fully funded through existing revenue sources. Sound Transit has some available unspent funds for Eastside transit projects.
L42	TR	1	David A Russell 4507 105th NE Kirkland, WA 98033-7637 Agency: Public	Even if we could pay for it, there is increasing evidence that adding general-purpose lanes is a losing proposition. A study by the University of California shows that added highway capacity is 90 percent consumed by new, or "induced" travel demand with five years of completion. In other words, if you build it, they will come. Perhaps it is not surprising that the state predicts that the preferred plan for I-405 would leave us with five hours of average daily congestion in 2020, only two hours less than if nothing were done at all! California's governor has just declared that state's attempts to meet travel demands by adding more freeway lanes a failure.	Please refer to E66.SOL-1 for a discussion of the effects of induced demand. The co-lead agencies are not aware of the comments made by the Governor of California.
L42	O	1	David A Russell 4507 105th NE Kirkland, WA 98033-7637 Agency: Public	The environmental impacts of the project are staggering. There are a number of high-quality wetlands that would be affected, the project entails over 200 stream crossings and the runoff from over 100 miles of new highway threatens endangered salmon. We applaud the proposed $600 million in environmental upgrades along the corridor, but are concerned about how successful they would be. And we're concerned about the increased noise and air pollution from the higher volume of traffic on clogged highways both during construction and when the project is completed. And we worry about the impact on communities along the corridor as drivers rush through neighborhoods to get to the new freeway capacity.	Please refer to the response to comment E66.SOL-1.
L42	SOL	2	David A Russell 4507 105th NE Kirkland, WA 98033-7637 Agency: Public	We are not for a second suggesting that we do nothing about I-405. Nor are we saying that we should throw out the work that has been done and start over. The plan ultimately chosen is expected to be a hybrid of the various alternatives that have been studied. We would like to see it be the one that costs much less, can be implemented sooner, and places less emphasis on the single occupant vehicle. Sensible Solutions for 405 has developed such a hybrid with the help of expert consultants. It has the following features:	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Also, please refer to the response to comment E66.SOL-1.

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				* A $2 billion investment in roadway improvements, focusing on bottlenecks and adding a lane in each direction on I-405 from I-5 in the south to I-90, and on SR-167. It calls for strategically placed truck climbing lanes throughout the corridor. And it proposes direct-connection "auxiliary lanes" linking SR-522 to SR-527, SR-900 to SE 44th, and SR-167 to SR-169, eliminating the need for vehicles to clog I-405 just to get on the neighboring thoroughfare. These projects would balance capacity with the northern part of the corridor, and address the worst causes of congestion. * A $1 billion investment in transportation alternatives, including pedestrian and bicycle improvements, HOV access ramps, park and ride spaces, and transit. We propose substantial new bus service along 405, and along major arterials, and a new cost-effective transit service along the Burlington Northern Santa Fe railroad right-of-way. * Finally we propose an aggressive effort to manage transportation demand, from expanded programs to reduce work trips, to incentives for communities to locate jobs and housing close to transit centers. We also encourage transportation pricing as a way to connect roadway supply and demand, and to raise revenue to help pay for the improvements. We believe that this hybrid is a responsible mix of transportation expenditures for the I-405 corridor, and hope you will consider it carefully. The future of our region and the livability of our communities depend upon the decisions you make.	
L43	HCA	1	James Loring 1815 153rd Avenue Southeast, Bellevue, WA 98007-6141 Agency: Public	I have great concern about the impacts of the I-405 Corridor Project Alternatives will have to the greater Eastside in general and the City of Bellevue in particular. The Proposed Alternatives, including the No Action Alternative, will have specific and generalized adverse impacts on the quality of life in the Study Area delineated in this DEIS - the individual impacts to specific places unacceptable, the impacts to the area as a whole potentially catastrophic. Two subjects addressed in the DEIS, the fates of sites of historic and archaeological interest, may best illustrate what could be lost should any of the Alternatives reach fruition.	Please refer to the response to comment L32.HCA-2. Regulations require keeping the location of archeological sites confidential. Cultural and historic resources will be investigated in greater detail during future project-level environmental analysis, documentation, and review.

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				Each of the Proposed Alternatives, including the No Action Alternative, will have adverse impacts on historic, cultural, and archaeological sites along the Corridor. The I-405 Corridor Study-Work Element 3: Alternatives Development and Screening Cultural Resources-Archaeological and Historic sites revised technical memorandum indicates that 5 archaeological sites and 13 historic sites will potentially be impacted by the addition of two additional general purpose lanes in each direction on I-405, the widening of SR-167 by one lane, and the associated expansion of arterials.	
				The authors of this report acknowledge that the survey efforts are far from complete and comprehensive, and I have concerns that all sites of potential historical and archaeological interest have not been adequately identified. An inadequate methodology for the identification of these sites is outlined in the Draft EIS, and no attempt has been made to list or clearly identify known existing sites, or potential sites that will be adversely impacted by these project proposals.	In consultation with the Washington State Historic Preservation Officer (WA SHPO), the I-405 Corridor Program developed an appropriate methodology for program-level review that considers impacts to historic and cultural sites. Table S-2, Summary of Potential Impacts and Possible Mitigation Measures, in the I-405 Corridor Program Draft EIS describes potential project impacts to known and/or existing sites or potential sites. Cultural and historical resources will be investigated in greater detail during future project-level environmental analysis, documentation, and review.
				Very little of the I-405 project area has been subject to professional archaeological or historical survey or inventories, and in fact has never been formally investigated for cultural resources. In the Bellevue area, two sites listed on the OAHP Survey are not included or acknowledged in the DEIS. Bellevue lacks a formal survey (i.e., for purposes of planning and land use) of its cultural and historic resources.	
				The City of Bellevue Comprehensive Plan acknowledges the importance of historical and cultural resources in Policies UD-76 and UD-78. UD-76 states that to "Preserve, enhance and interpret Bellevue's historical identity" and in UD-78 to "Designate historic landmark sites and structures and review proposed changes to ensure that these sites and structures will continue to be a part of the community and explore incentives for rehabilitation" are fundamental precepts to the community's development-that these resources are of importance to the city. The city of Bellevue lacks an adequate, complete, and up-to-date survey of its historic, cultural, and archaeological resources. It must be assumed that many of the other municipalities in the Corridor lack clear identification and documentation of their respective historic, archaeological, and cultural resources.	Cultural and historic resources will be investigated in greater detail during future project-level environmental analysis, documentation, and review. We agree that many of the other municipalities in the I-405 corridor lack clear identification and documentation of their respective historic, archaeological, and cultural resources.

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				Further, there is insufficient staffing for the Certified Local Governments (CLGs) working under the auspices of Federal historic preservation programs. The City of Bellevue is not a CLG, and to the best of my knowledge, has refused to address the issue of historic preservation in a public process. Although professional surveys of historic and cultural resources have been funded by the City of Bellevue in the past, there has been no effort to formally and systematically address the identification, preservation, or formal study of sites of potential archaeological interest-including areas inhabited by aboriginal peoples prior to the European settlement-of the I-405 Corridor study area.	
				In the entire I-405 Corridor Study area, the DEIS states that no systematic field surveys were undertaken either to identify the presence of archaeological sites or to field-check tax assessor data on pre-1960 constructed buildings and structures, and unverified GIS data has been used in the DEIS. While systematic field surveys are to be relied on at the project-level analysis, it is of concern that unverified (i.e., the over reliance on GIS data that has not been verified empirically) is being used in this DEIS, has not been provided in the document, and presumably forms the basis for the number of historic properties reported in the CH2M-Hill *Revised Technical Memorandum*.	Use of geographic information systems (GIS) was suggested by WA SHPO. Its limitations have been adequately noted in the I-405 Corridor Program Draft Cultural Resources Expertise Report. Cultural and historic resources will be investigated in greater detail during future project-level environmental analysis, documentation, and review.
				Even at this project level analysis, it is of grave concern that a full listing of **specific sites** of historic and archaeological value, and those having the potential for listing under Section 106, have not been identified in this DEIS. It is obvious that a full listing of all buildings of historic value and sites of archaeological interest, both currently appearing on a recognized list and those with the potential for listing under Section 106, must be provided in the Final Environmental Impact Statement. The Study Area lacks the mechanisms to identify such sites, methodologies to designate significant sites, and ways to insure the responsible preservation of such sites. Should these issues not be adequately addressed in the FEIS, we may forever lose things of cultural and historic significance out of ignorance of their existence, and inadequately provide for their preservation.	The I-405 Corridor Program EIS is not project-level analysis, as you have stated. As described in Section 3.21.2 of the Draft EIS, the approach to consideration of historic and cultural resources is consistent with this programmatic, planning-level environmental document. Cultural and historic resources will be investigated in greater detail during future project-level environmental analysis, documentation, and review.

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				Nothing in the DEIS outlines the steps to be taken to preserve sites of historic and archaeological significance. The Final EIS must address the specific programs, their sources for funding, and the ways in which the public will be allowed opportunities to interact with publicly accessible historic and archaeological sites-what will be implemented to preserve these sites and under what conditions? How will these sites be preserved, and how will their preservation be funded? In a nutshell, the Final EIS must address the following with respect to historic buildings and landscapes impacted by each of the Alternatives 1. Provide clear identification and documentation of all known and potential sites 2. Ensure the adequate preservation of historic structures 3. Provide adequate resources, including sources for funding, for their preservation. 4. In those that must be displaced or destroyed, mitigation to "replace" their loss Similarly, the FEIS must address archaeological sites impacted by each of the Alternatives 1. Clear identification, documentation, and opportunities for qualified archaeologists to fully study and document each site 2. Collection of artifacts for analysis and display, and protection from loss and destruction 3. Ensure the preservation of archaeological sites-some sites, and portions of each site, left undisturbed for future study 4. Procedures to minimize the disturbances to sites and potential sites Finally, there must be Commemoration & Monuments for historic and archaeological sites destroyed or displaced by an eventual Preferred Alternative, including the No Action Alternative. The above addresses just two aspects of what must be included in the Final Environmental Impact Statement; they are by no means exhaustive of the concerns I have for the impacts any capacity expansion, or a No Action Alternative, will have on the Corridor.	Sections 3.21.2 and 3.21.5 of the I-405 Corridor Program Draft EIS provide information about mitigation. Because cultural and historic resources will be investigated in greater detail during future project-level environmental analysis, documentation, and review, greater detail will be provided at that time about programs, funding sources, and public access for preservation of archaeological and historic sites.

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L43	COST	1	James Loring 1815 153rd Avenue Southeast, Bellevue, WA 98007-6141 Agency: Public	The DEIS uses an inadequate methodology for the evaluation of financial impacts, a methodology which will tend to understate the overall costs of the Alternatives, and overstate the benefits.	An analysis of the benefits and costs of alternative approaches to traffic and transportation improvements was completed following procedures outlined in the Surface Transportation Efficiency Analysis Model (STEAM), developed by the Federal Highway Administration. Four alternatives were evaluated to determine their net present value. The alternatives evaluated represented a mix of transportation modes that ranged from a transit emphasis to a roadway emphasis. The benefit/cost ratio was estimated for both low and high travel time scenarios. Alternative 1 had a low benefit/cost ratio of 0.63 to high of 0.70. Alternative 2 ranged from 0.80 to 1.35. Alternative 3 ranged from 1.10 to 2.11. And, Alternative 4 ranged from 0.80 to 1.54. Alternative 3 provided the highest net benefit of the action alternatives in both the low and high travel time scenarios. Thus, Alternative 3 provides the most cost-effective mix of projects of the action alternatives. The model has been re-run to evaluate the Preferred Alternative. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.
L43	SOC	1	James Loring 1815 153rd Avenue Southeast, Bellevue, WA 98007-6141 Agency: Public	It is of course impossible to replace an archaeological site, or fully compensate for the loss of an historic building, with money. Yet the non-financial adverse social impacts may well prove more significant than those outlined in the DEIS. The FEIS must analyze and describe these potential adverse impacts; while they of course have a monetary dimension, the societal costs in a larger sense must be more fully addressed in the FEIS.	To programmatically assess social impacts, results from the noise, visual, traffic, land use, and displacement reports were broken down geographically by city as well as by major element to determine where concentrations of impacts would occur. Using professional judgment, scores were assigned based on the severity of impact and then combined to determine a social impact rating. Please see Section 2.2 and Table 3-1 in the I-405 Corridor Program Draft Social Expertise Report for a

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				Section 3.15 Social Impacts of the DEIS should be re-examined. The methodology described does not take into account differing, perhaps more sophisticated theories of planning and urban development. The third paragraph of Sec 3.15.2 states The cumulative effects of these impacts [as described in previous paragraphs] on jurisdictions as a whole would depend on the location and severity of all the impacts. For example, a high increase in traffic on I-405 (and the noise and visual impacts that may accompany it) may have a low overall social effect if that section of I-405 is located on the fringes of existing neighborhoods. The experiences of Bellevue with respect to transportation decision-making, and more enlightened planning theory, suggest just the opposite. The cumulative impacts may indeed have a relatively lower overall social effect if the adversely impacted section of I-405 is located on the fringes of existing neighborhoods, but both theory and observation dictate the cumulative effects will not be confined to such a "socially acceptable" fringe area. A more realistic appraisal may be that the less socially desirable impacts will tend to be concentrated in those areas of less relative affluence, weaker political representation, and disjoint social organization-those areas with "less pull" than those surrounding it. A more realistic example would be the propensity for capacity expansion on certain arterials in the City of Bellevue, as evidenced by the repeated transportation studies with the objective of increasing arterial capacity, as well as the actual expansion of others. Two cases in Bellevue would be 148th Avenue as a subject of repeated study, and the current construction to expand capacity on 140th Avenue in Bellevue. Conversely, transportation enhancements widely perceived to be desirable, such as traffic calming, tend to be located in areas exhibiting greater relative wealth and social cohesion. Further examples can be seen in the City of Bellevue *2001-2012 Transportation Facilities Plan*.	description of the social impact methodology and the results of the scoring matrix. Social impacts will be covered in greater detail during future project-level environmental analysis, documentation, and review.

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L43	EJ	1	James Loring 1815 153rd Avenue Southeast, Bellevue, WA 98007-6141 Agency: Public	Much of the I-405 Corridor Study addresses the arterials in many of the jurisdictions impacted under these Alternatives, as well as the No Action Alternative. It is reasonable to assume this phenomenon will be predominating in other areas incorporated in the Study Area. Federal law requires that issues of equity be addressed within the scope of the EIS; I submit this issue of environmental equity, the impacts of capacity expansion and automobile traffic in residential neighborhoods, must be **substantially** addressed by WSDOT within the FEIS.	Expected impacts to neighborhoods resulting from the I-405 Corridor Program are discussed in Section 3.15, Social Impacts, of the I-405 Corridor Program Draft EIS. Compliance with Presidential Executive Order (EO) 12898 and Federal Highway Administration (FHWA) Order 6640.23 is discussed in the Appendix G, Environmental Justice, of the I-405 Corridor Program Draft EIS.
L43	SOC	2	James Loring 1815 153rd Avenue Southeast, Bellevue, WA 98007-6141 Agency: Public	The third paragraph of Section 3.15 Social Impacts discusses further the higher social impacts due to multiple environmental effects and physical barriers that an improved road could represent. Of particular interest is the following - … Substantial social impacts are judged to occur if a combination of environmental effects has more than a moderate impact on community cohesion. This would happen if displacements, land use changes, and additional traffic created severe physical or implied separation between major neighborhood components. It would also occur if noise and visual impacts were severe enough to impair community character to the point that the community could not function as a unified entity. Substantial impacts to social interaction would occur if increases in neighborhood traffic or if the scale of physical improvements to roadways prevented neighborhood residents from efficient inter-and intra-neighborhood movement, thereby severely impacting travel patterns and accessibility. As this is the criteria for establishing what constitutes substantial social impacts, an adequate examination of the spatial-social interaction of the residents in each of the municipalities and unincorporated areas in the Study Area must be conducted, and the results made widely available and subject to scrutiny. Such an examination may include, but not necessarily be limited to, the nature and degree of social interaction among various geographic regions of Bellevue. Of particular interest and germane to the DEIS would be the interaction between eastern regions of the City and western Bellevue, and the role an expanded I-405 might have in diminishing social interaction in the City. What have been the effects, if any, of the existence of the current I-405 as an impediment to community cohesion, and what are the adverse effects to be reasonably anticipated in each of the Alternatives of this geographical barrier.	Because of the programmatic nature of this EIS, the analysis of social impacts did not go beyond the city level. That is, impacts to various neighborhoods within a given jurisdiction were not considered; instead, observations of the geographic locations of impacts were used. For instance, if a major arterial widening bisected a city, then a potential social segmentation impact between the two halves of the city was noted. A more detailed social analysis, including community cohesion at the neighborhood level, will occur during future project-level environmental analysis, documentation, and review.

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L43	LU	2	James Loring 1815 153rd Avenue Southeast, Bellevue, WA 98007-6141 Agency: Public	The State of Washington requires under the Growth Management Act that municipalities and counties falling under specific criteria be required to develop a comprehensive plan. The municipalities and counties in the Study area have adopted comprehensive planning, and must use their respective plans as the guiding document in land-use decision-making, as well as adhering to their own policies and public processes. Some form of coordination among comprehensive plans with respect to the I-405 Corridor Project must occur aside from, but not supplanting, the Growth Management hearings process for the adjudication of disputes. Before issues reach the point they require adjudication, some mechanism for policy coordination must be established for any proposed Alternative affecting the Corridor as a whole - a test should be devised to insure policy coordination, and the result at the local level, is adequate and produces desired outcomes.	The I-405 Corridor Program did rely on the adopted comprehensive plans and the transportation elements of the counties and cities. Specifically, the land use analysis is based on those adopted plans, with the modeling variables tied to the projected and designated growth projections for each county and city in the four county area. As stated earlier in response to comments, the action alternatives were compared against the Framework Policies in the Final EIS. Please refer to responses to comments L40.LU-3, L40.LU-4, L40.LU-5, L40.LU-6, L40.LU-7, and L40.LU-8. Additionally, the I-405 Corridor Program has gone through an unprecedented amount of coordination with local jurisdictions. (See Chapter 7 – Public Involvement of the Final EIS for more detail.) Inter-jurisdictional coordination is a major element in this Corridor Program: The inter-jurisdictional coordination began with a steering committee, which includes local agency staff, to further ensure a higher level of participation of local agencies. Ongoing communications with city and county governments have occurred in a variety of venues at several levels, including the involvement of the staff and elected officials of each community within the study area.
L43	LU	3	James Loring 1815 153rd Avenue Southeast, Bellevue, WA 98007-6141 Agency: Public	Land use and transportation are inseparable, and the nature of transportation decisions has a direct effect on the quality of life of all residents in the Study Area. A decision to build a transportation system that emphasizes SOV use (Alternative 4) will lead to less density more sprawl, and a HCT (Alternative 1) will lead to a more compact land use. Hence, any of the Alternatives selected, including the No Action Alternative, is in fact a land use decision as much as it is the selection of a transportation alternative.	Land use and transportation are linked, but as this is a transportation program, the primary focus is on the transportation elements. The Draft EIS does not lose sight of this relationship, as the corridor program provides improved accessibility for those areas designated for growth by regional and locally adopted plans. The Land Use section is accurate and is based on an accepted programmatic approach of SEPA and NEPA. The I-405 Corridor Program does not induce growth. It sets out a transportation

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				In America, localized land use decision-making has been preferred over regional land use planning. GMA requires that each municipality in the Corridor have a comprehensive plan as the fundamental guiding document in land-use and transportation planning. In effect, each comprehensive plan is some variation on the theme of dense land-use and the resulting transportation demand in a civic core, and neighborhood enhancement, protection, and density increases under appropriate circumstances. It is of the utmost importance that the Locally Preferred Alternative (LPA) chosen for the Corridor is in overall conformance with the overall philosophy of localized comprehensive planning in the effected municipalities and unincorporated areas. It is acceptable that the effective participation of as many citizens as possible to some level is desirable, and facilitating their ability to address localized land-use activities and influence decision-making enhances their effectiveness and willingness to participate. Their ability acting as individuals to influence the outcome of a localized land-use decision is much greater than their marginal ability to influence the outcome of a regional transportation project such as the selection of a LPA in the I-405 Corridor. The LPA best in keeping with the comprehensive plans for the regional cities should enhance the opportunities for individuals to influence both land use and transportation decision-making, and hence the eventual selection of the LPA in this Study.	infrastructure that provides greater accessibility consistent with *Destination 2030* and adopted local land use and transportation plans. It also contributes to achieving the state GMA mandate of concurrency for transportation to serve the region's UGA. The Corridor Program may affect the timing and pressure for growth in the region. Specifically, the model indicates the change in pressures on the regional growth that is projected and planned for up to 2030. Although it is not termed "Local Preferred Alternative," the Preferred Alternative is consistent with regional and local planning. Please also refer to responses to comments L40.LU-1 and L40.LU-2. Furthermore, public participation is very important to any public project and we welcome the continued participation of the public on this project.
L44	O	1	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	I am a Board member of Livable Communities Coalition, and am sending in this written testimony to supplement my testimony in person. Our organization advocates for healthy equitable, sustainable communities in Central Puget Sound. We have 24 organizational members and 117 individual members. We are concerned that the costs of these alternatives are too high, both the costs in dollars and the environmental and social costs. I am also concerned about the health costs because of my work as a physician. In the preferred alternative 3 the cost of increasing general purpose road capacity, 76% of the total, is $5.1 billion. The cost in air quality, global warming gases, noise, neighborhoods, accidents, and induced traffic is too high.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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L44	TR	1	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	I believe that planners are now shifting from goals of increasing speeds and capacity to 1) enhancing access to jobs, stores, schools, and services 2) diverse travel options 3) reducing length of trips and Vehicle Miles Traveled and 4) reduced speeds.	Many of these factors are considered in the Draft EIS criteria.
L44	TR	2	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	There is currently growing research that shows that more and wider roads create more traffic, above that attributable to population growth, or even income growth. One study in the Mid-Atlantic region showed a relationship between highway capacity and level of travel, and it appeared that a 10% increase in lane mileage could result in a 2-6% increase in total VMT. (Fulton and Noland). A study at the University of California, Berkeley (Hansen and Huang) showed induced traffic impact from building roads in California. They found this effect to be strong, with the long-run elasticity of state highway VMT to state highways inlane miles (SHLM) in the 0.6-0.7 range for counties and around a 0.9 for metropolitan areas.	Refer to the response to comment E66.SOL-1. The Final EIS includes a more detailed discussion of the effects of induced travel, which has been considered heavily in the travel forecasts produced for the I-405 study. The oft-cited Hansen research concluded that the primary determinant of induced travel (i.e., increases in VMT) is population change (40 percent of effect), while the effects of added lane miles (i.e., capacity) account for less than 10 percent of the induced travel effect (Hansen, Figure 3, p. 216). Hansen's findings also only pertained to state highways, and did not include the effects on other arterials or local streets.
L44	TR	3	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	The concept of generated traffic is a concern here. When the "cost" of travel decreases because of added capacity, people will likely travel more. The U.S. Dept. of Transportation concluded that models that fail to incorporate feedback (the idea that congestion causes people to change their behavior) tend to underestimate future congestion delays, and overestimate the benefits of roadway capacity expansion. In a study "Why Are the Roads So Congested? A Companion Analysis of the Texas Transportation Institute's Data on Metropolitan congestion" done in 1999 by the Surface Transportation Policy Project, metro areas that invested heavily in road capacity expansion fared no better in easing congestion than metro areas that did not.	Refer to the response to comments L44.TR-2 and E66.SOL-1. The I-405 corridor program travel forecasts included a substantial portion of induced, or generated, traffic. With respect to the STPP report, our review of the underlying Texas Transportation Institute data and discussions with TTI staff showed relatively weak relationships between various indicators of added capacity (e.g., lane miles, lane miles per capita) and congestion (e.g., the TRI index in the TTI studies). While the STPP report did a credible job of extracting and analyzing certain data for the purposes of its study, it is also clear to us that there are many confounding factors within the TTI database that could also lead to other conclusions.
L44	TR	4	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	Vision 2020 has many comments about reducing "auto dependency", "shifting emphasis from highways and single occupancy vehicle traffic to travel options." Yet with Alternative 3, $5>1 billion would go to general purpose lanes. That is 76% of the total package, which doesn't seem like a shift in emphasis at all.	Alternative 3 includes a broad range of roadway, transit, TDM, and nonmotorized improvements. Transit use increases, while the TDM package included in the alternative is projected to increase carpool and vanpool use.

Code Number			Name	Comment	Response
L44	O	2	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	I am also concerned about health effects of increasing road capacity. The Center for Disease Control has noted that rates of obesity have skyrocketed in the past 20 years. Also in the last 20 years trips made by walking declined while driving trips increased, one fourth of trips are one mile or less but 3/4 are made by car. The CDC has been promoting "Active Community Environments" - which are places where people of all ages and abilities can easily enjoy walking, bicycling, and other forms of recreation. The CDC estimates that physical inactivity and unhealthy eating contribute to at least 300,000 preventable deaths per year. In the US 29% of the population are get little or no exercise (they are sedentary), and 73% are not active enough. More than 30% of adults are overweight.	Analysis and discussion of the relationship between automobile dependence, obesity, and public health is outside the scope of this EIS.
L44	LU	1	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	The urban form can influence levels of walking and bicycling. Higher densities, greater mixing of land uses, grid street networks can make walking and bicycling easier. In Alternative 3, with 76% of the money going into general capacity lanes, it is difficult to see how this would promote denser land use patterns in the I-405 corridor.	The I-405 Corridor Program alternatives include elements beyond road capacity; however, road capacity will improve accessibility to those areas of existing and projected growth on the Eastside, which includes the Urban Centers. The I-405 Corridor Program does take into account the importance of supporting the existing and future urban form within the centers on a multimodal approach. Specifically, there are a range of bicycle and pedestrian corridor improvements in Bellevue, Bothell, Renton, Newcastle, and throughout King and Snohomish counties. The Urban Centers and associated suburban areas will have greater connectivity for not only automobiles, but also pedestrians and bicycles based on the demand and desired urban form. Urban Centers have definite urban forms that promote walking and bicycling. The actual expense of the roadway capacity element may be higher than other elements; however, some of the elements mentioned above are still effective but with a lower capital cost. A lower cost for an element does not dilute the importance in a multimodal approach.
L44	AQ	1	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	In terms of air pollution, Vehicle Miles Traveled (VMT) in King County continues to increase each year- with 16 billion miles traveled in 1999. The single occupancy vehicle is a prime contributor to air pollution in our area.	Your comment is acknowledged.

Code Number			Name	Comment	Response
L44	AQ	2	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	I have concerns about specific sections of the DEIS. There are serious concerns about the effects of the Alternative 3 on air quality, yet section 3.1.4.4 states that "While VMT would increase relative to the No Action Alternative, average speed would increase substantially, resulting in decreased emissions per mile traveled relative to the No Action Alternative." It also states that "Emissions of greenhouse gases are also expected to be lower under Alternative 3 than under the No Action Alternative." While emissions per mile go down with increasing speeds, the assumption that Alternative 3 will only increase speeds without attracting more drivers is very questionable. while it might be argued that Transportation Demand Management could offset some of the attraction for drivers, some TDM methods work best with some level of congestion.	Vehicle emissions are speed dependent. The highest emission rates are from idling vehicles stopped in congested traffic. Emissions modeling considers both VMT and operating speed of each roadway in calculation of regional emissions. Long-range modeling for the Puget Sound region demonstrates that the volume changes among alternatives were not as significant a factor as speed. Also refer to response to comment E66.SOL-1 on induced travel.
L44	TR	5	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	In Section 3.12.1.1 transportation performance measures are mobility, congestion, and safety. Yet travel itself is rarely a primary goal, rather access to jobs, shopping, schools and services. Most of the measures noted are not relevant for a pedestrian or a bicyclist, who use modes that are to be encouraged, according to Vision 2020. To do this, new performance measures specifically for pedestrians and bicyclists are needed.	The Preferred Alternative includes a variety of nonmotorized improvements for crossing I-405 as well as for improving the regional trail network within the I-405 corridor. The interstate facility does not allow bicyclists nor pedestrians on the facility. The facility does connect to local pedestrian and bicycle systems, and those were evaluated under the criterion of mobility, and measured by the effectiveness of the connections to local systems.
L44	TR	6	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	In Section 3.12.4.4 under congestion impacts is stated that in Alternative 3 the substantial added capacity would result in a VMT increase of up to 13%, but that the TDM program would reduce daily VMT by 3 to 6%. It states that the reduction would offset part of the VMT increase from the added capacity. I am not aware of empirical studies that would document how TDM might offset the effects of simultaneous increases in capacity, and think that some TDM works better with some level of congestion.	The reduction in VMT from TDM was considered first, then the increased VMT that could be accommodated from the increased capacity was estimated on top of that. Regardless, demand is not fully met by TDM, increased capacity, and transit combined.
L44	TR	7	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	In Section 3.12.4.4 under safety impacts, is the assertion that the two general purpose lanes would improve the geometrics of the corridor. It states that system-wide, while accidents would increase on I-405, there would be a net reduction in total accidents in the study area because of a shift in traffic away from more hazardous arterial streets. It seems questionable that after these lanes are added that there will be less traffic on arterial streets. It seems much more probable that there will be more cars on all roads, with more accidents.	The analysis showed a reduction in travel on key arterial routes due to the attractiveness of I-405. Alternative 3 would result in a 7 percent reduction in daily vehicle miles of travel on arterials compared with No Action. Conversely, VMT would increase by 70 percent on I-405.

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L44	COST	1	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	I am wondering why there was not an analysis of the cost/benefits between each mode of travel in the beginning of the DEIS. For example, a description of the effects of an equal investment, say $100 million, of TDM alone, as well as the effects of $100 million of pedestrian/bicycle improvements alone, $100 million of transit improvements alone, then $100 million of general capacity improvements. After that, various combinations co7uld be studied. However, this DEIS blurs the relative cost/benefits of different modes, at times using one to offset another.	See response L43.COST-1 for how the benefit/cost analysis was accomplished and the outcome. Initial screening included evaluation of seven themes that ranged from transit-only improvements to roadway-only improvements. The four alternatives evaluated in the Draft EIS were developed from combining the modal elements that were evaluated in the STEAM model. Again, they ranged from having a transit emphasis to having a roadway emphasis.
L44	SOL	1	Margaret Kitchell 911 - 230th Avenue E Seattle, WA 98112 Agency: Livable Communities Coalition	I urge you to study the alternative proposed by Sensible solutions for 405. This includes a) smart growth-financial incentives to encourage more jobs and housing to locate in centers with transmit, walking and biking, b) trip reduction: more innovative incentives such as flexpass, parking cash out, vanpools. (The DEIS notes that up to 78% of work trips are SOV's, higher than the average for King County.) c) strategic investments in choke points. (In the DEIS are graphs showing that most of the congestion is in the South End, most likely from the S-curves, grades, and complex interchanges such as I-5 and SR 167 - why not go for these first?) d) strategic transit improvements e) pricing and f) neighborhood protection. Least cost approaches have been urged for transportation. Our coalition believes we need to look both at the dollar costs and what would keep our communities healthy, equitable and sustainable. I hope that you will also study the Sensible Solutions for 405 alternative.	Please refer to response to comment E66.SOL-1. Each of the alternatives focuses attention on the choke points along the corridor. Several of these improvements will likely be prioritized early in the project implementation. An early action strategy is being developed that may include fixing these chokepoints along with early expansion of transit and environmental protection (including neighborhoods).
L45	O	1	Don Cairns 15670 NE 85th St PO Box 97010 Redmond WA 98073-9710 Agency: City of Redmond Public Works Department	The City of Redmond appreciates the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS) for the I-405 Corridor Program. The City commends the Washington State Department of Transportation (WSDOT) and its partners for undertaking this study as a national pilot project demonstrating a new way to implement the National Environmental Policy Act (NEPA). The City of Redmond would also like to commend the WSDOT on their efforts to involve effected agencies and the public throughout the process in an effort to develop and analyze alternatives that address the needs and concerns of the diverse stakeholders within the study area. We find that the I-405 Corridor Program DEIS is a well-organized document that, in most cases, adequately analyzes the environmental impacts of the alternatives.	Thank you for your comment.

Code Number			Name	Comment	Response
L45	O	2	Don Cairns 15670 NE 85th St PO Box 97010 Redmond WA 98073-9710 Agency: City of Redmond Public Works Department	The City of Redmond's comments focus on the areas of travel demand management (TDM), project phasing, managed lanes and transportation pricing, fixed guide-way high capacity transit (HCT), and corrections to Redmond projects included in Appendix A.	Thank you for your comment.
L45	TR	1	Don Cairns 15670 NE 85th St PO Box 97010 Redmond WA 98073-9710 Agency: City of Redmond Public Works Department	We support the inclusion of Transportation Demand Management as a key element in each of the alternatives. However, we would like to underscore that the assumed level of TDM effectiveness in the DEIS is ambitious (3-6% of total daily VMT for the TDM program common to each action alternative). Moreover, since approximately 1/3 of the estimated TDM effectiveness is attributed to land use that is controlled by local governments, we are strongly interested in obtaining greater specificity in the Final EIS (FEIS) on the types of programs, actions and funding levels that are envisioned to implement this element and achieve the estimated results. As a local jurisdiction that offers a wide breadth of services to our constituents on a fixed budget, we would like additional clarification provided in the FEIS on the anticipated annual costs to local governments of implementing such programs, as well as the specific funding levels and revenue sources anticipated. Also, we request that in the Final EIS you emphasize that the assumed effectiveness of the TDM strategy is dependent on a significant level of on-going funding for the TDM programs and for the operation of the alternative modes (e.g. both regional and local transit) that does not currently exist. Without this funding, local jurisdictions are generally not able, or prepared, to take on additional programs and their associated costs. Similarly, we request that you modify the language on page 2-15 in the final paragraph that "Annual [roadway] maintenance and operations costs are [typically] funded from jurisdictions through their on-going programs."	Land use decisions are controlled by local governments. Based on input from local jurisdiction representatives, we substantially increased the amount of funds within the TDM program that would be focused on land use strategies. We have stated that these strategies would be further detailed collaboratively with the jurisdictions at such time as funding is assured. The Final EIS does not include a funding program, but a companion implementation plan has been developed. Specific costs for TDM are itemized in the Final EIS in Table 2.2-2. We have modified the language on page 2-15 of the Final EIS as suggested.

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L45	SCH	1	Don Cairns 15670 NE 85th St PO Box 97010 Redmond WA 98073-9710 Agency: City of Redmond Public Works Department	All of the alternatives included in the I-405 Corridor Program include many projects and programs representing many different transportation modes. As noted in the document, a key issue is the phasing of improvements to minimize impacts and costs. It is important that the final preferred alternative and FEIS consider the potential positive impacts of early implementation of fixed-guideway HCT, bus rapid transit, and other projects and programs to minimize the overall impacts and costs of the program. We realize that detailed phasing is not required, as part of the EIS. However, certain programs should be implemented first as mitigation for other projects and to take advantage of opportunities. The FEIS should identify major projects and decisions that need to be undertaken to successfully implement project phasing and the final I-405 Corridor Program.	Developing early implementation strategies is critical to the success of this project. Phasing plans will be developed upon adoption of the Preferred Alternative now that the Preferred Alternative has been adopted into Puget Sound Regional Council's *Destination 2030* MTP.
L45	TR	2	Don Cairns 15670 NE 85th St PO Box 97010 Redmond WA 98073-9710 Agency: City of Redmond Public Works Department	Transportation pricing and lane management are issues that have not been fully addressed as part at the current level of analysis in the DEIS as noted on page S-10 and S-12 respectively. The implementation of transportation pricing in the corridor and/or the implementation of lane management on new lanes included in the final preferred alternative would optimize vehicle throughput and minimize delay , in addition to the VMT reduction specified in table 3.12-12 of the DEIS. Further analysis of these mechanisms is also important because of the current shortage of transportation funding in Washington State. The Blue Ribbon Commission on Transportation and the Puget Sound Region's Metropolitan Transportation Plan also identifies these concepts as potential tools to help fund major transportation projects such as the I-405 Corridor Program , . The City of Redmond suggests that these two issues be analyzed in more detail as part of the FEIS or as part of future studies for the corridor.	Pricing strategies were evaluated in the Draft EIS using regional data available from the PSRC. This was intended to be a fairly broad assessment of how a regional pricing program could affect the I-405 Corridor Program. The Preferred Alternative includes a recommendation to further study pricing in a separate regional effort. We assume lane management in your comment refers to intelligent transportation systems and/or incident management programs. Both of these efforts are included within the action alternatives and the Preferred Alternative.

Code Number			Name	Comment	Response
L45	TR	3	Don Cairns 15670 NE 85th St PO Box 97010 Redmond WA 98073-9710 Agency: City of Redmond Public Works Department	The fixed-guideway HCT included in both Alternative 1 and 2 of the DEIS is a physically separated system that does not travel in I-405, I-90 and SR 520 right-of-way throughout most of the study area. While we understand the rationale stated in the DEIS regarding using the current fixed-guideway HCT alignments in both Alternatives 1 and 2, it is also important to evaluate the impacts and costs of other alignments before the FEIS and preferred alternative are finalized. The City of Redmond requests that the FEIS evaluate the costs and impacts of alternative fixed-guideway HCT alignments that take advantage of the existing right-of-way in the I-405, I-90 and SR 520 corridors as part of Alternative 2.	This programmatic EIS focuses on broad issues such as mode and corridor choice. Project-level alignment decisions will be made following additional environmental investigations, such as Sound Transit Phase 2. The resulting fixed-guideway HCT alignment in Alternatives 1 and 2 used a combination of Burlington Northwen Santa Fe (BNSF) railroad, I-405, and new right-of-way in order to serve as many activity centers as possible and provide convenient connections into neighborhoods and business centers. The system included HCT across Lake Washington, consistent with the Trans-Lake Washington Study assumptions. It also included HCT links to downtown Redmond and Issaquah using much of the SR 520 and I-90 freeway corridors. These are consistent with your request. The technology of the HCT was not specified, as it would be premature and inconsistent with the intent of the programmatic document. However, care was taken to identify segments that would likely need to be elevated, tunneled, or surface in design. These assumptions produced an HCT system that made maximum use of existing rights-of-way such as portions of I-405 and the BNSF. The Draft EIS Appendix A.4 identified the alignment assumptions used in the HCT analysis. An HCT alignment that only used the freeway rights-of-way was not considered reasonable, since many key activity centers would have been bypassed. The studied alignment along the BNSF included several important deviations to serve these centers, such as downtown Bellevue, Factoria, Eastgate, and downtown Kirkland. These alignment assumptions were reviewed with and approved by the project committees during the definition of the EIS alternatives. In conducting the environmental analysis, it became clear that the HCT system would have impacts whether it was at-grade, underground, or elevated. The Draft EIS captures what we believe is a reasonable worst case set of impacts. An elevated system, for example, still requires right-of-way to accommodate columns and stations. The current Elevated Transit Company examination confirmed these findings as part of its monorail studies in Seattle. The per-mile capital costs of monorail were found to be comparable in many cases to the estimated costs of the HCT system evaluated in Alternatives 1 and 2.

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					The choice of the BRT system in the Preferred Alternative was based upon its similar ridership projections to a fixed-guideway system, while having substantially lower costs. The BRT also was seen as having an advantage of easily serving a variety of regional and local transit trips that are prevalent in the study area. The I-405 Corridor Program Executive Committee also recommended further study of additional HCT technologies within the "core" area. This core area includes much of Bellevue, Kirkland, and Redmond. In summary, the fixed-guideway HCT evaluated in Alternatives 1 and 2 represents a logical system to serve the major transit markets in the I-405 corridor. It takes advantage of available rights-of-way, where reasonable, and deviates into major activity centers where it is essential to capture transit mode shares. A predominantly freeway-based fixed-guideway system was not seen to meet these objectives.
L45	TR	5	Don Cairns 15670 NE 85th St PO Box 97010 Redmond WA 98073-9710 Agency: City of Redmond Public Works Department	Included in the table below are corrections related to specific projects that involve the City of Redmond, as shown in Appendix A - I-405 Corridor Program Major Elements of Alternatives of the DEIS. These technical corrections are meant to better reflect our understanding of the current status of these projects. (see table in original correspondence)	Thank you for the clarifications, which have been incorporated into the Final EIS.
L45	O	3	Don Cairns 15670 NE 85th St PO Box 97010 Redmond WA 98073-9710 Agency: City of Redmond Public Works Department	Once again, the City of Redmond would like to thank the project team for their hard work in initiating and proceeding through this innovative NEPA process. The City of Redmond looks forward to being an active participant as we move forward in selecting and implementing a final preferred alternative. If you have any questions about our comments, please contact me by phone at (425) 556-2834 or by e-mail at dcairns@ci.redmond.wa.us.	Thank you for your comment.
L46	O	1	Dave Zabell 9654 NE 182nd St Bothell, WA 98011 Agency: Public Works, City of Bothell	Thank you for the opportunity to review the DEIS (Draft Environmental Impact Statement) for the I-405 Corridor Program. The City of Bothell would like to commend WSDOT on a job well done in reinventing the NEPA process by measure of a national pilot project approach to implementing NEPA. This two-year long process of cooperative efforts by all stakeholders has resulted in a very open process where information regarding the development and analysis of the various alternatives was easily accessed by	Thank you for your comment.

Code Number			Name	Comment	Response
				committee members and the public. The City supports the efforts of Washington State Department of Transportation, Federal Highway Administration, Federal Transit Administration, King County Department of Transportation and Central Puget Sound Regional Transit Authority to solve traffic congestion and improve personal and freight mobility throughout the I-405 corridor over the next 20 to 30 years. We understand that the current environmental study of the I-405 Corridor Program is a programmatic EIS, and that details of the specific impacts and designs will be examined at specific project levels. At this level of program study, the City finds that the impacts of these alternatives are adequately addressed.	
L46	ALT	1	Dave Zabell 9654 NE 182nd St Bothell, WA 98011 Agency: Public Works, City of Bothell	In order to meet the purpose and need for the I-405 Corridor Program, we concur with the Executive Steering Committee's preliminary preferred alternative (PPA). The PPA builds on the Alternative # 3 with a balanced array of transportation modes in meeting the challenges of mobility and protecting the environment. We are in agreement that care has been exerted to the fullest extent to avoid and minimize the impacts of the PPA and find that the DEIS contains adequate mitigations of those impacts, and in many cases, additional enhancements that would improve environmental conditions beyond their current condition. The following are comments that we would like you to consider:	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L46	N	1	Dave Zabell 9654 NE 182nd St Bothell, WA 98011 Agency: Public Works, City of Bothell	· Noise: Noise walls/barriers should be considered where residential homes are affected significantly by traffic noise.	Tthe potential for noise increases under each of the alternatives was evaluated. Noise impacts at specific locations along the corridor, along with mitigation measures, including noise walls, will be evaluated in the future as specific projects are developed for individual areas of the corridor.
L46	WR	1	Dave Zabell 9654 NE 182nd St Bothell, WA 98011 Agency: Public Works, City of Bothell	· Water Resources: Retrofit storm water quantity and quality facilities for new and existing impervious surfaces and provide storm water treatment to meet current Ecology standards and local agencies storm water standards. It is important to look for opportunities to implement programs and facilities at the watershed approach to provide the most effective outcome for fish survival and return rates to the lakes, rivers and streams. This will require short and long-term improvements with continuous monitoring of the mitigations, and taking appropriate measures to correct deficiencies which may arise.	The I-405 Corridor Program will comply with the requirements of Washington State Department of Ecology's Stormwater Management Manual for Western Washington or functionally equivalent guidance. One of the objectives of the Early-Action Mitigation Program will be to identify mitigation opportunities at the watershed level.

Code Number			Name	Comment	Response
L46	FATE	1	Dave Zabell 9654 NE 182nd St Bothell, WA 98011 Agency: Public Works, City of Bothell	· Endangered Fish Species: With the listing of Chinook salmon and Bull trout as threatened species, North Creek poses some challenges and opportunities for mitigations and preservation of key corridor buffers and riparian areas critical to providing better biological and other functional values. There are clearly opportunities to depart from the traditional on-site mitigations in those cases where unavoidable impacts are experienced to consider a watershed-wide approach that would provide better results than otherwise if implemented on a case by case basis. Regulatory agencies should become partners to the solution, and funding be provided to those agencies for the development and implementation of the mitigations.	Challenges and appropriate opportunities will be considered as part of the program and project mitigation identification.
L46	O	2	Dave Zabell 9654 NE 182nd St Bothell, WA 98011 Agency: Public Works, City of Bothell	· Early Actions: A number of early action mitigations should be considered. The goals and objectives of early action mitigations should be clearly defined. Some ideas of early actions that have been considered during this study are purchase/preservation of right of way, deploying vanpool programs and construction of local street improvements to help mitigate traffic impacts during construction as well as pond and restoration construction projects to provide early mitigations that have the potential of improving fish and aquatic habitats.	To help address your comments, WSDOT has prepared and is implementing a proposed early-action environmental impact mitigation decision-making process. In addition, commitments to specific mitigation have been added throughout Chapter 3 of the Final EIS.
L46	SCH	1	Dave Zabell 9654 NE 182nd St Bothell, WA 98011 Agency: Public Works, City of Bothell	· Construction Timeframe: With the passage of new legislation to allow design-build projects for such major public infrastructure investments, it is important to begin planning and coordination of construction phasing. There are opportunities for funding packages to be developed in concert with local jurisdictions to coordinate construction staging where local projects are already programmed to occur. These strategies to combine construction project scopes can often result in minimizing traffic congestion and other construction related impacts in addition to minimizing project costs. In the case of the north end of the I-405 corridor, construction of the South Access for the University of Washington Bothell/Cascadia Community College Campus of the SR 522/I-405 Interchange is slated for 2004/2005. This prompts an opportunity to combine the proposed I-405 freeway and interchange improvements into this project to insure that staging of a combined construction project be seriously considered for its merits. The public expects the government to solve short and long-term traffic problems and often these early planning efforts to insure funding packages and project coordination serve to maximize public investment.	The need to coordinate construction of the I-405 Corridor Program projects with other area projects is essential for minimizing costs, reducing construction impacts, and maintaining public confidence. Phasing opportunities will be affected by the ability to fund the improvements. Development of implementation plans is an important part of the process to assure coordination.

Code Number			Name	Comment	Response
L46	O	3	Dave Zabell 9654 NE 182nd St Bothell, WA 98011 Agency: Public Works, City of Bothell	Once again, thank you for giving us the opportunity to comment on this DEIS. The City of Bothell will continue to actively participate with the I-405 project team efforts in further developing the preferred alternative for the Final EIS.	Thank you for your comment.
L47	O	1	Warren W. Buck 18115 Campus Way NE Bothell, WA 98011-8246 Agency: University of Washington, Bothell	This is a letter of support for the I-405 Corridor Program and the Draft Environmental Impact Statement (DEIS) in reference to it. We are continually dependent on smoother traffic flows all around the state and particularly so in Western Washington. Within Western Washington traffic issues around the Eastside of Puget Sound are becoming more important as populations, business, and educational opportunities rise. The I-405 Corridor Project is a great proposal that will benefit from full support by all levels of our citizenry. As the student enrollment continues to grow at the University of Washington, Bothell along with our co-located partner, Cascadia Community College, we will use the I-405 Corridor even more than we now do. More to the point, the proposal has lots of merit and is sensitive to all parties. Through this, it looks like we can all make our transportation issues better. Thus, I support fully the proposed I-405 Corridor Program and its DEIS.	Thank you for your comment.
L48	ALT	1	Jessica N. Greenway 7405 131st Place NE Kirkland, WA 98033 Agency: Public	I am taking the time to write my comments about the I-405 Corridor Program because I really care about my community. I think some good work has been done to come up with the 4 alternatives proposed, and I think all of them have some good components, but I don't agree with or support Alternative #3 or #4. I think both of these alternatives are too expensive and will expand I-405 to the detriment of surrounding communities with no lasting solution to problems or congestion. I do not support construction of additional lanes on I-405, with the exception of adding lanes which serve to make the number of lanes consistent along the entire route. Alternatives #3 and #4 are both too expensive, will take too long to implement, will result in long disruptions because of construction, and will not produce a lasting solution to congestion.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L48	SOL	1	Jessica N. Greenway 7405 131st Place NE Kirkland, WA 98033 Agency: Public	I agree with Alternative 5, which has been proposed by Sensible Solutions for I-405. This plan is reasonable and rational, more affordable, and deals realistically with transportation solutions. I support this alternative, and am willing to help pay for it. Please call me at my office, 206-292-2103, with questions. Thank you very much.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
L49	O	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	Attached, are the comments of Snohomish County staff members who reviewed various chapters of the Draft Environmental Impact Statement (DEIS) for the I-405 Corridor Program. The first section of the attachment contains a number of more general comments, some of which you may have seen or heard during discussions at the Executive and Steering Committees. In the remainder of the report, are our comments grouped by subject area. We will provide you, in advance of the all-committees meeting on October 30, 2001, with a short list that shows in sequence of our priorities the improvement projects that are located in Snohomish County. We hope that the information in the attachment is useful in the development of the Final EIS and we are looking forward to the response to the numerous questions that were raised. The I-405 Corridor Program Draft EIS provides a thorough programmatic level analysis of the alternatives proposed in the corridor area. We appreciate the opportunity to review the information-packed document. Feel free to call me if you desire any explanations or would like to communicate directly with individual authors of the submitted comments.	Thank you for your comment.
L49	O	2	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	A number of individuals, largely professional staff from the Department of Public Works, have reviewed the I-405 Corridor Program DEIS. Their comments and questions have been compiled and are presented in this brief report. At the beginning are several general comments and concerns of the county, most of which have been voiced during meetings of the Executive and Steering Committees in the course of discussion on the technical work. The remainder of the report addresses specific issues that have been raised by individual reviewers of the text on specific subject areas.	Thank you for your comment.
L49	SOL	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	Include in the program a transit center in the SR 527 corridor in the vicinity of 196th Street SE and one or two strategically located P&R lots.	These ideas have been considered in the context of defining the Preferred Alternative transit program.

Code Number			Name	Comment	Response
L49	SOL	2	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	If Bus Rapid Transit (BRT) is part of the I-405 corridor transit improvements, extend the BRT service to SR 527. From there, the BRT bus would leave I-405 and travel north on SR 527 in an HOV lane up to the Mill Creek civic center area making perhaps two or three stops enroute. The bus would then turn around and return via SR 527 to I-405 and travel to the BRT stations along the I-405 corridor. Many citizens in Snohomish County support public transit and the enhancement of Park & Ride facilities.	This suggestion has been considered during the development of the Preferred Alternative.
L49	SOL	3	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	In developing an implementation program, the project team should give high priority to measures that can be brought on line without major construction activities and the detrimental environmental impacts associated with it. These projects could include TDM measures and improvements in transit services (shorter headways and better coverage/connectivity). Combined with an early start of the implementation of identified environmental impact mitigation projects, these measures could go a long way in establishing the credibility of the I-405 Corridor Program and of the public agencies involved in it.	Providing advance traffic and environmental mitigation will be important to the successful implementation of the I-405 Corridor Program.
L49	SOL	4	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	Snohomish County favors the preservation of the BNSF right-of-way for future transportation purposes such as fixed guideway transit, BRT, or pedestrian/bicycle trail use. If purchase is the only way this can be accomplished, then the timely acquisition of this right-of-way should be included as a first step in this long range program.	The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way.
L49	TR	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	We understand that even in the Preliminary Preferred Alternative (PPA) the actual widening of the I-405 corridor may provide from SR 527 to I-5 only one additional lane plus significant extensions to the merging lanes at I-5 (SB and NB) in order to address the issue of lane balance at these points. An analysis of the projected traffic conditions that would be experienced after the completion of the presently ongoing HOV lane construction program could provide the information needed make a more informed decision on this issue. Snohomish County will support a solution that minimizes the addition of new and widening of existing roadways.	The preliminary preferred alternative represented the I-405 Corridor Program Executive Committee's then current thinking on the direction of the program. The preliminary preferred alternative was a non-binding polling of the committee based on information provided in the available expertise reports and preliminary feedback from the Steering Committee and Citizens Committee. The Preferred Alternative includes widening of I-405 by up to two lanes in each direction in the section noted, plus improvements to I-5 connecting to I-405. Additional analyses will be conducted during subsequent project-level studies.

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L49	TR	2	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	The impact of I-405 Corridor improvements on adjacent arterials needs to be addressed. Of particular concern is the need for additional capacity in the 39th/35th Avenue SE corridor if 120th Avenue NE in King County (Bothell) is extended across SR 522 and connected to the Woodinville-Redmond Road (SR 202).	The Draft EIS discusses arterial impacts at a system level. The Final EIS (Section 3.12) provides further identification of arterial impacts. A separate environmental study of the 39th Ave corridor is being conducted by Bothell and Snohomish County. The Preferred Alternative assumes improvements will be made in the 39th Ave corridor.
L49	O	3	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	It is important that local governments continue to maintain control over the timing and location of major improvements to the transportation network and services within their respective jurisdictions.	Thank you for your comment.
L49	O	4	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	1. The programmatic Draft EIS provides a thorough programmatic level analysis of the I-405 corridor project area. In general terms, the EIS should provide an adequate level of analysis sufficient to make corridor-level broad based decisions regarding the overall design approach.	Thank you for your comment.
L49	TR	3	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	2. Alternatives 1 and 2 identify a high capacity transit system consisting of a fixed-guideway rail system. The DEIS lacks detail with regard to the location and design of the proposed rail system. The DEIS states only that the rail system would likely use portions of the BNSF railway. More detail with regard to design requirements, location, environmental conditions, and associated impacts of constructing the railway would be helpful in the alternative selection process.	Locational details for the HCT lines examined in Alternatives 1 and 2 were presented at public meetings. These details are shown in Appendix M of the Final EIS.

Code Number			Name	Comment	Response
L49	TR	4	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	3. It should be noted in the summary that Alternatives 3 and 4 rely entirely on increased capacity for vehicular modes of transportation, cars and buses, to alleviate traffic congestion along I-405. It's worth noting in the environmental document that this would have the net affect of furthering the region's reliance on fossil fuel consumption well into the 21st century.	Alternatives 3 and 4 include multimodal solutions to traffic congestion, including an extensive TDM program. Capacity increases for cars and buses are integral to those alternatives.
L49	WR	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	4. All four project alternatives require the filling of wetlands , riparian encroachments, and increased impervious surfaces. The majority of the I-405 corridor is within urbanized watersheds that average between 30 and 40 percent impervious surface as the baseline condition.	These impacts and acknowledgement of impervious surface in the study area are described in the Draft EIS.
L49	O	5	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	5. Most of the permits required for the project are from various federal, state, and local resource agencies. Given that the general guidance for environmental impacts is to first avoid and minimize impacts, it seems unlikely that resource agencies would look favorably on an alternative that includes avoidable impacts. Some level of discussion with regard to which option would have the least overall environmental impact while still achieving the desired transportation goal is warranted in the DEIS.	The Draft EIS compares the effects of the alternatives and identifies the alternative that would have the least environmental impact for each element of the environment. However, because no one alternative has the least impact for every element of the environment, reasonable parties can disagree on which alternative has the least overall impact while still achieving the desired transportation goal. The Preferred Alternative is among the alternatives with the least overall environmental impact. It also strikes a reasonable and effective balance between avoiding and minimizing environmental impacts on the one hand and achieving the performance objectives expressed in the purpose and need for the I-405 Corridor Program on the other.
L49	PN	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	6. The purpose statement for the I-405 Corridor Program could have been made more relevant by the addition of the following wording to the second bullet "by pursuing a solution that causes the least amount of environmental degradation possible through the use of best management construction practices and mitigation measures."	The objective of least environmental degradation is being pursued through the corridor environmental program and early action mitigation process. As one of the pilot projects under the "Reinventing NEPA" process, the I-405 Corridor Program had to obtain written approval (concurrence) on the statement of purpose and need from agencies with jurisdiction. Snohomish County was among the more than 20 local jurisdictions and state and federal agencies that helped to draft the statement of purpose and need at the beginning of the EIS process, and then concurred to adopt it. It would not be appropriate to revise the statement of purpose and need at this stage in the EIS process.

Code Number			Name	Comment	Response
L49	TR	5	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	1. Page S-6 No Action Alternative – "By 2020, the PSRC model assumes that employment-area parking costs in the area will increase due to market forces, creating greater demand for transit (add here) and transportation demand management (TDM) measures."	This has been modified in the Final EIS.
L49	TR	6	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	2. Page S-11 TDM Effects - "The I-405 Corridor Program studied inclusion of a TDM program within the I-405 corridor. The empirical estimates of the TDM programs' effectiveness were unable to be fully integrated within the travel forecasting procedures so the exact effects of such a program are not known. Additional research is being conducted to compare the I-405 Corridor Program study results with others around the country."	Your comment is acknowledged.
L49	TR	7	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	3. With the preliminary analysis concluding specific share reductions in daily, a.m., and p.m. SOV travel, how, exactly will the final results (if completed prior to final doc. production) be incorporated into the travel model results?	The model has been rerun for the Preferred Alternative; the results are documented in the FEIS in Section 3.12.
L49	TR	8	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	4. Page S-10 Regional Transportation Pricing – Will the costs/benefits of congestion pricing, as identified for possible implementation in Alternative 1, be incorporated into the final report? Table 3.12-12 on page 3.12-24 documents an estimated 15% reduction in daily travel demand (no estimate for a.m./p.m. pk. period reduction).	Additional documentation of congestion pricing effects has been included in the FEIS in Section 3.12.

Code Number			Name	Comment	Response
L49	TR	9	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	5. Page S-11 HOV Demand - "Additional analysis is being conducted to further delineate the HOV components of the forecasts and to better predict the expected use of the HOV lanes on I-405 in 2020 in preparation for selecting a preferred alternative in the final EIS". – Will in fact this analysis be complete prior to final EIS issue and the selection of the Preferred Alternative?	Additional documentation of congestion pricing effects has been included in the FEIS in Section 3.12.
L49	TR	10	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	6. Preliminary results pending completed analysis were explained for calculating increased transit service hours, HCT alignment, additional freeway lanes (entire length was initially used); Alternative 4 express lanes access points, and HOT lanes also.	Your comment is acknowledged.
L49	O	6	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	7. Page S-14 Governor's Office - Blue Ribbon Commission Report is complete and was submitted to the Governor and Legislature.	Please see the revisions in response to your comment in the Summary Section of the Final EIS.
L49	TR	11	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	8. Page S-16 Timing – It should be added that additional HOV demand analysis, transit service levels analysis, HTC alignment, and traffic demand results from lane balancing refinement (see above) will be included into report prior to selecting a preferred alternative in the Final EIS.	Additional analysis of the Preferred Alternative is included in the FEIS in Section 3.12.4.6.

Code Number			Name	Comment	Response
L49	TR	12	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	9. Page S-40 Section 3.12 Transportation Impacts Alternative 1– "Alternative 1 could result in some reduction of peak-period single-occupant trips." Could a more specific percentage reduction be determined/documented as in the other Alternatives: "Under Alternative 2… peak period SOV trips would be reduced by 10% and 60% of high accident locations would improve" "… Alternative 3 could result in a reduction of peak-period single-occupant trips in the 10% range." And "… accident hot spots are reduced," "Alternative 4 would improve two-thirds of the high accident locations"	We have included some additional documentation of percentage reductions in Table S-2 of the Summary Section of the Final EIS.
L49	TR	13	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	10. Page S-41 Section 3.12 Transportation Impacts Alternative 2 – In the middle of the paragraph on environmental consequences, the statement that "HOV would remain the same" seems to contradict the other information presented in the paragraph. Therefore, the statement should be deleted.	This paragraph is clarified in Table S-2 of the FEIS.
L49	LU	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	11. Page S-43 Section 3.13 Land Use Impacts – Summary section indicates that land use impacts of the alternatives consists only of facility ROW requirements and displacements. There are a number of other indirect land use impacts that merit mentioning in this summary.	The Land Use section indicates that impacts include right-of-way and displacement impacts. There is further analysis of potential impacts to adjacent land uses in the Land Use analysis contained in the I-405 Corridor Program Draft Land Use Expertise Report and Section 3.23.3 of the FEIS.
L49	HAZ	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	12. Page S-51 Section 3.22 Hazardous Materials and Waste – note: All alternatives are given equal impact. Is that really so?	For evaluation of impacts at the programmatic level, a distinction was made between alternatives for construction impacts that are based on the estimated areas of construction. Further details of this evaluation are included in the I-405 Corridor Program Draft Hazardous Materials and Wastes Technical Memorandum. It is recognized in Section 3.22 of the I-405 Corridor Program Draft EIS that a more specific evaluation of the alternatives will need to be performed at the project-level analysis. Analysis of the operational impacts at the programmatic level did not identify substantial operational impacts based on a relative comparison for major elements of the alternatives. Again, a more specific evaluation of the alternatives will be performed at the project-level analysis.

Code Number			Name	Comment	Response
L49	TR	14	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	13. Page 1-2 1.2.1 Growth in Travel Demand- the population and employment figures, outside of 1970 and 1990 are not clear. I suggest a simple table could show information more clearly. Can 2000 data be documented in report?	Significantly more detail is provided in the I-405 Corridor Program Draft Transportation Expertise Report, revised August 2001.
L49	TR	15	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	14. Page 1-2 1.2.1.1 Travel Demand – This section would be enhanced by providing AM and PM peak hour(s) traffic volumes with an expanded graph.	See response to comment L49.TR-14. Information showing A.M./P.M. peak hour volumes is included the I-405 Corridor Program Transportation Expertise Report, Figures 3-8 to 3-11 on page 3-11.
L49	TR	16	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	15. Page 1-5 1.2.1.2 Mode Split – This section would be enhanced by providing AM and PM peak hour(s) mode split information.	Information for P.M. peak period is included in the Draft EIS and the Final EIS in Figure 3-12-1 and in the I-405 Corridor Program Draft Transportation Expertise Report in Figures 4-2 to 4-4.
L49	TR	17	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	16. Page 1-5 1.2.1.3 Trip Characteristics - This section would be enhanced by providing AM and PM peak hour(s) trip type information.	More Information is included the I-405 Corridor Program Draft Transportation Expertise Report on trip characteristics such as trip lengths and purposes.

Code Number			Name	Comment	Response
L49	TR	18	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	17. Page 1-8 1.2.2.3 Travel Time Reliability – last paragraph, 3rd sentence "HOV travel times *speeds* typically operate from 15 – 20 MPH faster… " Please correct.	This has been modified in the FEIS.
L49	TR	19	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	18. Page 1-8 1.2.3 Freight Mobility – Freight mobility, in terms of truck movement, could be better demonstrated with the graphical use of the State's Freight and Goods Transportation System (FGTS) within the Study Area for both state and local facilities. Air, rail and marine (if applicable) transport freight tonnage, major O/D info., and service frequencies should also be documented here. In a study of this magnitude, which considers two passenger Rail alternatives, it seems that the EIS document should provide additional information on freight rail usage, potential conflicts and planned/proposed improvements.	The Transportation Expertise report includes a working paper on freight usage. The freight rail usage is updated for each alternative in Sections 3.12.4.2; 3.12.4.3 3.12.4.4, 3.12.4.5 and 3.12.4.6 and in Section 1.2.3 of the FEIS.
L49	TR	20	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	19. Page 1-9 1.2.4 Safety – The accident data should be updated with more current records. High accident locations and corridors are specifically defined by WSDOT based on established criteria (High Accident Corridors [HAC] and High Accident Locations [HAL]).	The accident data were the most current available at the time of the analysis. Several state accident data were not available for more current years. Recently obtained I-405 freeway data for 2000 have been included in the FEIS (Section 1.2.4).
L49	TR	21	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	20. Appendix A – On Page A-11, Project R-51, should be shown as a Woodinville/Snohomish project. On Page A-15, in the listing of Pedestrian/Bicycle (I-405 Crossings), projects NM.CR-3 and NM.CR-4 are in Snohomish County (not King County.)	Thank you for your comment.

Code Number			Name	Comment	Response
L49	TR	22	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	21. Appendix B – At locations where a Transit Center as well as a Transit Station are proposed, where these facilities integrated physically and in the cost estimate?	Yes, several of these stations and centers were assumed to be integrated. Cost estimates for transit centers are included for the Preferred Alternative.
L49	COST	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	22. Page 2-15 General Cost Estimates and Schedule of the Action Alternatives - While it is clear that the cost estimates for capital projects and the TDM programs include the "initial public costs of providing the improvement."(pg 2-15) and no operational and maintenance costs ("Annual spending costs are not included in the TDM preliminary alternative cost estimates."(pg 2-15)). However, it is not clear if operational or maintenance costs are included in the High Capacity Transit or Bus Rapid Transit (BRT) costs. 23. -Since annual Maintenance and operation costs were estimated for cost-benefit analysis, these costs should be included, shown separately, in Table 2.2-2 to better inform decision-makers and the public.	Annual high-capacity transit and bus rapid transit maintenance and operation costs were not included in the preliminary alternative costs. Annual maintenance and operations costs were estimated for all of the program elements and were provided to participating agencies and decision makers on the I-405 committees. They are not specifically called out in the DEIS or FEIS as they are costs typically covered by ongoing program funds of participating agencies.
L49	COST	2	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	- BRT costs should be separated from the "… freeway HOV, transit services, and park-and-ride."(pg 2-15) costs estimates esp. since Table 2.2-2 and the project costs breakout in Appendix B only indicate the inclusion of BRT cost estimates in the Freeway HOV improvements section.	The existing HOV system will be used as the backbone of the BRT alignment. Projects that assure mobility for BRT will also improve flow for other transit, vanpools, and carpools. Therefore it is difficult to break out what portion of the HOV system will only be attributed to or benefit BRT. (Operations & Maintenance [O&M] costs are available.)
L49	AQ	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	24. Page 3.1-2 Air Quality Monitoring – Are there any PM2.5 monitoring stations within the study corridor? The text is not clear.	The Puget Sound Clean Air Agency now monitors PM2.5 in Kent and Lynnwood, which are near the edges of the study corridor.

Code Number			Name	Comment	Response
L49	TR	23	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	25. Page 3.4 –15 3.4.4.3 Alternative 2: Mixed Mode with HCT/Transit Emphasis – This section describes adding 4-5 new lanes on I-405 between NE 128 St. and NE 145 St. Is this a correct statement?	No. Between NE 128th and NE 145th one lane would be added each direction on I-405. The erosion data will be verified.
L49	WR	2	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	26. Page 3.5 – 1 3.5.1.1 Plans and Policies – Please consider adding dates of plans/policy adoption.	Dates have been added as requested.
L49	WET	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	27. Page 3.6 – 17 3.6.5.2 – Specific Mitigation – The text describing the estimates of acres of required wetland mitigation across alternatives is confusing and incomplete.	Section 3.6.5.2 has been revised to make it more clear and complete.
L49	WILD	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	28. Page 3.7 – 1 3.7.1 – correct the second paragraph: "… based on city and county comprehensive plans… "	"and county" has been added to the sentence.

Code Number			Name	Comment	Response
L49	WILD	2	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	29. Page 3.7 – 1 3.7.4.3 Construction Impacts – In order to facilitate quick refernce to the information in the table in the appendix, it would be helpful if both the name and the identification number of mentioned projects are quoted.	Listing all of the projects being referred to here would be cumbersome in the main text of the EIS and would not provide a benefit to the reader. Therefore, the impact section (Construction Impacts, Section 3.7.4.3.) was revised to better clarify which projects are being referred to and the appendix was cited for reference.
L49	TR	24	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	30. Appendix I – Transportation Data - The presentation of HOV use data does not give a very clear picture for allowing, especially a layperson, to compare meaningfully the different alternatives.	The HOV data are presented at the level of detail available to us as part of the programmatic analysis. Additional HOV analysis will be conducted during detailed project evaluations.
L49	TR	25	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	31. Page 3.12 – 18 – Criterion: Reduce the Peak period and Daily trips - There should be some additional discussion of the application of 3+ person HOV earlier. People are sure to be confused since the current HOV lanes allow two-person carpools.	HOV 3+ is explained as a regional policy by 2020 and is built into all the modeling work.
L49	TR	26	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	32. Page 3.12 – 19, 3.12 – 20 Tables 3.12-8, 3.12-9, 3.12-10 - The final report should include the results of the completion of TDM strategy effectiveness and incorporate into the tables. In addition, an a.m. and p.m. peak period version of Table 3.12-9 could provide a better indication of congestion reduction than the daily calculations. This may then lead to a modification of the Congestion Impacts text for the five alternatives to better inform the readers.	The TDM analysis was conducted outside of the regular travel modeling process. This was done, since the travel model is relatively insensitive to certain key TDM factors. We attempted to build the empirical TDM effects back into the model but were unable to obtain reliable results. Data for Table 3.12-9 are available for A.M., P.M., and off-peak periods and are provided in Appendix I in the Final EIS. The congestion analysis in Table 3.12-8 is, by definition, an assessment of the number of hours during the entire day that a facility is congested. We do not have this broken out by each peak period.

Code Number			Name	Comment	Response
L49	LU	2	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	1. There is no clear indication if the program will include the establishment of new freeway interchanges. Are new interchanges being considered for I-405 New interchanges have the potential to significantly affect commute and land use patterns.	There are new interchanges and direct access ramps proposed on I-405. Please refer to Appendix A - Major Elements of Alternatives.
L49	LU	3	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	2. The relationship of land use and transportation is not clear in either the Land Use or Transportation sections. It was not clear which alternative is considered to best fit the vision of the Metropolitan Transportation Plan (MTP), the long range plan adopted by the Puget Sound Regional Council to guide transportation investments in the Central Puget Sound region.	This has been corrected in the Final EIS, Section 3.13.
L49	CU	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	3. While excellent discussion of the alternatives relative to future effects on land use patterns is provided in the DEIS Cumulative Effects discussion, it is not clear which alternative is most consistent with the MTP. It appears from the text that Alternatives 2 and 3 have the best fit, and that Alternative 4 would be the least consistent. More discussion of consistency with the MTP would help to clarify which alternatives are most consistent with the MTP. It may also be useful to inform the reader with text in both the Land Use and Transportation sections that the effects of the alternatives on future land use are discussed in the Cumulative Effects section.	All of the alternatives are generally consistent with the MTP. With the spring 2002 refinement of *Destination 2030*, the Preferred Alternative was incorporated into the MTP. Additional comparisons of the alternatives are included in Section 3.23 of the FEIS.
L49	LU	4	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	4. With regard to the transportation/land use relationship identified above, would selection of either of the alternatives emphasizing high capacity transit tend to promote more intensive nodes of redevelopment near proposed transit stations? This potential effect seems to be only noted briefly in the text.	The analysis in the Draft EIS indicated that there would be higher densities in the Urban Centers. Ultimately, the redevelopment densities and type of land use near proposed transit stations can be anticipated to have higher densities, but will be dictated by the local jurisdiction's comprehensive plan and zoning designations.

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L49	ROW	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	1. The discussion of methodology to determine right-of-way acquisition needs does not identify the inclusion of mitigation needs or stormwater management as integral to the process. The EIS should note that right-of-way acquisition requirements can increase significantly, based on regulatory review that establishes project stormwater requirements and mitigation needs. Increased right-of-way needs will impact more parcels/property owners and greatly influence project cost's	It is acknowledged that additional land acquisition may be required as a result of mitigation needs, but whether such needs will occur will not be known until the project-level analyses are conducted. Costs of additional land acquisition are reflected in the estimates within the Final EIS. These estimates will be further addressed in the design stage. A discussion of mitigation for stormwater can be found in Section 3.5.
L49	ROW	2	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	2. Meeting these requirements will affect the area needed for acquisition, especially for alternatives that propose greater impacts to critical areas or that propose more impervious surface area. For example, Alternative 4 proposes significantly more impervious surface area and wetland impacts than the other alternatives, yet is estimated to have the second lowest right-of-way acquisition requirements.	Right-of-way acquisition requirements are estimated on a parcel-by-parcel basis. Specific impacts to wetlands and surface water are addressed in Sections 3.5, 3.6, and 3.8 and will be addressed in greater detail at the project level. Also see response to comment L49.ROW-1.
L49	SOC	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	1. The EIS identifies that substantial social impacts are judged to occur when there is a more than a moderate impact on community cohesion. This can occur when displacements, land use changes, and additional traffic create severe physical or implied separation between major neighborhood components. However, no discussion is provided that identifies to which degree the existing I-405 corridor contributed to creating such conditions in the existing baseline conditions.	Analysis and discussion of the degree to which I-405 contributed to existing conditions is not appropriate for this programmatic EIS. The baseline condition that the action alternatives are measured against is the No Action Alternative. The No Action Alternative analyzes future conditions in the corridor without the I-405 Corridor Program.
L49	ECON	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	2. This section briefly discusses "spatial interaction models" with regard to locational dynamics among and within the geographic subareas of the region. Because the financial investment into I-405 improvements can have a significant influence on the spatial pattern of regional growth, it would be useful to have some of this discussion in the land use chapter.	For detailed discussion on the model please see Appendix D of the Draft Land Use Expertise Report.

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L49	ECON	2	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	3. The discussion of pressures on Urban Growth Area boundary designations provided in the Regional Economic Development analysis on Page 3.16-5 should also be provided in the Land Use Section of the EIS. These pressures on UGA boundaries have direct bearing on whether Growth Management Act goals and objectives can be achieved with existing adopted plans.	The Final EIS Land Use Section (3.13) includes a general economic discussion, which is tied to the Economic Section (Chapter 3.16).
L49	HAZ	2	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	1. There is no discussion of impacts to existing residential septic systems and drainfields. Are impacts anticipated? If so, please note that these impacts will be addressed with subsequent project level risk assessments and environmental site assessments.	Presence of on-site residential septic systems may be addressed by environmental site assessments conducted for property or right-of-way acquisition. No substantial impacts are anticipated at this programmatic level.
L49	WR	3	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	1. Section 3.5.3.1 states that the Green River meets up with the Black River at the north end of the project. This is not true. That location is actually closer to the southern end of the project. The north end of the project is the Lynnwood area of Snohomish County.	The text has been revised.
L49	FATE	1	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	2. General comment with respect to sections 3.7 and 3.8 which discuss impacts to fish and wildlife: All alternatives evaluated have much greater potential to impact to fish and fish habitat than wildlife and wildlife habitat. The enormous increases in impervious surfaces (between 164 and 891 acres) will exacerbate peak flow and base flow issues in several subbasins where Chinook salmon and other salmonids are already at critical population levels. Further, disturbance and removal of riparian vegetation will also have huge impacts to aquatic resources. The few mitigation ideas proposed do not come close to offsetting these impacts.	WSDOT has worked closely with local jurisdictions to determine reasonable and feasible mitigation strategies. Please refer to the response to comment L38.FATE-1.

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L49	FATE	2	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	3. Section 3.8 Fish, Aquatic Habitat, and Threatened and Endangered Fish Species.Federal Regulations. Many presumed "individual" or "independent" projects within the I-405 Corridor Program may be considered linked by the federal agencies responsible for administering the ESA. Consultation on "individual", but obviously linked projects, especially within the same subbasin (e.g. North Creek), should be conducted and expected at the program level for each alternative considered.	The proposed near-term and early-action mitigation efforts by WSDOT during this environmental process serve to identify and mitigate potential cumulative impacts to each ESA species. This EIS process and issuance of the corresponding Record of Decision (ROD) is not an action that requires formal consultation under the ESA. However, FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for consultation on a programmatic level.
L49	FATE	3	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	4. I'm concerned that this DEIS does not adequately discuss the distribution, status, and habitat conditions of threatened, endangered, proposed, or candidate fish species to meet the objective of comparing the corridor program alternatives. In fact, none of the aforementioned information is contained in this draft of the EIS. This information is apparently available in the I-405 Corridor Program Draft Fish and Aquatic Habitat Expertise Report. However, none of this information is brought to bear as to how different alternatives, constructed in different subbasins, might effect these fish populations differently. The analysis conducted in section 3.8.4 is solely dependent upon the change(s) in impervious area and riparian encroachments expected under the different alternatives, but is without any respect to the existing habitat conditions and population characteristics, both of which are not uniformly distributed throughout the watersheds. This level of analysis is incompatible and inconsistent with local planning efforts being conducted at the WRIA level.	Additional data from the Fish and Aquatic Habitat Technical Expertise Report has been included in several sections of the Final EIS, but unfortunately, because of the nature of the EIS, all of the information could not be incorporated. EIS sections summarize or reference other documents to limit the size, and facilitate use and accessibility by the general public. Also, please see responses to comments L38.FATE-1 and L41.FATE-4.
L49	FATE	4	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	5. The reference to the Pacific Fishery Management Council is irrelevant.	The reference to Pacific Fishery Management Council is relevant because this council is involved in establishing Essential Fish Habitat.

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L49	FATE	5	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	6. State and Local Regulations. Local jurisdictions also have Stormwater management programs, laws, and design standards specifically to address water quality and instream habitat degradation. Shoreline master programs within these same jurisdictions also address habitat and water quality.	More detail on these issues can be found in Sections 3.5, Water Resources, and 3.11, Shorelines, of the Draft EIS.
L49	FATE	6	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	7. Methodology. The methodology section states that, "impact assessment included consideration of varying fish populations and habitat conditions among the various basins." Section 3.8.4 does not appear to assess impacts based on fish population or habitat conditions, but simply the amount of new impervious surface or stream crossings. Additionally, that "all area streams were included in the analysis regardless of fish presence" seems to belie this inconsistency. Given that the impacts from the Program alternatives will be distributed differently, it seems that impacts should be evaluated based on not only the level of impact (Total Impervious Area [TIA] and riparian encroachment), but the level of effect to the unevenly distributed threatened species, in particular. Again, information external to this DEIS is cited but not apparently incorporated into the analysis.	Evaluating and understanding the distribution of fish in the study area was beyond the level of analysis needed to assess impacts and to choose a Preferred Alternative. The assessment in the Draft EIS took into consideration a worst-case scenario: that all streams were capable of supporting fish and that no stream was more important than any other. In addition, the entire project area is designated as critical habitat for Puget Sound chinook. If the over 300 possible site-specific encroachments were analyzed during the programmatic phase, the conclusions could change during the project-level design. We understand the commentor's desire for this type of analysis; however, detailed distribution analysis will occur at the project level.
L49	FATE	7	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	8. Affected Environment. This section does not include adequate discussion of the many smaller tributary streams that will be disproportionately affected (in comparison to the Cedar River and Green River). The discussion of flow regulation in the Cedar and Green Rivers seems irrelevant.	More detail on major streams and their larger tributaries can be found in the draft Fish and Aquatic Habitat Expertise Report.
L49	FATE	8	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	9. 3.8.3.1 Fish Species Present. Kokanee are also present in North and Little Bear creeks (see WRIA 8 Salmon Recovery Planning fish distribution maps at http://dnr.metrokc.gov/Wrias/8/fish-maps/distmap.htm)	Section 3.8.3.1 of the Final EIS has been changed to note that kokanee are also present in North Creek and Little Bear Creek.

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L49	FATE	9	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	10. The figure included showing study area basins and fish migration barriers is not referenced in text, and it is unclear why migration barriers are depicted. Is this part of the mitigation section. Also, if mitigation may potentially include a subbasin level approach, why are only portions of subbasins included as part of the study area? This appears especially true for Bear Creek, upper Cedar River, Little Bear Creek, North Creek, and Swamp Creek.	Migration Barriers are discussed in detail in Section 3.8.3 of the Final EIS. Figure 3.8-1 is referenced in that section. Migration barriers are important in determining distribution of species and as potential points for mitigation. Subbasins are shown only within the Study Area boundaries because this is a transportation corridor study. Mitigation sites may extend beyond the study area; however, specific locations are unknown at this time and will be determined at project-level review or during the Early Action implementation. See responses to comments L34.FATE-65 and L38.FATE-1.
L49	FATE	10	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	11. More recent references could be provided for the predatory effects of warmwater species on juvenile salmonids.	Although updating references would be ideal, continually changing references would not be expected to alter the study findings.
L49	FATE	11	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	12. Table 3.8-1. Move Swamp Creek to the Cedar/Lake Washington Watershed.	The error in Table 3.8-1 has been corrected in the Final EIS.

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L49	FATE	12	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	13. Baseline Conditions of Basins. What are the habitat or watershed conditions used to indicate that Bear, Evans, Soos, and Coal creeks have the best available salmonid habitat? Why do the basins listed providing good habitat not include May Creek, Kelsey Creek or North Creek? Juanita Creek and Forbes Creek are highlighted as having good habitat, but are highly developed and provide little habitat for threatened species, especially relative to Little Bear, North, May, and Kelsey creeks, as well as the Cedar River within the Study Area. This appears to be a foundational paragraph in terms of depicting where good vs. poor habitat conditions exist, and where good vs. poor mitigation opportunities might exist. Yet, the information presented is highly inconsistent with local salmon recovery planning efforts. This is a critical paragraph in this chapter and the EIS as a whole. It should be revisited and expanded.	Information on habitat conditions throughout the study area was extracted from numerous basin plans, studies, and publications as referenced in the Draft Fish and Aquatic Habitat Expertise Report.
L49	FATE	13	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	14. Impacts. Potential direct and operational impacts should not be limited to impervious area created but should also include the action area in total, where clearing and grading for staging, storage, operations, maintenance, and runoff treatment would occur - areas where vegetation and topsoil would be removed and compaction would occur. It should be noted that riparian encroachments are also floodplain encroachments and would act to limit any future natural channel adjustment, thalweg position, or longitudinal profile, especially where any bank stabilization measures were included as part of construction.	The riparian clearing and other construction-related impacts are important, but are not predictable at this programmatic level for numerous projects that have not yet been designed. The ‘riparian encroachments”measure is intended to sufficiently represent the relative potential construction impacts between alternatives. Riparian clearing and other construction-related impacts will be addressed at the project level.
L49	FATE	14	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	15. It is stated that the No Action Alternative is the baseline as these are committed projects. It is unclear as to whether these same No Action Alternative projects would also be conducted if any of the Program alternatives were selected. If the projects under the No Action Alternative will be implemented with each Action Alternative, then the total represented for each alternative should also incorporate the No Action Alternative totals. Otherwise in Table 3.8-3 it appears no new impervious area would be created in Evans Creek under Alternative 1, when in fact the No Action Alternative projects (comprising 9 acres of TIA) include new TIA.	The No Action Alternative projects are expected to proceed regardless of the decision reached through the I-405 Corridor Program. The analysis of each alternative includes the effects of the No Action Alternative. Tables have been changed to include the No Action numbers. In the Draft EIS, they were noted in a footnote.

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L49	FATE	15	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	16. The impact assessment provided for the different alternatives seems inadequate as the alternatives are simply weighed against one another and the relative direct impacts to habitat or fish populations as they are distributed among the differentially affected subbasins is only scarcely evaluated. The analysis indicated which subbasins might have the most significant impacts, but what does this mean? Are we to assume that for fish and habitat the impacts are interchangeable among subbasins?	Please refer to Section 5 of the Draft Fish and Aquatic Habitat Expertise Report for a more detailed impact analysis.
L49	FATE	16	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	17. The impacts analysis in the Section 3.8.4 should include isolated wetland fills in an analysis of impacts on fish habitat. Riparian encroachments are not the only wetland encroachments affecting fisheries habitat.	Isolated wetland fills are not likely to be as significant in altering hydrology as new impervious surface or riparian disturbance, and so are not as useful in comparing alternatives at this programmatic level of analysis. During the project-level design and environmental review, isolated fill areas will be more important.
L49	FATE	17	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	18. Mitigation Measures. Mitigation should be provided by compensating for not only lost habitat functions but also the area impacted which would be required to naturally support those functions. Functional equivalency alone, without incorporation of area impacted, is an inadequate goal for mitigation.	See response to comment L38.FATE-1.
L49	FATE	18	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	19. I-405 Corridor Program Alternatives will facilitate growth and development and these will be indirect effects that contribute to long-term cumulative effects. On-site/in kind mitigation must address all impacts from new impervious surfaces, but direct loss of habitat quality and indirect and cumulative effects will likely only be adequately addressed through off-site/out-of-kind mitigation.	Cumulative impacts to ESA species are addressed in Section 3.23 of the Draft and Final EIS. The cumulative impact assessment is based largely on the 2001 updated Metropolitan Transportation Plan and the Puget Sound Regional Council 20-year modeling projections of population and employment. The proposed near-term and early-action mitigation efforts by WSDOT during this environmental process serve to identify and mitigate potential cumulative impacts to each ESA species. This EIS process and issuance of the corresponding Record of Decision (ROD) is not an action that requires formal consultation under the ESA. However, FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for consultation on a programmatic level.

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L49	FATE	19	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	20. This kind of mitigation could serve to protect high-quality habitats, but an equal emphasis on restoration of degraded habitats should also be recognized. Protection of high quality habitat that is already properly functioning still does not mitigate for habitat impacts, nor does it "improve" conditions at the subbasin scale. At the subbasin or watershed scale (>10 km2), effective aquatic habitat protection will not occur via land acquisition-it can only occur by proper land use planning and effective enforcement of critical areas, shoreline, land use and Stormwater regulations. Therefore, strong consideration must be given to off-site/out-of-kind projects that act to protect or restore those watershed processes that maintain high quality riparian and aquatic habitats and water quality. These may be on lands that are currently not protected by any critical areas, shorelines, or Stormwater regulations. Of course, degraded aquatic and riparian habitats, which otherwise would never recover to provide functioning habitats could also be acquired (even through condemnation) with the aim of removing stressors that exist and restoring riparian and floodplain processes first, and instream habitat complexity secondarily.	See response to comment L38.FATE-1.
L49	FATE	20	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	21. This subbasin approach also allows for flexibility to address, via off-site/out-of-kind mitigation, those habitat factors that are known to limit salmonid production within individual subbasins. This approach would be highly compatible with the WRIA Salmon Recovery Planning process that will identify strategies (which may vary by subbasin) to recover habitat, by addressing habitat-limiting factors.	See response to comment L38.FATE-1.
L49	FATE	21	Johannes W. Kurz 2930 Wetmore Avenue, Everett, WA 98201-4044 Hans.Kurz@co.snohomish.wa.us Agency: Snohomish County Public Works	22. 3.8.5.1 On-Site/In-Kind Mitigation. Construction Impact Mitigation - are the BMPs suggested taken from any specific source? WDOE Stormwater manual? ODOT road maintenance 4d rule BMPs? Please reference as appropriate.	The suggested BMPs reflect those typically included by WDFW as conditions for Hydraulic Project Approval.

Code Number			Name	Comment	Response
L50	O	1	John M. Healy 1000 Friends of Washington / Sensible Solutions for 405 PO Box 131,Seattle, WA 98111-0131 See also signature sheet	Enclosed, please find the comments of the "Sensible Solutions for 405" coalition regarding the Draft Environmental Impact Statement for the I-405 Corridor program, published in August, 2001, and submitted in accordance with 42 U.S.C. § 4332 (2) (c) and 49 U.S.C. § 303; SEPA RCW 43.21C; and WAC 197-11 and WAC 468-12. The Sensible Solutions Coalition ("the Coalition") is made up of some 1,500 residents of the Eastside corridor through which I-405 passes as well as the following member organizations: 1000 Friends of Washington, Transportation Choices Coalition, National Wildlife Federation, Livable Communities Coalition, REP America (Washington Chapter), Washington Conservation Voters, Washington Public Interest Research Group, Sierra Club (Cascade Chapter), and East Lake Washington Audubon Society. Sensible Solutions would like to thank the Washington State Department of Transportation ("WSDOT") for its efforts in preparing the DEIS and for the many meetings and conversations in which the Coalition has been encouraged to raise its concerns. The comments contained in this submittal are made with all due respect to the hard work of the many committee members, agency staff members and consultants working on the I-405 Corridor Program. We trust that this positive working relationship will continue as the process evolves.	Thank you for your comment.
L50	O	2	John M. Healy 1000 Friends of Washington / Sensible Solutions for 405 PO Box 131,Seattle, WA 98111-0131 See also signature sheet	The Coalition's review of the I-405 DEIS and participation in the process so far have convinced us that problems exist both with the legal adequacy of the DEIS as well as the value of WSDOT's documented preference for dramatic highway expansion. Long before the DEIS was finalized, WSDOT announced its intent to proceed with a Preliminary Preferred Alternative ("PPA") involving two new general-purpose lanes in each direction throughout the entire range of I-405. The Coalition believes that such an alternative moves Puget Sound's regional transportation planning in the wrong direction, for the following reasons.	In January 2001, the Executive Committee for the I-405 Corridor Program recommended a preliminary preferred alternative that represented the committee's then current thinking on the direction of the program. The preliminary preferred alternative was a non-binding polling of the committee based on information provided in the available expertise reports and preliminary feedback from the Steering Committee and Citizens Committee. No decision was made by the co-lead agencies to implement any alternative. The meaning of your statement that WSDOT announced intent to proceed with the preliminary preferred alternative is not clear. The preliminary preferred alternative was not sufficiently developed, evaluated, or cleared environmentally for WSDOT to formulate or affirm intent to implement it at that time.

Code Number			Name	Comment	Response
L50	COST	1	John M. Healy 1000 Friends of Washington / Sensible Solutions for 405 PO Box 131,Seattle, WA 98111-0131 See also signature sheet	· The PPA is fiscally unsound: it is estimated to cost more than $7 billion, before overruns. It is an unreasonable sum to expect from taxpayers simultaneously faced with staggering bills from proposed projects on the SR-99 Alaskan Way Viaduct and the Trans-Lake program across Lake Washington.	The Preferred Alternative that emerges from the I-405 Corridor Program will identify nearly 150 multimodal projects and actions that will reduce traffic congestion and improve mobility for people and goods within the region over the next 20 years. Federal, state, regional, and local agencies, with public support, will be tasked with funding the proposed regional corridor projects. Corridor programs of similar magnitude and potential benefits are being funded and constructed elsewhere in the region and United States. For example, voters in the Puget Sound region approved funding for Sound Move, Sound Transit's 10-year $4 billion program to improve transit. Some of these Sound Transit revenues may fund transit projects identified within the I-405 Corridor Program. At the present time, approximately $2 billion in public funds are spent on transportation each year within the Puget Sound Region. Current funding levels have been unable to keep up with increased demand for transportation services.
L50	TR	1	John M. Healy 1000 Friends of Washington / Sensible Solutions for 405 PO Box 131,Seattle, WA 98111-0131 See also signature sheet	· The PPA, with its heavy emphasis on new general-purpose capacity, is unlikely to prove effective at increasing accessibility to the transportation system or significantly reducing congestion. Real world examples and much credible scholarship suggest that new capacity will only become congested again shortly after completion. And that is to say nothing of the congestion and pollution that come with a 15- to 20-year construction project. The DEIS itself projects that I-405 will labor under more than 5 hours of congestion daily at the completion of the PPA.	Refer to response to comment E66.SOL-1.
L50	LU	1	John M. Healy 1000 Friends of Washington / Sensible Solutions for 405 PO Box 131,Seattle, WA 98111-0131 See also signature sheet	· In study after study, and in case after case, it has been shown that highway expansion encourages sprawl-type development. Sprawl is bad for kids and the elderly because it harms air quality. It is bad for communities because it isolates people. It burdens taxpayers with infrastructure costs and it hurts fish and wildlife as wild and rural lands are turned into parking lots and shopping malls.	Please refer to responses to comments L27.LU-19 and E66.SOL-1.

Code Number			Name	Comment	Response
L50	WILD	1	John M. Healy 1000 Friends of Washington / Sensible Solutions for 405 PO Box 131,Seattle, WA 98111-0131 See also signature sheet	· Significant highway expansion will seriously harm our region's threatened salmon populations at the very time that so many people, communities, and businesses are making sacrifices and undertaking efforts to restore these imperiled species.	Impacts and possible mitigation measures to threatened and endangered fish species are identified in Section 3.8. The co-lead agencies are concerned for the threatened salmonids and will take every precaution to avoid harm while proceeding with regional transportation requirements.
L50	O	3	John M. Healy 1000 Friends of Washington / Sensible Solutions for 405 PO Box 131,Seattle, WA 98111-0131 See also signature sheet	The Coalition also believes that WSDOT's procedures, and the DEIS itself, do not meet legal standards. For example, the Coalition believes that WSDOT is likely in violation of the federal Endangered Species Act ("ESA") for failing to initiate consultation with the National Marine Fisheries Service regarding the impacts of this project to ESA-listed Puget Sound Chinook salmon. The DEIS itself is legally inadequate under NEPA for a number of reasons. It fails to provide adequate detail on the alternatives and their impacts by deferring detailed consideration until after an alternative is selected, precisely what NEPA is intended to avoid. Moreover, it fails to properly evaluate a number of critically important impacts, such as the relationship between highway-expansion alternatives and increased pressures for sprawl. If not properly addressed, these issues may ultimately have to be resolved in the courts.	Issuance of the I-405 Corridor Program Final EIS and Record of Decision do not constitute an action or an irreversible or irretrievable commitment of resources requiring consultation under ESA with the National Marine Fisheries Service (NMFS) or U.S. Fish and Wildlife Service (USFWS). Nonetheless, WSDOT is coordinating with these two agencies regarding initiation of early consultation under ESA. Also, the decision to be made through the I-405 Corridor Program is to determine the best mix of modal solutions, transportation investments, and demand management to improve movement of people and goods throughout the I-405 corridor, reduce foreseeable traffic congestion, and satisfy the overall purpose and need. Please refer to page S-1 of the I-405 Corridor Program Draft EIS. The analyses and documentation prepared for this EIS are adequate and appropriate to support this corridor-level decision. As discussed on page S-2 of the Draft EIS, subsequent NEPA and SEPA environmental analysis, documentation, and review will be prepared to enable decisions regarding site-specific, project-level details on alignments, high-capacity transit technology, project impacts, and mitigation measures. It is not necessary or practical to develop project-level information on specific project design details or precise footprints at this corridor level of decision-making.

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L50	SOL	1	John M. Healy 1000 Friends of Washington / Sensible Solutions for 405 PO Box 131,Seattle, WA 98111-0131 See also signature sheet	On a more positive note, the Coalition believes that sensible alternatives exist and the problems identified in these comments can be rectified without undue delay to the program. Specifically, included in these comments is the Coalition's independent transportation and development vision for the I-405 corridor, a vision that has come to be known as "Alternative 5." Alternative 5 is a cost-effective and fiscally sound approach that: · Provides highway improvements where they are most needed. · Promotes a range of transportation choices such as bus, high-capacity transit, demand-management and trip reduction strategies. · Provides incentives for new residential and employment development in existing urban centers that are served by transit, which prevents sprawl. · Protects Puget Sounds' streams, wetlands and salmon. · Promotes compact, walkable communities in the spirit of Washington's Growth Management Act. The more detailed comments attached to this letter provide a full explanation of the problems the Coalition believe should be addressed as well as a comprehensive overview of Alternative 5. The following documents are included in this package: 1) National Wildlife Federation's comments regarding legal concerns arising under NEPA and ESA; 2) the comments of tranportation expert Leon Skiles of Leon Skiles and Associatates, Inc., on the flaws in the DEIS with regards to transportation and land use impacts, as well as the description of Alternative 5; 3) the comments of fisheries biologists Steward and Associates regarding the impacts to salmon and fish habitat associated with this project; and 4) the comments of Dr. Bob Johnston, University of California at Davis professor of environmental science and policy, regarding the travel demand and emissions modeling and land use impacts components of the DEIS.	The specific comments of the National Wildlife Federation, Leon Skiles, Steward and Associates, and Dr. Johnston are addressed subsequently within this section. The I-405 Corridor Program will initiate preparation of a biological assessment and consultation with the necessary federal agencies in compliance with ESA at the appropriate time. Please also refer to the response to your comment L50.O-3 regarding the timing of ESA compliance. The Final EIS has been revised to reflect updated information and necessary corrections. The models used were the best available at the time the analyses were conducted, and they do not require revision; please refer to the responses to comments L19.TR-3, L35.TR-1, and L53.TR-2. There is no Alternative 5 in the I-405 Corridor Program Draft EIS. A comparative examination of the Sensible Solutions proposal is provided in the response to comment E66.SOL-1.

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				As should be evident, the Coalition is taking this matter very seriously and is committing extensive resources toward development of a solution in the I-405 corridor that works for everyone. The Coalition is asking the staff and Executive Committee of the I-405 Corridor Program to take the following actions: 1) Begin preparation of a biological assessment under the ESA and, at the appropriate time, initiate formal consultation with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service on the impacts of the project to threatened and endangered fish species. 2) Revise the EIS and its underlying models to address the flaws in terms of adequate detail, analysis of indirect impacts, and mitigation. 3) Include in the Final EIS a full and fair evaluation of the Coalition's independent alternative, sometimes known as Alternative 5, included herein.	
L51	O	1	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	Nonetheless, the Coalition believes that WSDOT's efforts to date to develop an alternative that complies with the law and sound public policy have been unsatisfactory. It is evident to us that WSDOT selected– and intends to move ahead with– a preferred course of action involving maximum highway construction, before the impacts of such a course have been fully disclosed and analyzed as required by state and federal law. While WSDOT's efforts to meet with and to involve the Coalition have been welcome and appreciated, we feel that WSDOT is inextricably committed to the road-expansion alternative announced early in the process, an alternative that the Coalition feels is as unlawful as it is unwise.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. All alternatives are under consideration. Also, it is important to note that the preliminary preferred alternative was recommended by the I-405 Corridor Program Executive Committee. The preliminary preferred alternative represented the committee's then current thinking on the direction of the program. It was the result of a non-binding polling of the Executive Committee based on information provided in the available expertise reports and preliminary feedback from the Steering Committee and Citizens Committee. It is not accurate to attribute the preliminary preferred alternative solely to WSDOT. Chapter 2 of the I-405 Corridor Program Final EIS discusses each of the alternatives, the improvements and modal elements that are contained in each, and the reason for advancing the Preferred Alternative. The response to comment L6.ALT-1 discusses the preliminary preferred alternative in comparison to Alternative 3 - Mixed Mode Emphasis. The alternative with the greatest amount of highway construction is Alternative 4 - General Capacity Emphasis. It is not clear from your comment what potential legal problems you believe exist with this or other Draft EIS alternatives. Absent identification of specific potential problems, it is not possible to respond further.

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L51	O	2	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	The fundamental purposes of NEPA are to guarantee that: (1) federal agencies take a "hard look" at the consequences of their actions before the actions occur by ensuring "that the agency, in reaching its decision, will have available, and will carefully consider, detailed information concerning significant environmental impacts," and (2) "the relevant information will be made available to the larger audience that may also play a role in both the decision-making process and the implementation of that decision." Robertson v. Methow Valley Citizens Council, 490 U.S. 332, 349 (1989); 40 C.F.R. § 1502.1 (EIS "shall" inform decision makers and the public of reasonable alternatives and environmental impacts); see also Marsh v. ONRC, 490 U.S. 360, 369 (1989) ("NEPA promotes its sweeping commitment to 'prevent or eliminate damage to the environment and biosphere' by focusing Government and public attention on the environmental effects of proposed agency action.") In short, NEPA requires federal agencies to look before they leap. To satisfy the requirement that it take a "hard look" at the environmental consequences of its actions, an agency must engage in a "reasoned evaluation of the relevant factors" to ensure that its ultimate decision is truly informed. Greenpeace Action v. Franklin, 14 F.3d 1324, 1332 (9th Cir. 1992). The DEIS must be searching, detailed and comprehensive. "General statements about 'possible' effects and 'some risk,' do not constitute a 'hard look' absent a justification for why more definitive information could not be provided." Neighbors of Cuddy Mountain v. United States Forest Service, 137 F.3d 1372, 1380 (9th Cir. 1998); Minnesota Public Interest Research Group v. Butz, 541 F.2d 1292 (8th Cir. 1976) (EIS must not be so vague, general and conclusory that it cannot form basis for reasonable evaluation and criticism); Citizens Against Toxic Sprays v. Bergland, 428 F. Supp. 908, 922 (D. Or. 1977)	The I-405 Corridor Program achieves the goals and requirements of NEPA through the corridor-level EIS and the Reinventing NEPA process. The decision to be made through the I-405 Corridor Program is to determine the best mix of modal solutions, transportation investments, and demand management to improve movement of people and goods throughout the I-405 corridor, reduce foreseeable traffic congestion, and satisfy the overall purpose and need. Please refer to page S-1 of the I-405 Corridor Program Draft EIS. It is not necessary or practical to develop project-level information on specific project design details or precise footprints at this corridor level. As discussed on page S-2 of the Draft EIS, subsequent NEPA and SEPA environmental analysis, documentation, and review will be prepared to enable decisions regarding site-specific, project-level details on alignments, high-capacity transit technology, project impacts, and mitigation measures. Please refer to Chapter 2, Appendix A, and Appendix B of the I-405 Corridor Program Draft EIS for a description of the action alternatives and the improvements that are contained in each. The alternatives are developed and described in more than enough detail to adequately evaluate and determine their potential to meet the purpose and need, and to assess their potential for significant adverse effects to remain after mitigation. Absent identification of specific potential legal problems, it is not possible to respond further.

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				("Conclusory statements which do not refer to scientific or objective data supporting them do not satisfy NEPA's requirement for a 'detailed' statement.") An agency's failure to include and analyze detailed information that is important, significant, or essential renders an EIS inadequate. Without such detail, there is no way for the public or the agency to adequately assess the impacts of a proposed action. In Coalition for Canyon Preservation v. Bowers, for example, the Ninth Circuit invalidated an EIS for a highway expansion project like this one because the document failed to include adequate detail on various environmental impacts. 623 F.2d 774, 782 (9th Cir. 1980) ("We conclude that the EIS fails to give decision-makers who are removed from the initial decision sufficient data from which to draw their own conclusions about air, noise, and water pollution."); see also California v. Bergland, 483 F. Supp. 465, 495 (E.D. Cal. 1980), aff'd sub nom, California v. Block, 690 F.2d 753 (9th Cir. 1982) (by failing to disclose key data, "the Forest Service effectively undercut the twin goals of environmental statements: informed decision-making, and full disclosure"); Brooks v. Volpe, 380 F. Supp. 1287 (W.D. Wa. 1974) (EIS must include "abundant detail" in treating environmental considerations). The Coalition believes that the DEIS fails to fulfill NEPA's mandate of providing detailed and comprehensive information on the alternatives and their impacts. WSDOT may not, as it has done throughout this DEIS, ignore relevant information and rely upon conclusory statements and unsupported assertions to satisfy NEPA's "hard look" requirement. We believe that these deficiencies present an inaccurate picture of the impacts to the public, making it impossible for anyone, including state and federal agencies with a mandate to ensure projects do not harm imperiled wildlife, to draw any reasoned conclusions about the environmental impacts of the alternatives presented in this DEIS. Indeed, given the lack of detail in the DEIS, it remains unclear what the alternatives even are, let alone what impacts each might present.	

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L51	O	3	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	A critical flaw in WSDOT's NEPA compliance is WSDOT's plan to postpone full consideration of the impacts of the various alternatives until later in the process. See DEIS Fact Sheet, pg. a. The current DEIS looks at the general impacts of various alternatives for the entire 30-mile I-405 corridor, on a broad and largely abstract level. Id. at S-2 (EIS "does not focus on specific design details or precise footprints"); 3.8-14 ("The I-405 Corridor Program alternatives presently identify projects only at a conceptual level; no detailed project design has been completed.") As discussed below and more extensively in the expert comments provided by the Coalition, the DEIS fails to include detailed data and analysis regarding the impacts to fish and wildlife associated with the various alternatives, or even details about what is actually involved in each alternative. See, e.g., id. at 3.13-4 ("[U]ntil the project-level design and environmental analysis, documentation, and review are accomplished, the specific direct [land use] impacts cannot be known.") (emphasis added). The DEIS and other documents indicate that a more detailed description of the chosen alternative, and closer and more detailed analysis of impacts, will be provided at a later date, most likely during project-level NEPA/SEPA evaluation. This is unacceptable and inconsistent with NEPA. The purpose of NEPA is to disclose fully impacts before deciding upon a course of action. Connor v. Burford, 848 F.2d 1441, 1450 (9th Cir. 1988). In Connor, the Ninth Circuit rejected an agency's position that inadequate information prevented it from describing in an EIS all of the anticipated future effects of a planned project. The government's inability to fully ascertain the precise extent of mineral leasing in a national forest is not, however, a justification for failing to estimate what those effects might be before irrevocably committing to the activity. . . . Appellants' suggestion that we approve now and ask questions later is precisely the type of environmentally blind decision-making NEPA was designed to avoid.	The I-405 Corridor Program is a national pilot study for the "Transportation Decision Making Process Improvement." This approach moves NEPA decision-making to the early stages of long-range planning for transportation projects. As a result, it is expected to provide a longer window within which to resolve environmental issues, the potential for a greater range of environmental solutions, and improved certainty that decisions will not have to be revisited later during project development and permitting. The I-405 Corridor Program fully discloses and considers the potential impacts of the alternatives commensurate with the decision that is at hand. Please refer to the response to your comment L51.O-2. This programmatic level of detail and analysis is consistent with requirements of 40 CFR 1502.20. Furthermore, as stated on page S–2 of the I-405 Corridor Program Draft EIS, "this programmatic analysis is appropriate and necessary at this early stage in the transportation planning and decision-making process, when many project-level design details are not meaningful in evaluating effects on mobility, transportation performance, and environmental quality across such a large area." As you recognize, follow-on NEPA and SEPA environmental analysis, documentation, and review will be prepared to enable decisions regarding site-specific, project-level details on alignments, high-capacity transit technology, project impacts, and mitigation measures. This project-level environmental compliance is expected to be necessary in most cases for permit approvals; it is in no way redundant, in purpose or level of content, with this programmatic Draft EIS. Adoption of a programmatic course of action for the I-405 Corridor Program is not irreversible. This is recognized in the Draft EIS on page S –2 where it is stated that, "subsequent NEPA and SEPA environmental analysis, documentation, and review will enable decisions regarding site-specific, project-level detail on alignments,

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				Id. at 1450-51; see also Kleppe v. Sierra Club, 427 U.S. 390, 410 (1976) ("Only through comprehensive consideration of pending proposals can the agency evaluate different courses of action.") (emphasis added); Cuddy Mountain, 137 F.3d at 1380 ("Nor is it appropriate to defer consideration of cumulative impacts to a future date.") In Oregon Environmental Council v. Kunzman, 714 F.2d 901, 904-05 (9th Cir. 1983), the Ninth Circuit rejected an agency's effort to proceed with an agency action on the basis of a general "programmatic" EIS. The court noted that the programmatic EIS, and accompanying environmental assessment for the project "did not provide the information necessary reasonably to enable the decision-maker to consider the environmental factors and to make a reasoned decision." Id. These cases are very much analogous to the situation here. By selecting a preferred alternative from among those included in the DEIS, WSDOT will be committing to a course of action that has impacts that are both irreversible and unexamined. For example, project level NEPA analysis may disclose – for the first time – that several of the projects required to complete a corridor-wide alternative have serious and/or unavoidable impacts to aquatic resources or other environmental values, impacts that could have been avoided by choosing an alternative that involved less road construction. See DEIS S-9 ("serious and substantial" adverse impacts will be "analyzed at a later time during project-level environmental analysis"). By the time such impacts have been disclosed, however, the opportunity to make such broad-scale decisions will have long past: by deciding upon a primarily road-building oriented alternative, WSDOT will no longer have the opportunity to move to a more transit oriented alternative later in the process. See Skiles Report, § 2.3.3 (promoting highway-based transportation makes it even more difficult to establish transit mode share later on). Accordingly, we believe that WSDOT is prohibited by law from postponing comprehensive and detailed consideration of each alternative's impacts until site-specific NEPA evaluation.	high-capacity transit technology, project impacts, costs, and mitigation." Based in part upon your concerns, as well as comments expressed by Skiles, the U.S. Environmental Protection Agency, and others regarding (1) need for flexibility in the implementation of alternatives in response to changing conditions and needs, and (2) the substantial role that high-capacity transit should play within the corridor, the Executive Committee recommended a Preferred Alternative with a multimodal focus and less aggressive addition of highway lanes that was subsequently advanced to the Final EIS by the co-lead agencies. The Preferred Alternative would implement a high-capacity transit system throughout the study area using bus rapid transit (BRT) and include up to a 70 percent increase in transit service. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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				While the Coalition recognizes that so-called "programmatic" NEPA review is not uncommon in other contexts, critical differences exist in this situation. In the forest planning context, for example, land management agencies often perform NEPA evaluation at the forest plan level as well as the project level. If NEPA review for an individual project discloses serious adverse impacts, it can readily be modified or eliminated without meaningful impacts to the general direction provided in the forest plan. Here, however, selection of one of the corridor-wide alternatives forecloses other options. Once a corridor-wide alternative is selected, project-specific NEPA review is largely redundant as far as the public is concerned: it will be very unlikely that individual projects can be eliminated or substantially modified without jeopardizing the corridor-wide strategy as a whole. Disclosure of significant adverse impacts at the project scale will not lead to selection of a different corridor-wide strategy, for example one based on major investments in transit and urban density. As such, the selection of an alternative now will shape the direction of the region's transportation policy for decades, and hence, that selection must be on the basis of complete information. Certainly, nothing in NEPA allows WSDOT to defer consideration of these critical issues until after a corridor-wide alternative has been selected. Accordingly, we ask that WSDOT provide a full and fair evaluation of each alternative and their impacts prior to choosing one alternative for implementation.	
L51	O	4	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	The problem arises again from the "front-loaded" nature of the planning process. NMFS, FWS and other federal and state resource agencies are being asked to "sign off" on very broad scale decisions with long-lasting impacts in the absence of complete information on both planned activities and potential impacts. WSDOT appears to take the position that by participating in the Reinventing NEPA process, resource agencies give up their ability to raise (and have addressed) significant concerns later, if and when concerns arise. This is contrary to law as well as intelligent planning. As the Coalition has pointed out repeatedly, there is inadequate detail now (and during prior stages) regarding WSDOT's plans and their impacts. While there is nothing inherently wrong in asking resource agencies to participate in plan development, preventing them from raising concerns later on as more facts become known is unlawful and unwise. Any effort by WSDOT to prevent the resource agencies from exercising their	Resource agencies, by participating in the Reinventing NEPA process, do not give up their responsibility and ability to raise and have addressed their significant concerns at later stages in the process. As discussed in Section 6.1 of the I-405 Corridor Program Draft EIS, concurrence has been consistently explained to mean that program information is adequate for the current phase of the process. An agency with jurisdiction agrees only not to revisit its previous concurrence unless there is substantial new information, or substantial changes have been made to the proposal, the environment, or laws and regulations. Concurrence does not mean that a permit necessarily will be issued upon satisfactory completion of the EIS. At no time has WSDOT or the co-lead agencies identified that subsequent analyses would be any more or less difficult than those being conducted for this Draft EIS. Further, early review under the Reinventing NEPA process does not ensure that reviews will be

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				obligations under statutes such as the Endangered Species Act or Clean Water Act, based on their participation in the Reinventing NEPA process, would be unlawful. Moreover, there is a fundamental tension between the goals of "Reinventing NEPA" and the "programmatic" strategy WSDOT appears to be following. Reinventing NEPA purports to plan efficiently by considering environmental impacts early in the process. As the DEIS repeatedly acknowledges, however, WSDOT is postponing the difficult but very necessary environmental analyses until after an alternative has been selected. Thus, the Coalition feels that "Reinventing NEPA" as currently constituted offers WSDOT all of the advantages of speedy review, but fails to satisfy the public's need for adequate and timely information prior to selecting an alternative. While the Coalition supports efforts by WSDOT and others to involve other agencies in planning, we cannot abide by WSDOT's evident direction towards selection of a corridor-wide alternative in the absence of adequate public information and participation, and without full and adequate analysis by wildlife agencies.	speedy or timely. In order to provide the agencies with jurisdiction additional time to consider the Preferred Alternative and mitigation program, and to further ensure that it is an effective and responsible choice, the request for concurrence on the Preferred Alternative and mitigation concept was delayed approximately four months until evaluation of the effects of the Preferred Alternative was complete and the mitigation concept and commitments were in place. Also, please refer to the responses to your comments L51.O-2 and L51.O-3 regarding the decision to be made, level of analysis, and adequacy of information. The co-lead agencies have no control over the completeness and adequacy of reviews by wildlife or other resource agencies. The I-405 Corridor Program provided for public notice, information, and participation in the Draft EIS process and public hearings using a much more extensive approach than is required or is typically employed for other NEPA and SEPA EISs. Please refer to Section 6.2 and Section 7 of the I-405 Corridor Program Draft EIS, as well as to the response to comment E46.O-1 for a detailed discussion of public involvement and public notice during the Draft EIS process.
L51	O	5	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	NEPA requires an EIS to evaluate indirect effects, such as the extent to which the project will induce changes in land use. 40 C.F.R. § 1502.16; 1508.8(b). CEQ regulations define "indirect effects" as follows: Indirect effects . . . are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced change in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems. Id. § 1508.8. Clearly, indirect effects are often a critical consideration in highway construction cases, where expansion of highway facilities typically triggers increased development in new areas. In City of Davis v. Coleman, for example, the Ninth Circuit flatly rejected an agency's attempt to dismiss the environmental impacts of induced development associated with a proposed freeway project. 521 F.2d 661, 675 (9th Cir. 1975) ("We think that this	The discussion in Section 3.23 of the I-405 Corridor Program Draft EIS does not distinguish between indirect effects and cumulative effects; instead, both indirect and cumulative effects are referred to generally as cumulative effects. The section does include a rigorous analysis and discussion of indirect effects, as defined by the CEQ, for the I-405 Corridor Program alternatives. This disclosure of impacts was deemed more important than the distinction between indirect and cumulative effects. The EIS language that you identify on pages S-15, S-16, and 3-1 is in error and has been corrected in the Final EIS. The basis for the statement you reference on page 3.7-8 is that land use is directed according to the adopted local land use plans. The relationship between land use, transportation, development, and the comprehensive planning process is discussed in detail in the I-405 Corridor Program Draft EIS Sections 3.12 Transportation, 3.13 Land Use, and 3.23 Cumulative Effects. See especially Section 3.13.2

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				is precisely the kind of situation Congress had in mind when it enacted NEPA: substantial questions have been raised about the environmental consequences of federal action, and the responsible agencies should not be allowed to proceed with the proposed action in ignorance of what those consequences will be."); see also Coalition for Canyon Preservation, 632 F.2d at 783 (EIS invalid for failing to describe land use impacts caused by highway expansion). In fact, the Ninth Circuit has specifically noted in the highway context that "secondary or induced effects may be more significant than the project's primary effects." Coleman, 521 F.2d at 677. WSDOT's statutory obligation to review indirect effects has not been satisfied. Indeed, the EIS candidly admits that indirect effects (or secondary effects, as the DEIS calls them) are not being reviewed. "[T]he potential for secondary effects will be analyzed in the future project-level environmental analysis and review." DEIS S-16; 3-1. As described above, WSDOT may not defer this critical analysis until after an alternative is selected. Moreover, while acknowledging that indirect effects have not been evaluated, the DEIS dismisses out of hand the potential for such effects. Id. at S-15; 3-1 (characterizing indirect effects as "limited and unlikely"). In fact, the DEIS asserts that there will no be indirect impacts to land use at all. See, e.g., DEIS 3.7-8 ("expansion would not result in a change in land use, only a slight increase in the level of disturbance"). No support at all is offered for this conclusion, which can only be described as stunning. The Coalition strongly disagrees with these statements, and believes that the indirect effects of the various alternatives are of critical concern. Indeed, the sprawl-inducing impacts of substantially expanding I-405 are perhaps the single most important consideration for the Coalition. The Coalition further believes that likely indirect effects vary greatly from one alternative to the next. Construction of the preliminary preferred alternative ("PPA"), with its emphasis on significant road expansion, will likely create induced demand for increased automobile-based travel and encourage sprawl-type development rather than new housing and employment	Land Use and Transportation Plans and Policies and Section 3.23.3 Land Use, Transportation, and Development in the Region and Study Area. Also, please refer to the response to comment E66.SOL-1 regarding sprawl-type development.

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				centers in the existing dense urban cores. This fact has been recognized by the courts repeatedly. Swain v. Brinegar, 517 F.2d 766, 777 (7th Cir. 1975) ("In short, 'need' is often a self-fulfilling prophesy in the area of major highway construction."); Sierra Club v. U.S. Department of Transportation, 962 F. Supp. 1037, 1043 (N.D. Ill. 1997) ("Highways create demand for travel and expansion by their very existence.") In contrast, alternatives that emphasize transit and demand management typically result in new residential and employment growth in areas served by transit, i.e., by increasing the density of existing urban cores. While reasonable people might differ as to the policy implications for such a choice, there is no question that these kind of impacts need to be fully disclosed and evaluated in an EIS. The failure of the DEIS to do so is unlawful.	
L51	O	6	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	WSDOT's promulgation and continued adherence to the PPA is itself problematic. The DEIS does not disclose the existence of the PPA, nor does the DEIS even analyze it. This ill-serves NEPA's goal of providing full disclosure of the impacts of proposed action.	Please refer to the response to your comment L51.O-1. The preliminary preferred alternative did not belong in the I-405 Corridor Program Draft EIS, as compared to the No Action and action alternatives. In addition, inclusion of it in the Draft EIS would not improve decision-making or advance public disclosure relative to the confusion that it would likely introduce. The concept of a preliminary preferred alternative was acknowledged and discussed on the I-405 Corridor Project web site and at public forums, open houses, and the public hearings on the Draft EIS.
L51	O	7	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	The DEIS acknowledges this phenomenon with regard to the impact of I-405 to the Eastside's breaktaking growth over the past few decades. "Growth has also taken place throughout the I-405 corridor due to businesses' accessibility to the transportation system and workers' accessibility to residential areas." DEIS 3.13-3. While the DEIS acknowledges that the construction of I-405 spurred substantial new growth in the region, it does not explain why substantial expansion of the highway also will not lead to new growth.	The Draft EIS does not claim that I-405 spurred substantial new growth in the corridor. The substantial changes in land use within the study area have been influenced by a wide variety of factors, of which improvements to the transportation system are only a part. Further, I-405 is one component of the overall transportation system. Please refer to Sections 3.16, 3.21, and 3.23 of the I-405 Corridor Program Draft EIS for additional discussion of factors that have influenced growth, land use, and development within the I-405 Corridor Program study area.

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L51	CU	1	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	The DEIS perhaps pays lip service to this obligation in its section on cumulative effects. DEIS § 3.23.3.5. The analysis contained in this section is wholly unsatisfactory. The section fails to discuss how the different alternatives might encourage or discourage sprawl-type (or conversely, dense) development in various areas within the action area. The sole parameter even contemplated by the DEIS is whether or not pressures for new growth would be within the Urban Growth Area ("UGA"). It does not discuss rural-density growth pressures outside of the UGA, it does not discuss how growth at or near the UGA boundaries will likely result in substantial pressure to shift the boundaries out, and it does not acknowledge that different areas within the UGA may be more or less suitable for different kinds of growth. Ultimately, the DEIS concludes that "there is very little change in overall pressure for growth and development among the alternatives." DEIS 3.23-14. The DEIS appears to take the position that whatever growth will occur in the region will happen regardless of the I-405 project and will not be influenced by the choice of alternatives. Id. at 3.23-64 ("the differences among the I-405 alternatives would not alter the overall cumulative effect . . . to a meaningful degree"). The Coalition finds this conclusion unsupported, not credible, and in conflict with historical experience in the I-405 corridor and elsewhere, as well as relevant studies. See generally Comments of Dr. Robert Johnston (describing how DEIS fails to discuss variations in land use impacts between alternatives). WSDOT must fully analyze how each alternative will encourage or discourage sprawl-type development in the region, a burden that has not yet been met.	As noted in response to comment to L27.LU-1, the I-405 Corridor Program does not substantially increase "sprawl." A detailed table of the changes by forecast analysis zones (FAZ) and by city is provided in the Final EIS, Section 3.13, to clarify the modeling results of employment and households. It should be noted that the growth is projected by PSRC, and directed specifically by the county and city planning agencies. Those agencies have adopted comprehensive plans that direct growth within the UGA. The objective of UGAs is to protect rural areas and focus land use with supporting transportation infrastructures inside the urban areas. The rural areas within King County and Snohomish County are generally not located near the designated highway corridor or significant arterial improvements. A combination of focused transportation improvements in the urban corridor and the UGA will support the growth inside the urban areas. The secondary and/or cumulative impacts of urban development, historically, have been felt in rural areas. These impacts may take the form of higher development pressure when urban developments are built at densities that are too low to meet demand, or when infrastructure capacity is exceeded to the extent that the quality of life is reduced. Traffic congestion is often a key component of the perceived quality of life, and "less traffic" is a reason frequently cited by people moving from urban to rural locations. Thus, traffic capacity improvements in urban areas can have the potential to reduce rural development pressures. Also see response to comment E66.SOL-1.

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L51	O	8	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	The DEIS's Description of The Planned Mitigation Is Inadequate. NEPA requires that an EIS provide a detailed description of the mitigation measures that the agency intends to employ or that would offset some or all of the adverse impacts the agency believes will be caused by the project. As the U.S. Supreme Court has noted, "CEQ regulations require that the agency discuss possible mitigation measures in defining the scope of the EIS, 40 C.F.R. § 1508.25(b), in discussing alternatives to the proposed action, § 1502.14(f), and consequences of that action, § 1502.16(h), and in explaining the ultimate decision, § 1505.2." Robertson, 490 U.S. at 352. As the Court explained, "omission of a reasonably complete discussion of possible mitigation measures would undermine the 'action forcing' function of NEPA. Without such a discussion, neither the agency nor other interested individuals can properly evaluate the severity of the adverse effects." Id.; Carmel-By-The-Sea, 123 F.3d at 1154 (same). Indeed, in at least one instance the Ninth Circuit invalidated an EIS that failed to "analyze[] the mitigation measures in detail or explain[] how effective the measures would be." See Northwest Indian Cemetery Protective Assoc. v. Peterson, 795 F.2d 688, 697 (9th Cir. 1986), rev'd on other grounds, 485 U.S. 439 (1988) ("A mere listing of mitigation measures is insufficient to qualify as the reasoned discussion required by NEPA.") The DEIS's discussion of mitigation measures clearly falls short of these legal thresholds and fails to serve NEPA's purpose of informing the public and ensuring informed decision-making. Indeed, the DEIS frankly admits that the "details of mitigation will need to await further project design and future project-level NEPA and SEPA" review. DEIS S-9; 3-1 ("It is not possible to determine at the programmatic level of analysis for this Draft EIS if mitigation would reduce all adverse impacts to an insignificant level.") For example, in the fisheries section, the DEIS merely provides a broad listing of various mitigation opportunities in affected local	WSDOT has prepared and is implementing a proposed early-action environmental impact mitigation decision-making process. In addition, commitments to specific mitigation have been added throughout Chapter 3 of the Final EIS. Also, please refer to the responses to your comments L51.O-2 and L51.O-3, and to comment L52.SOL-11.

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				jurisdictions. DEIS 3.8-15 through 20. No effort whatsoever it made to prioritize these projects (for the most part habitat improvement efforts) or to analyze the extent to which they would compensate ecologically for the anticipated impacts. See DEIS 3.8-13 (acknowledging that "extensive analysis and negotiation" may be required to link rationally mitigation to project impacts). Similarly, the mitigation section on wetlands impacts "anticipates," without discussion or support, that "sufficient property is available . . . for mitigation," even though such property may be very hard to find in some heavily developed watersheds. Moreover, the DEIS is silent on both the funding sources for these projects as well as other regulatory thresholds or prerequisites, such as state or federal permits or approvals, to actually accomplishing them. See 23 C.F.R. § 771.109 (FWHA NEPA implementation regulations) (FWHA will "assure" that mitigation measures are completed). While the Coalition certainly welcomes all efforts to fund or promote habitat improvement projects, WSDOT must do more than provide local jurisdictions' "wish lists" for desired habitat improvement projects without any further analysis or description. Ultimately, the problem arises from WSDOT's plan to select a course of action based on only the most general description of alternatives and their impacts. Proper NEPA analysis will provide the public and decision-makers with both the likely impacts of each alternative as well as appropriate mitigation.	

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L51	O	9	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	As noted above, NEPA's core "hard look" requirement is intended to both inform the public of the adverse impacts of proposed projects as well as permit informed decision-making by agency officials. See Robertson, 490 U.S. at 349. It is hence of critical importance that an EIS be factually accurate and well supported. 40 C.F.R. § 1502.24 (agencies must ensure the scientific integrity of an EIS). An agency's failure to use the most up-to-date information and tools available undermines the public's confidence in the EIS and renders it legally defective. Tribal Village of Akutan v. Hodel, 869 F.2d 1185, 1192 n.1 (9th Cir. 1989) (EIS "which is incomplete due to the omission of ascertainable facts, or the inclusion of erroneous information, violates the disclosure requirement"); Seattle Audubon Soc. v. Espy, 998 F.2d 699 (9th Cir. 1993) (agency cannot rely on "stale" science or "ignore reputable scientific criticism"); Coleman, 521 F.2d at 676 (rejecting agency position that uncertainty is grounds for not disclosing potential impacts). While "perfect" knowledge is not required, the EIS at least is required to disclose data gaps and the basis for assumptions. 40 C.F.R. § 1502.22 (agency shall make clear where information is inadequate or unavailable). Again, the DEIS falls short. The Coalition's attached expert reports on fisheries, transportation, and land use describe in detail some of the factual inaccuracies and unsupported assumptions WSDOT appears to have made. Additionally, WSDOT has used out of date modeling that fails to reflect the best available data, and ill-serves NEPA's goals of full disclosure. Examples include: use of the same Travel Demand Management ("TDM") program in each of the alternatives, and identical TDM results in each alternative (Skiles Comments, § 2.3.1); erroneous conclusion that transit times would not deteriorate over next twenty years, despite forecasted growth and increased congestion (Id. § 2.3.2); understating induced travel related to land use changes (Id. § 2.3.4); using fixed land use inputs for PSRC travel and emissions models, contrary to professional modeling standards (Johnston Comments, pg. 2). These examples are illustrative, not exclusive.	The specific comments of Steward and Associates, Skiles, and Johnston are addressed subsequently under correspondence codes L54, L52, and L53, respectively. Absent other identification of specific potential legal problems, it is not possible to respond further here.

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L51	LU	1	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	Indeed, some of the more troubling assumptions occur in the critically important area of land use impacts. For example, the DEIS erroneously concludes that Alternative 3 will lessen pressure for new development outside the UGA. See Skiles Report at § 2.3.3. In fact, the Coalition believes that the evidence is clear that just the opposite would occur: Alternative 3 would promote sprawl-type development in less dense areas both in and outside of the UGA, would encourage single-occupant vehicle ("SOV") use, and discourage transit and other non-SOV alternatives. Id.; see also Johnston Comments, at 2 (DEIS ignores transportation impacts associated with land use changes). WSDOT's assumptions in this regard run counter to the evidence and need to be explained.	Please see response to Skiles comment, L52.LU-1. Additionally, the conclusions are supported by the material fact that the growth will be contained within the Urban Growth Boundary under Alternative 3, which is further supported by the adopted regional and local comprehensive plans. Those plans are implemented by specific zoning code standards within each designated urban growth area.
L51	O	11	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	NEPA requires that an EIS contain a discussion of the "alternatives to the proposed action."42 U.S.C. § 101(2)(C)(iii). The discussion of alternatives is at "the heart" of the NEPA process. 40 C.F.R. §1502.14. The CEQ regulations require the agency to "[r]igorously explore and objectively evaluate all reasonable alternatives." 40 C.F.R. §1502.14(a). All federal agencies shall, to the fullest extent possible, "[s]tudy, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." 42 U.S.C. § 4322(2)(E); Idaho Conservation League v. Mumma, 956 F.2d 1508, 1519-20 (9th Cir. 1992). A federal agency must look at every reasonable alternative within the "nature and scope of the proposed action," California v. Block, 690 F.2d 753, 761 (9th Cir. 1982), "sufficient to permit a reasoned choice." Methow Valley Citizens Council v. Regional Forester, 833 F.2d 810, 815 (9th Cir. 1987), rev'd on other grounds sub nom. Robertson	The specific comments of Leon Skiles are addressed subsequently under correspondence code L52. Absent other identification of specific potential legal problems, it is not possible to respond further here.

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				v. Methow Valley Citizens Council, 490 U.S. 332 (1989). The failure to consider all reasonable alternatives is fatal to the adequacy of an agency's NEPA analysis. Idaho Conservation League, 956 F.2d at 1519 ("The existence of a viable, but unexamined alternative renders an environmental impact statement inadequate.") The DEIS is deficient in many respects with regard to the alternatives considered. As noted in the comments provided by Leon Skiles, the DEIS omits consideration of a host of promising non-highway oriented options that would meet many of the region's transportation needs at lower cost and/or with less adverse impacts to the environment and quality of life. These include comprehensive TDM opportunities; diesel multiple unit rail on the BNRR right of way; street connectivity policies and programs; arterial-based bus rapid transit; modified level of service standards; and a transit-oriented development incentives program. See Skiles, § 2.4.	
L51	SOL	1	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	The Coalition believes that these issues can be cured by analyzing and fairly presenting the Coalition's "Sensible Solutions" alternative option for a transportation vision in the I-405 Corridor ("Alternative 5") in the Final EIS. Alternative 5 provides most of the same mobility benefits of the other options at a fraction of the cost and with far fewer of the adverse ecological, quality of life, and transportation impacts associated with extensive highway expansion. Additionally, the Coalition believes that Alternative 5 will help direct new growth and development into urban centers rather than ecologically important undeveloped areas. No other alternative presented in the DEIS meets these objectives and hence we believe that NEPA requires WSDOT to evaluate Alternative 5.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. Please refer to the response to comment E66.SOL-1. The proposal of Sensible Solutions for 405 approximates the overall performance of Alternative 1 - HCT/TDM Emphasis, and Alternative 2 - Mixed Mode with HCT/Transit Emphasis, in meeting the purpose and need for the I-405 Corridor Program. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. The Sensible Solutions proposal was considered in the identification of the Preferred Alternative. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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L51	O	12	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	The Endangered Species Act ("ESA") is "the most comprehensive legislation for the preservation of endangered species ever enacted by any nation." Tennessee Valley Authority v. Hill, 437 U.S. 153, 180 (1978). The U.S. Supreme Court was convinced "beyond doubt" that "Congress intended endangered species to be afforded the highest of priorities." Id. at 174. "The plain intent of Congress in enacting [the ESA] was to halt and reverse the trend toward species extinction, whatever the cost." Id. at 184. The ESA prohibits any federal action from jeopardizing the survival of a listed species, or adversely modifying a species' critical habitat. This substantive mandate of the ESA is considerable. The jeopardy mandate prohibits any federal action that might, directly or indirectly, "reduce appreciably the likelihood of both the survival and recovery of a listed species in the wild by reducing the reproduction, numbers, or distribution" of the species. 50 C.F.R. § 402.02. The prohibition on adverse modification of critical habitat is even more stringent, and essentially disallows any federal action that might get in the way of a species' recovery. 16 U.S.C. § 1532(3) (critical habitat defined in terms of "conservation," which means recovery to the point where ESA protections are no longer needed); 57 Fed. Reg. 1796, 1822 (Jan. 15, 1992) ("the purpose of critical habitat is to contribute to a species' conservation, which by definition equates to recovery . . .); see also 84 Int. Dec. 403, 1977 WL 28897 (Department of Interior Office of the Solicitor decision) ("A federal agency's responsibility to insure against critical habitat modification or destruction cannot be satisfied with the adoption of project modifications which ameliorate and reduce, but do not eliminate, the adverse impacts of the project upon critical habitat.") To ensure that agencies comply with these requirements, the ESA sets up a mandatory consultation procedure between action agencies and expert wildlife agencies. Thomas v. Peterson, 753 F.2d 754, 764 (9th Cir. 1985) (projects may not proceed without	A corridor level EIS leading to a programmatic decision on the best mix of modal solutions, transportation investments, and demand management to improve movement of people and goods throughout the corridor, reduce foreseeable congestion, and satisfy the overall purpose and need is not a federal action requiring ESA consultation. However, FHWA and WSDOT will work with NMFS and USFWS to identify actions that could result in the take of listed species. To address concerns with the workload involved in conducting a large number of individual consultations on I-405 corridor projects (November 26, 2001 letter from Steve Landino), FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for consultation on a programmatic level.

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				complying with the ESA's consultation process, because process is only way to ensure that the ESA's substantive obligations are satisfied). The ESA requires consultation to be based on the best scientific and commercial data available. 16 U.S.C. § 1536(a)(2). Because FHA, a federal agency, is funding this project, formal ESA consultation is required. 50 C.F.R. § 402.02 (§ 7 applies to any activity or program "authorized, funded, or carried out, in whole or in part" by a federal agency). NMFS' limited participation in the planning stages pursuant to the "Reinventing NEPA" process by no means may substitute for proper ESA procedures. See Pacific Coast Federation of Fishermen's Assoc. v. Bureau of Reclamation, 138 F. Supp.2 1228 (N.D. Cal. 2001) (informal contacts between NMFS and action agency discussing project operation cannot substitute for formal ESA consultation; all action enjoined pending completion of consultation).	
L51	FATE	1	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	Puget Sound Chinook salmon are listed as "threatened" under the ESA. 64 Fed. Reg. 14308 (March 24, 1999). Critical habitat for the Chinook includes all marine, estuarine, and river reaches accessible to the fish in Puget Sound. 65 Fed. Reg. 7777 (Feb. 16, 2000). These magnificent fish were once abundant throughout the Puget Sound area. However, decades of poor management, habitat destruction, and pollution have brought the Chinook to the edge of extinction. Clearly, unfettered urbanization and sprawl-type development has played a key role in the collapse of Chinook populations in Puget Sound, particularly in the I-405 corridor. Today, remnant populations remain in several rivers and creeks that will be impacted by this project. Moreover, Coastal/Puget Sound Bull Trout are also listed under the ESA as threatened, and inhabit streams some distance from the project area that may be affected by construction, operations, and induced development. 64 Fed. Reg. 58910 (Nov. 1, 1999). Migrating bull trout may be present in the immediate area of the project. DEIS 3.8-4. The Coalition is gravely concerned that WSDOT is moving ahead with a project that has serious adverse and unevaluated impacts to these species, in possible violation of the ESA.	FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for consultation on a programmatic level. In-depth consultation may be required at the project-level. WSDOT has also prepared a Draft Proposed Early-Action Environmental Impact Mitigation Decision-Making Process. This document coordinates specific programmatic basin-level mitigation with WRIA 8's forthcoming "Near Term Action Agenda" for basin-level mitigation. The Final EIS and programmatic Biological Assessment will adequately address all ESA listed species found in the project area in a consistent manner with a programmatic analysis. As discussed in the Draft Fish and Aquatic Habitat Expertise Report (with references indicated), bull trout presence in the study area is almost entirely limited to migration through the Cedar River to upstream habitat.

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L51	O	13	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	Evidently, WSDOT does not intend to initiate formal ESA consultation on the decision currently under evaluation in the DEIS. WSDOT appears to take the position that the ESA can be satisfied by consultation on the individual projects that will go forward once an alternative is selected. DEIS 2-13 ("project leads will apply for permits and approvals for individual projects considered in this EIS when design has progressed sufficiently") This is emphatically not the case, both as a matter of well-settled law as well as sound public policy and science. Once an alternative is selected from the four presented in the DEIS, separate, individual consultations on each of the hundreds of component projects becomes in large measure redundant. DEIS corridor-wide alternatives involve new lanes of highway construction and extensive expansion of access roads as well as new and sizable commitments to various transit and demand management strategies. Many of these alternatives will, without question, involve major adverse impacts to ESA-listed species. Once a decision has been made to select an alternative, other corridor-wide strategies that might present lesser impacts to the fish will no longer be available. It is entirely unclear whether (and how) WSDOT would return to the corridor-wide decision-making stage if consultation on individual components of the program uncover serious impacts. Indeed, it is hard to imagine how ESA consultation on individual projects within the program would evaluate the risks to fish presented by the corridor-wide strategy as a whole. Clearly, ESA consultation must consider indirect and cumulative effects to species. See Pacific Coast Federation of Fishermens' Associations v. National Marine Fisheries Service, 253 F.3d 1137 (9th Cir. 2001) (ESA does not allow agencies only to look at short term and local impacts of federal agency actions but must look at cumulative effects of all related actions). Indeed, the Coalition is centrally concerned with this project's indirect and cumulative impacts: namely, the induced automobile-oriented development and	Please refer to the responses to your comments L51.O-2, L51.O-3, and L51.O-12. FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for consultation on a programmatic level.

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				urbanization that is almost certain to follow from adoption of alternatives that emphasize highway expansion over transit. National Wildlife Fed. v. Coleman, 529 F.2d 359, 373-74 (5th Cir. 1976) (enjoining highway project based on agency's failure to consider indirect effects of private development that would be caused by highway construction). There is no doubt that increased development of fragile watersheds associated with highway-oriented transportation will have serious impacts on the fish. However, it is unclear how NMFS and FWS would be able to evaluate these impacts within the context of hundreds of separate consultations on individual projects, each with relatively minor direct impacts. Consultation on the process as a whole will allow the agencies to evaluate properly indirect and cumulative effects. In fact, these considerations have guided courts in very similar circumstances to conclude that agencies are flatly prohibited from postponing "programmatic" consultation in favor of project-level analysis at a later stage. See Pacific Rivers Council v. Thomas, 30 F.3d 1050 (9th Cir. 1994). In Pacific Rivers' Council, the Forest Service argued that ESA consultation on existing forest-wide management plans was not required because it intended to pursue ESA consultation on each of the many individual projects that take place pursuant to that plan. The court disagreed, concluding that since management plans have "ongoing and long-lasting impacts," and because individual projects will be implemented according to the plans, consultation on the forest plans as well as the individual projects was required. The court enjoined all forest work that would affect listed species until the consultation process was complete. Id.; see also Connor v. Burford, 848 F.2d 1441, 1453-5 (9th Cir. 1988) (rejecting argument that Services can consult on federal actions in incremental steps). As noted above, the Coalition believes that the impacts to fish associated with the corridor-wide decision making process are far more irreversible and serious than those presented by a "programmatic" forestry consultation, which further underscores the need for consultation at this stage. Accordingly, the Coalition believes that WSDOT may not move forward with any selected alternative until formal § 7 consultation has been completed.	

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L51	O	14	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	First, as described above, WSDOT makes no effort to provide an ecological "accounting" that links proposed mitigation with anticipated impacts. In other words, WSDOT fails to explain how the laundry list of various mitigation proposals will provide an ecological benefit equal or greater to the damage that the project will cause. See, e.g., DEIS 3.8 15-20 (providing each effected jurisdiction's "wish list" of restoration projects). Clearly, this is inconsistent with WSDOT's obligations under the ESA to prevent jeopardy and promote recovery. See, e.g., National Wildlife Fed. v. Babbitt, 128 F. Supp.2d 1274. 1292-92 (E.D. Cal. 2000) (rejecting habitat conservation plan for failing to explain rationale behind proposed mitigation plan).	Please refer to the response to your comments L51.O-8 and L51.O-13.
L51	FATE	2	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	Second, many of the proposals that WSDOT puts forward in the DEIS for mitigation, while potentially very beneficial for fish, nonetheless require future action, funding, commitments, or procedural prerequisites by other state and federal agencies. In other words, even if WSDOT commits to such mitigation projects, WSDOT is in no position to guarantee that they will actually occur. The ESA plainly prohibits such speculative actions. See Sierra Club v. Marsh, 816 F.2d 1376 (9th Cir. 1987) (action agency cannot insure project will not jeopardize species based on promise of future mitigation measures); National Wildlife Fed. v. Coleman, 529 F,2d 359, 374 (5th Cir. 1976) ("This reliance on the proposed actions of other agencies does not satisfy the FHWA's burden of insuring that its actions will not jeopardize the continued existence of the crane."); National Wildlife Fed. v. Babbitt, 128 F. Supp.2d at 1293-94 (rejecting HCP based on speculative funding sources for mitigation). In the Coalition's view, WSDOT is not permitted to take actions that harm the listed species based on largely speculative assurances that the harm will be mitigated at a later date.	For WSDOT to go forward with the I-405 Corridor Program, mitigation will occur. Please refer to the second half of the response to comment L51.FATE-1.

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L51	O	15	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	The Coalition acknowledges that WSDOT has made efforts to work with NMFS in the past, and has been frustrated by the lack of clear guidance. In our view, NMFS and WSDOT are in a "chicken and egg" type situation: NMFS is reluctant to make a clear statement on impacts until it has more detailed information on site-specific design from WSDOT. WSDOT, in turn, is reluctant to move ahead with site-specific design until it has greater input from NMFS. Regardless of how the impasse is resolved, the ESA's substantive limits remain: until NMFS can assure the public that the I-405 project will not jeopardize the listed fish or adversely modify their critical habitat, no further action can be taken on the project.	Please refer to the response to your comment L51.O-13.
L51	FATE	3	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	As described above and in the attached comments, pursuing the highway expansion alternatives will have serious adverse impacts to ESA-listed fish, possibly in violation of the ESA. The Coalition strongly disagrees with the DEIS' conclusion that there is no significant difference between the alternatives with regard to land use impacts, many of which have serious adverse impacts to listed fish. The Coalition believes that WSDOT must make every conceivable effort to minimize and mitigate impacts at the point of anticipated harm. This may well require that WSDOT pursue an alternative designed to minimize new road construction and maximize transit options. Once a programmatic alternative that minimizes harm to the fish to greatest degree possible has been selected, WSDOT will be required to carry through the effort to find and implement ways to mitigate unavoidable site-specific impacts. However, WSDOT may not proceed with activities until it can offer assurances that the mitigation can and will proceed. See, e.g., Marsh, 816 F.2d at 1386 ('We hold that the [Corps of Engineers] is in violation of section 7(a)(2) by allowing destruction or adverse modification of any part of the birds' habitat without first insuring the acquisition and preservation of mitigation lands.') (emphasis added).	Please refer to response to comment L51.FATE-1. In addition, please see Section 3.23.4.5 of the Draft EIS for a discussion of cumulative impacts to fish. This section briefly reviews the variations in growth pressure among the alternatives, relates these to effects on fish habitat, and makes conclusions that the four action alternatives do have different cumulative effects for fish.
L51	O	16	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	1) Begin preparation of a biological assessment under the ESA and, at the appropriate time, initiate formal consultation with NMFS and FWS on the impacts of the project to threatened and endangered fish species;	Please refer to the response to your comment L51.O-13.

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L51	O	17	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	2) Revise the EIS to address the flaws described above in terms of adequate detail, analysis of indirect impacts, and mitigation;	Please refer to the response to your comments L51.O-2; L51.O-3; L51.O-5; L51.O-8; and L51.O-13.
L51	O	18	Jan Hasselman 418 First Ave W Seattle WA 98109 Agency: National Wildlife Federation	3) Include in the Final EIS a full and fair evaluation of the Coalition's independent alternative based on transit and smart growth incentives.	Please refer to the response to comment E66.SOL-1.
L52	O	1	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	The purpose of this document is to provide the I-405 Steering Committee and the Washington State Department of Transportation (WSDOT) with a detailed set of comments from Sensible Solutions for I-405 on the I-405 Draft Environmental Impact Statement (DEIS) (WSDOT: August 2001). These comments are being submitted within the DEIS public comment period, which was extended by WSDOT to October 24, 2001. This document focuses on the description of alternatives, transportation and transportation-related aspects of the I-405 DEIS, which are generally found within sections 2.0, 3.12, 3.13, and 3.23 of the DEIS, appendices A and B of the DEIS, all of the draft Transportation Expertise Report and the capital cost spreadsheets for the build alternatives, dated January 4, 2001, all of which were published by WSDOT as a part of the I-405 DEIS effort. Sensible Solutions for I-405 was assisted in preparing these comments by Leon Skiles, Principal with Leon Skiles & Associates, Incorporated, a consulting firm specializing in project management, transportation planning and the preparation of Federal environmental impact studies. Mr. Skiles has almost twenty years of experience in transportation planning. Mr. Skiles is currently assisting Washington County, Oregon, in the preparation of Federally-mandated project management documents for a proposed fifteen-mile commuter rail line between Wilsonville and Beaverton, Oregon. He is also assisting Metro in Portland, Oregon, in the preparation of the South Corridor Supplemental Draft Environmental Impact Statement for a proposed light rail line between Portland and Clackamas County.	Your specific comments are addressed below under correspondence code L52.

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				Previously, Mr. Skiles was the Transportation Planning Manger for Metro in Portland, managing the project development processes for Federally-funded light rail projects, including the South/North Light Rail Project and the Hillsboro extension of the Westside Light Rail Project. His responsibilities at Metro included managing the writing and publication of two draft and two final Federal environmental impact statements and their supporting documents. Prior to his work at Metro, Mr. Skiles was employed with Metro in Seattle, Washington as the Capital Projects Coordinator responsible for the management of the East Corridor within the High Capacity Transit Study and for the High Occupancy Vehicle/Busway Study. Prior to Seattle, Mr. Skiles worked in Eugene, Oregon as a Senior Transit Planner with Lane Transit District. The comments included within this report generally fall within the following three categories: * Adequacy of the DEIS – comments on the adequacy of the analysis, results, documentation and range of alternatives of the I-405 DEIS; 8 Critical Findings – findings within the I-405 DEIS that support the conclusion that the alternatives within the DEIS, and especially Alternatives 3 and 4 that emphasize investments in capacity for general purpose automobile travel, are too costly, have too many significant environmental impacts and do not adequately address the transportation problems and land use opportunities within the corridor; and * Recommended Preferred Alternative – Sensible Solutions for I-405's recommended preferred alternative for the I-405 Corridor, which is affordable, efficient, effective, supportive of our region's land use goals and objectives and environmentally sound.	

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L52	O	2	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.0 Adequacy of the DEIS The purpose of this section is to provide comments on both the general approach taken within the I-405 DEIS and specific elements of analysis, results, documentation and range of alternatives in the DEIS. In particular, this section highlights several deficiencies that we have found in the DEIS relative to is presentation of the alternatives and the alternatives 'environmental impacts. This section also identifies apparent flaws in the project's methodologies that may have produced incorrect results as reported in the DEIS and its supporting documents. Individually and collectively, these are important deficiencies because they: 1) hinder the public's ability to understand the alternatives under consideration; 2) inappropriately limit the disclosure and the public's understanding of the impacts associated with those alternatives; and 3) make it difficult for the public to develop an informed decision on a preferred alternative. Following are the general areas of the DEIS that we have found to be deficient: * Format; * Missing information or analysis; * Questionable results; and * Inadequate range of alternatives. 2.1 DEIS Format as a Decision-Making Document Several aspects of the DEIS's format hinder its use as a decision-making document and obfuscate the comparison of the alternatives. The purpose of this section is to provide a wide spectrum of examples that illustrate how alternatives and their impacts are presented and discussed in the I-405 DEIS, and to demonstrate how the style of the DEIS limits its ability to adequately disclose the impacts of the alternatives. By limiting the public's understanding of the alternatives and their impacts, the format of the DEIS also limits the public's ability to make an informed choice among the alternatives and options under consideration. In most of these instances, industry-standard practices of how a DEIS is laid out and written have not been adhered to.	Your specific comments are addressed subsequently. Absent other identification of specific potential legal problems, it is not possible to respond further here.

Code Number			Name	Comment	Response
L52	O	3	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.1.1 Comparison of the Alternatives and their Impacts. The format of the I-405 DEIS does not facilitate the comparison of the alternatives, as it should if it is to function as a decision-making document – in fact, comparing the alternatives using the DEIS is arduous and time consuming. The formatting deficiency is most pronounced in the structure of the I-405 DEIS sections themselves – instead of comparing the alternatives by each characteristic in the text, supported by summary tables and graphics, the I-405 DEIS discusses all of the characteristics of Alternative 1 first, followed by a comprehensive discussion of Alternative 2, and so on. Further, the text of the DEIS generally focuses on comparing each build alternative with the No Action Alternative, and it generally does not compare the build alternatives with each other. By generally avoiding a comparison of the build alternatives, trade-offs between the build alternatives are generally ignored in the I-405 DEIS, which is one of the most important decision-making functions that an EIS should provide to the public. One of the most awkward aspects of the current format of the I-405 DEIS is the placement of summary tables in relationship to the text that refers to them. In the I-405 DEIS, the summary tables are generally located within the proximity of the discussion of the No Action Alternative or Alternative 1, and, therefore, the table is separated by dozens of pages from the sections of text for Alternative 2, 3 and 4 that refer to those tables. For example, Table 3.12-9 Vehicle Hours Traveled (VHT) and Vehicle Miles Traveled (VMT) for the Study Area and Region-Wide is located on page 3.12-12 of the DEIS (a page after the discussion of VMT and VHT for	The organizational format for the presentation and comparison of the effects of the alternatives in the I-405 Corridor Program Draft EIS is a standard for NEPA and SEPA EISs. This standard was retained for this EIS because, as you observe, it provides a comprehensive discussion of the effects of each alternative. This is of critical importance because of the systemic nature of the alternatives. Organizing the discussion of impacts by individual measures of effectiveness, as you appear to suggest, would have made it much more challenging for the reader to recombine these distinct discussions into an effective understanding of the overall effects of each alternative. Through use of tables, sub-headings, and parallel construction of the discussions, the Draft EIS provides reasonable comparisons across specific types of impacts, and it enables the reader to effectively do the same. Regarding comparison of the action alternatives, each is compared to a common measurable baseline, the No Action alternative; in addition, there are many examples within the Draft EIS where the effects of the alternatives also are compared to one another. It is not clear from your comment where you find these comparisons to be absent.

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				Alternative 1), but the majority of the text referring to the table occurs on pages 3.12-27, 3.12-31 and 3.12-35, for Alternative 2, 3 and 4, respectively. This format makes it very difficult to refer between the text and tables and to perform a critical and comparative review of the alternatives. To correct these formatting deficiencies, the DEIS should be restructured so that each characteristic or criteria (e.g., congestion relief, transit travel times, vehicle miles traveled, etc.) is discussed across the four alternatives before moving on to the next characteristic. Each characteristic should be supported by a summary table showing the performance of each alternative and the text should provide a detailed discussion of the tradeoffs between the alternatives. If the DEIS is not reformatted, then WSDOT should provide the public and decision-makers with a decision-document that includes a summary comparison of the alternatives by criteria or characteristic. This recommendation is based upon the Council for Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, 40 CFR § 1502.14, which states that "[The DEIS] should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker[s] and the public."	
L52	O	4	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.1.2 Missing Data in Figures and Graphs Many of the figures and graphs used within the DEIS do not include the foundational data used to create the figure or graph. For example, Figures 3.12-1A through 3.12-1C, which illustrate peak-period person demand by mode for various screen lines, only provide a bar graph of the results of the analysis, while the actual data resulting from the analysis and used to create the graph is absent from the DEIS. Data used to prepare some of the figures and graphs in the DEIS are provided in Appendix I: Transportation Data within the draft Transportation Expertise Report.	It is not reasonable or practical to include all foundational data used or referenced in the Draft EIS within the Draft EIS itself or within the expertise reports. In addition, data and analytical results have been presented, discussed, and interpreted in a manner that makes them most meaningful and accessible to the majority of the public, agencies, and decision-makers. Recognizing that different users of the Draft EIS have different interests and levels of expertise for data and interpretation, representatives of the co-lead agencies have met and communicated with you and with Sensible Solutions for 405 on several occasions to discuss data and approaches to

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				However, the data provided in the DEIS and supporting documents are selective: much of the supporting data for tables and figures are not included (e.g., Figure 3.12-3 of the DEIS and Figure 4-11 of the draft Transportation Expertise Report), and where the data do exist in the appendix the figures do not refer the reader to the appendix, as it should (for example, Figure 3.12-1A should include a note that refers the reader to Table 1A in Appendix I of the draft Transportation Expertise Report). In some instances within the expertise report, the data for the graph are provided in Appendix H: Transportation Data, but the supporting table is not referenced in the graph. It is fundamental for a DEIS to disclose the data summarizing the impacts associated with the alternatives under consideration. Graphs and figures should only complement the tables, and should be used illustrate the data included in the tables. All figures and graphs in the DEIS should either refer to the appropriate tables of data used to prepare them, or they should integrate the data within the figures and graphs themselves. Providing the underlying data on impacts is compulsory for an EIS, and the underlying data cannot be supplanted by graphs and figures, because graphs and figures provide only one way of looking at the underlying data. Without the underlying data, we and others of the public are unable to develop our own comparative analyses or our own graphs and figures that are needed to fully understand the impacts associated with the alternatives. A significant example of missing data occurs in the Transportation Expertise Report, in Figure 3-5: Growth in Freeway Region-Wide Daily VMT (000's) and Freeway Lane Miles 1982-2000 (page 3-7). In that figure, as the title suggests, the daily VMT is displayed concurrently with lane miles. The y-axis scale for the figure is in increments of 5,000, between 0 and 30,000, which is adequate to illustrate the growth in VMT. However, the graph's y-axis scale is entirely inappropriate for illustrating lane miles, which, even on a regional level, are measured in hundreds, not thousands. With such a large scale in proportion to the base data, the line representing regional lane miles hovers just above the x-axis with no perceptible difference between the alternatives.	analysis in the Draft EIS, respond to specific questions, and make foundational data and information available. The co-lead agencies are not aware of any substantive requests that have gone unfilled. Figure 3.23-14 is revised in the FEIS. Table 3.23-14 was created with the requested data in the FEIS in 3.23.3.6. The lane mile data were compared between the WSDOT information and the TTI reports and corrected.

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				Further, none of the underlying data for either VMT or freeway lane miles is provided in the figure or in a companion table. Instead, a table showing lane miles and VMT by year should be provided, perhaps with a resulting comparison ratio. Then the table could be illustrated using a graph with two y scales, one for VMT and one for lane miles. Without providing the underlying data and by using an inappropriate scale for lane miles, the graph is meaningless at best and misleading at worst. (As an aside, it seems inappropriate to obtain VMT and lane mile data for Seattle from the Texas Transportation Institute when better data are available from local sources, such as Puget Sound Regional Council (PSRC) and/or WSDOT.) In conclusion, the DEIS should be revised to include the foundational data used to prepare any graphs or figures included in the DEIS or its supporting documents.	
L52	O	5	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.1.3 Lack of Clarity in the Description of Alternatives This section addresses various aspects of the description of alternatives within the I-405 DEIS and highlights deficiencies that could impair the public's ability to understand the scope of the alternatives being considered and their ability to select a preferred alternative.	Your specific comments are addressed subsequently.
L52	O	6	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	Additional Lanes on I-405 Under Alternative 3 Page 2-8 of the DEIS, in the Description of Alternatives chapter, states that Alternative 3 'would substantially increase the capacity of I-405 by adding two additional lanes in each direction..." Further, on page B-1 in Appendix B, I-405 Corridor Program EIS Alternatives Project Matrix, the DEIS implies that with Alternative 3 two general purpose lanes would be added in each direction throughout the length of I-405, from I-5 in the south (Tukwila) to I-5 in the north (Swamp Creek). Appendix B of the DEIS includes a matrix that provides a breakdown of the improvements into nine distinct segments of I-405. Within the appendix, each segment of I-405 under Alternative 3 is described as including 'two additional GP [general purpose] lanes in each direction." These nine segments are included as detail for a larger program element for Alternative 3, termed 11. Two Additional GP Lanes in Each Direction.	Alternative 3 as analyzed included the equivalent of 2 lanes in each direction along the entire length of I-405. From a design standpoint, some segments were laid out with one additional through lane, plus either a collector-distributor lane(s) or auxiliary lanes. At the programmatic level, this amount of design detail is appropriate. The balancing of lanes was refined further during the development of the Preferred Alternative and is documented in the FEIS in Section 3.12.4.6. Subsequent project-level evaluations will examine the freeway design in greater detail. In some cases within the Draft EIS only the mainline freeway lanes are noted, while other situations include the existing auxiliary and collector-distributor lanes. This minor discrepancy was reconciled in the FEIS in Section 3.12.

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				However, at a meeting on September 20, 1999 with Sensible Solutions for I-405 staff, WSDOT and consultant staff indicated that Alternative 3 would, in fact, not widen I-405 by two lanes in each direction throughout the length of the freeway, and that some segments would only be widened by one lane. After a detailed review of the documentation, we have found that the DEIS, the draft Transportation Expertise Report and the draft I-405 Corridor Program Alternatives Report only reference the addition of two general purpose lanes in each direction for Alternative 3, and they do not modify or qualify that description. Either the information provided verbally at the meeting was incorrect, or the description of the alternatives provided in the DEIS and its supporting documents is in error. If the DEIS is in error, the DEIS should be corrected to ensure that the scope of Alternative 3 is clearly and accurately defined and that the impacts associated with Alternative are accurately disclosed. Without an accurate description of Alternative 3, the public and decision makers will be unable to formulate an informed preference for a preferred alternative. Another minor example in the lack of clarity in the DEIS in describing the capacity of I-405 occurs on pages 3-1, where the current freeway is first described as having "six to ten lanes along the 30-mile corridor," and later on page 3-9, where it states that "the total number of freeway travel lanes (both directions) along I-405 varies from six to nine (including the HOV lanes) except in the far north end where there are currently only four lanes."	
L52	O	7	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	Undefined Collector Distributor Lanes in Alternative 3 A further example of lack of clarity in the description of alternatives can be found in Appendix A, under Section 12. Provide Collector Distributor Lanes on I-405, which states that, "Collector-distributor lanes...[are] being considered as a design option to handle the addition of one or two general purpose lanes in each direction along I-405 in certain sections...[and] have been included as parts of other elements." It is unclear from the DEIS and supporting documents where along I-405 those collector-distributor lanes are being considered. Further, the DEIS does not describe the process that will be used to evaluate costs and impacts of the collector-distributor laned and to decide whether to include the additional lanes within the preferred alternative.	Each of the action alternatives includes the assumptions of collector-distributor (C/D) lanes at chosen locations in the corridor. These C/D lanes were included based upon sound freeway design experience as being integral to the overall freeway operation. The costs of these lanes were included in the freeway widening totals for each alternative.

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				Additional collector-distributor lanes could significantly increase costs and impacts associated with an alternative, depending upon their location. If any additional collector distributor lanes are being or are likely to be considered for any alternative as an additional option, those options should be disclosed within the DEIS and its supporting documents, and the costs and impacts of those additional lanes should be disclosed prior to the selection of a preferred alternative. The additional information would allow the public to make a more informed choice among the alternatives and options presented within the DEIS.	
L52	TR	1	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	Limited and Illegible Diagrams of I-405 Lane Configuration Lack of clarity in the description of the alternatives also occurs in Appendix E, Roadway Sections, of the DEIS, which attempts to provide a visual description of the lane configuration of I-405 under the various alternatives. However, there are several problems associated with the Appendix E drawings: the drawings are reproduced in the DEIS with a very grainy and poor resolution making them difficult and, at times, impossible to read; the DEIS provides a very limited number of cross-sections considering the facility is approximately 30 miles long and that its current and proposed lane configuration changes almost every mile; the DEIS does not provide the same cross-sections for each alternative; and, the DEIS does not include a cross-section for each alternative at the same location. These deficiencies in the cross-sections severely limit the utility of Appendix E in helping to understand the lane configuration of I-405 under each alternative, which is at the heart of understanding operational characteristics and impacts of each alternative. Providing comprehensive and understandable descriptions and diagrams of the lane configuration of I-405 under each alternative should be fundamental to the I-405 DEIS. Without these baseline descriptions, the DEIS's analysis of impacts associated with the I-405 alternatives is incomplete.	The project team has cross sections and plan drawings along the entire corridor for each alternative. These are available for review through the WSDOT Urban Corridor Office. The exhibits in FEIS Appendix E are meant to be illustrative of conditions along the corridor.

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				In spite of their absence in the DEIS, it seems unlikely that WSDOT has not yet developed these drawings and diagrams, because they should be a requisite input into the travel demand modeling and other analyses. Rather, it is likely that Appendix E only provides a sampling of the available information that should be made available to the public. If those detailed diagrams and/or drawings do exist, they should be disclosed and made available to the public; if they do not exist, WSDOT should prepare the drawings and diagrams and should make them available to the public. And any drawings that are made available to the public should be readable.	
L52	O	8	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	Missing Links Another example of the lack of clarity of the alternatives within the I-405 DEIS is with the term missing links. In Section 2.2.4 Alternative 3: Mixed Mode Emphasis, the DEIS states that with Alternative 3, "selected arterial missing links would be completed together with planned arterial improvements of local jurisdictions" (emphasis added, page 2-8). Table 2.2-1 of the DEIS notes that missing links are unique to Alternative 3. The term missing link is not defined there or elsewhere in the DEIS or its supporting documents, but one can assume that it means missing connections in the arterial network within the I-405 Corridor. Appendix A, on page A-13, lists 11 projects that make up category 18 projects, termed Expanded Capacity on North-South Arterials. While these category 18 projects listed on page A-13 of the DEIS are not defined as missing links, they are described as facilitating "vehicular movement without requiring as many trip along I-405." These projects, which WSDOT has given the prefix R.AC- for their unique project identification number, are only included in Alternatives 3 and 4 in WSDOT's capital costing spreadsheets. However, the projects do not seem to constitute the missing links, because missing links are unique to Alternative 3 (see Table 2.2-1).	Each of the arterial improvements included in a particular alternative is shown in Appendix B. The assumed definition of a 'missing link' is correctly stated by the commenter. Table 2.2-1 is incorrect; the missing links are included in both Alternatives 3 and 4. These points were clarified within the FEIS Section 2.2 in Table 2.2-1. Some of the R.AC projects include the 'missing links' analyzed as part of Alternative 3 plus other roadway widening projects unique to Alternative 4. Refer to FEIS Appendix B- pp B-2,3 for a listing of the projects included within each alternative.

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				Comparing the capital cost spreadsheets for Alternatives 2 and 3, it would appear that the missing links may be R.AC-16, R.AC-17 and R.AC.30, because those three projects are included under Alternative 3 and are not included in Alternative 2. However, each of those three projects is included in Alternative 4, according to WSDOT's capital cost spreadsheet for. And because the missing links are unique to Alternative 3, according to Table 2.2-1, those three projects must not be the missing links. Alternative 4 includes all but one of the category 18 projects. Other arterial projects for the corridor are included under a separate category, category 17. Planned Arterial Projects. However, the same category 17 projects are included in both Alternatives 2, 3 and 4. All of this complex situation is highlighted here to illustrate again how unclear the description of alternatives is in the I-405 DEIS. Supplemental information should be provided to the public that clearly defines the term missing link and that assigns specific projects to that category of arterial improvements. Finally, if the missing links occur in more than one build alternative, then Table 2.2-1 should be corrected, or if missing links are unique to Alternative 3, then WSDOT's capital cost tables are in error and they should be corrected.	
L52	TR	2	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	Lane Balance Similarly, the DEIS and its supporting documents refer to the concept of lane balance. However, lane balance is never specifically defined in the DEIS, nor are the costs or impacts of lane balance disclosed in the DEIS. Only within the Executive Summary, under the Unresolved Issues, is lane balanced discussed within the DEIS, and in the Summary only one short paragraph is devoted to the topic. The Summary notes that "Project proponents are working to refine the actual number of lanes that are appropriate for different sections of the freeway to account for proper balancing of lanes within each alternative. This balancing will account for physical and operational constraints, as well as changes in the traffic demand that occurs along the 30-mile corridor" (page S-12).	Lane balance has been an evolving design and operational concept throughout the study. The lane balance analysis has been used to examine specific transitions between freeway segments, in order to better understand whether through travel lanes or collector-distributor or auxiliary lanes are appropriate. The Draft EIS captures the corridor-level effects of mainline lane additions and major improvements to interchanges and freeway connections. Many of the specific lane balance decisions will be made at the design level of analysis. Specific collector-distributor lanes are included in the Preferred Alternative design concept. These locations are identified in Section 3.12.4.6 of the FEIS. The FEIS also includes a sensitivity test relating to added auxiliary lanes in the segment of I-405 between I-90 and SR 900.

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				If lane balance is an option that is or is likely to be considered for I-405, and if that consideration is likely to change the proposed lane configuration of I-405 beyond the alternatives under study, then the term and option should be defined in detail in the DEIS and its costs and impacts should be disclosed before a preferred alternative is selected. Furthermore, it seems that the question of "the proper number of lanes" that "account for physical and operational constraints" and "changes in traffic demand" is at the heart of the I-405 Corridor DEIS and should be fully evaluated and disclosed within its context, not as an aside within an unspecified process.	
L52	O	9	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	Corrective Action To correct the lack of clarity in defining the alternatives, the DEIS and/or a generally-available supporting document should be amended to include comprehensive, consistent and easily understandable text and figures that accurately describe the current and proposed lane configurations of I-405 under each alternative and option under consideration. More specifically pertaining to the proposed lane additions for I-405, if some segments of I-405 would receive no additional general purpose lanes under Alternatives 2 and 4 or would receive only one additional lane in either direction under Alternative 3, then that information should be disclosed within the DEIS or a supporting document. Further, if more than two additional lanes are or are likely to be considered for segments of I-405 and/or SR 167 (other than the auxiliary and truck climbing lanes already disclosed), then those additional lanes should be identified and their additional impacts should be disclosed to the public. With respect to illustrating the proposed lane configurations of I-405, both to-scale base maps and not-to-scale schematics should be used to provide this information to the public. We suspect that these drawings may currently be available to project staff and possibly to some decision-makers, but, for some reason, they have not been disclosed to the general public – a situation that, if it in fact exists, should be corrected. Drawings posted at the project's open houses and public hearings in September 2001 included detail of this type, but those drawings are not referenced in the DEIS and its supporting documents and they do not appear to be generally available to the public.	The Transportation Expertise Report provides additional discussion of the transportation results. As indicated in the response to comment L52.O-8, each of the action alternatives includes some variation in freeway widening along the I-405 corridor. At the programmatic level, documenting the basic number of lanes added along the freeway is considered reasonable disclosure of the project element. During the detailed project-level evaluation, several other design variations will be studied in detail. The Draft EIS evaluation was conducted using conceptual design drawings along I-405. These drawings, when plotted at a reasonable scale along the corridor, equal several feet of drawing. This level of detail is not reasonable to include within the Draft EIS document. As noted, we showed several of these drawings to the public during the many open houses and public meetings. The FEIS includes some additional detail on the Preferred Alternative in Section 3.12.4.6, consistent with the scale of the programmatic evaluation.

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				In relationship to the missing links, if the category 18 projects are the missing links, then Alternative 4 includes missing links, and the tables in Chapter 2 and Appendix A should be corrected. If missing links are some other group of arterial projects, then they have been omitted from the DEIS and they should be identified. Independent of how the term is applied, it is inconsistent to apply the category 18 projects, which would, by definition, reduce demand on I-405, exclusively to Alternatives 3 and/or 4, which would both significantly increase the vehicular capacity of I-405, and not to Alternatives 1 and 2, which would provide no or only modest vehicular capacity increases to I-405. Instead, the category 18 improvements should have been assigned to Alternatives 1 and 2, as an alternative action to widening I-405. This additional information should be made available prior to the selection of the preferred alternative, because it is elemental to the DEIS, the analysis and understanding of the alternatives and to the selection of one alternative and option over another.	As previously noted in response to comment L52.O-8, the FEIS includes a clarification of the missing links definition in Section 2.2. The missing links are included in both Alternatives 3 and 4. Alternatives 1 and 2 emphasized minimal additional road capacity. As such, the committees recommended putting minimal arterial and freeway improvements into those alternatives. In fact, Alternative 1 does not even include the 'planned' arterials that are already part of agency plans. Certainly, one could make the case with any of the alternatives that providing additional arterial capacity could offset the need for a portion of the freeway capacity. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.
L52	O	10	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.2 Missing Information or Analysis This section outlines various areas of analysis or information that is missing from the DEIS and that should be developed as supplemental documentation to allow for the selection of the preferred alternative and publication of the FEIS. 2.2.1 Performance of Various Options Within Alternatives The preferred alternative for the I-405 Corridor will, by definition, be a mix of interrelated projects crossing jurisdictional boundaries, involving a variety of transportation modes and including non-transportation projects (e.g., land use actions). As illustrated in Appendix A and Appendix B of the DEIS, the alternatives considered within the DEIS are made up of a combination of various options, some common to two or more alternatives and some unique to one alternative.	Because of the systemic nature of the alternatives, it is not reasonable or practical to isolate the specific contribution of each option or major element across the range of performance measures and impact measures presented in the Draft EIS. As discussed on page S-2 of the Draft EIS, follow-on project-level NEPA and SEPA environmental analysis, documentation, and review will be prepared to enable decisions regarding site-specific, project-level details on alignments, high-capacity transit technology, project impacts, and mitigation measures. This will include, if necessary, reexamination of the need for the projects on an individual basis to enable adaptation to changing conditions, needs, and information. It is not necessary or appropriate to prepare this documentation as a supplemental EIS based on the requirements of 40 CFR 1502.9 and WAC 197-11-405.

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				However, the DEIS does not provide an adequate level of analysis of the options that make up the alternatives. This lack of detail at the option level makes it difficult for the public to assemble a hybrid alternative, assembled from the options being considered into a unique preferred alternative. The lack of detail of analysis at the option level also makes it difficult to understand the interrelationship between the options. For example, what is the relationship between the transit ridership achieved with the transit system and the completion of the missing [arterial] links in Alternative 3? Or, what is the relationship of HOV and transit use to the presence or absence of freeway-to-arterial HOV ramps included in most of the alternatives? Much more detail should be provided by WSDOT on the performance and interaction of the various options that make up the build alternatives and how those options would interact in different configurations. Another example of inadequate analysis and documentation of the underlying options can be seen with the missing links, as referenced in Section 2.1.3 of this report. While we previously pointed out that it is difficult to determine exactly what the missing links are, it is also impossible to determine from the information provided in the DEIS whether the missing links or the Category 18 improvements would actually help to reduce vehicular demand on I-405. Category 18 improvements are outlined on page A-13 of Appendix A and are described as being designed to 'facilitate vehicular movement without requiring as many trips on I-405." Because these projects are only included in Alternatives 3 and/or 4, it would be beneficial to the public to know their efficacy in reducing I-405 demand so that if they are effective the improvements could be included in an alternative that would provide less vehicular capacity on I-405, but that would still intend to respond to demand for north-south travel in the corridor.	

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				The additional detail on the options that constitute the alternatives would also disclose to the public the particular source of various impacts associated with an alternative, and this more detailed knowledge would facilitate a more informed selection of a preferred alternative. For example, with respect to noise impacts or displacement impacts, it would be beneficial to know what proportion of impacts would occur along each of the roadways proposed to be widened, such as I-405, SR 167, I-90 and so on. Much of this level of detail called for should already be available to WSDOT, because it would have been prepared at the detail level and summed for each alternative. In general, only travel demand data generated through the regional travel demand model would require additional analysis by WSDOT, that is, additional model runs. However, all of the information needed to prepare these additional model runs should be readily available. The additional model runs would only require the development of several more modeling scenarios in order to isolate the impacts of individual options on travel demand. If this level of information is not made available now, or if the current information is so general that it proves to be incorrect or incomplete, supplemental EISs may be required in the future specific projects are developed and are advanced through the Federal environmental process. Further, decisions made using information that is too general and that proves in the long run to be incorrect may need to be revisited in subsequent Federal environmental processes. By providing the appropriate level of detail now, future delays in the environmental process could be delayed and the public could be assured that it has all of the available information in hand to make the decisions at hand.	

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L52	TR	3	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.2.2 Additional Analysis of Transit Service Plan and Levels of Service In review of the DEIS and its supporting documents, we have found that there was a significant lack of detailed development of the transit networks for the alternatives evaluated in the DEIS. This lack of detail can be seen by comparing the detail provided for the roadway elements of the alternatives compared to the detail provided for the transit elements. For example, all of the highway projects are mapped in the DEIS or its supporting documents, but no maps are provided for the transit routes, either HCT routes or bus routes. Further, the level of detail in the analysis and documentation for the transit elements of the alternatives is much lower than it is for the highway elements of the alternatives, and it is much lower than is needed to adequately evaluate the transit options proposed by WSDOT. The DEIS itself recognizes this deficiency: page S-11 of the Executive Summary of the DEIS, under the section titled Unresolved Issues, states that, "The I-405 Corridor Program analyzed specific changes in transit service hours associated with each alternative. These assumptions are being further analyzed for potential refinement prior to selecting a preferred alternative in the Final EIS" (emphasis added). Sensible Solutions for I-405 concurs – a much more detailed transit service plan for the Eastside should be developed for the DEIS analysis, for selecting the preferred alternative and for publication of the FEIS. It would appear that only existing transit routes were used for the DEIS's travel demand forecasting effort, with only the adjustments made to the headways. However, it is difficult to be sure how the transit network was actually defined because the HCT and transit routes are only very generally defined within the text and no specific routing maps are provided. Service levels are only described as being 50% or 100% increases over existing planned levels, with no description of how those service hours would be distributed among routes or throughout the service area, hours of the day or days of the week. This level of detail is out of balance with the level of detail that was invested into the highway projects, especially the I-405 widening projects.	A unique, alternative-specific transit network was developed for each alternative (except that the same network was used for both Alternatives 1 and 2). These alternative-specific transit networks defined the routing, stop locations, and level of service of HCT and bus lines throughout the study area for both peak period and off-peak period conditions. Detailed listings of the bus routes assumed for each alternative are provided in Appendix M of the Final EIS. The statement in the Executive Summary of the Draft EIS is simply an acknowledgment that the Preferred Alternative may be a modification of or a hybrid of the alternatives described in the Draft EIS. A unique transit network and service plan for the study area has been developed for the Preferred Alternative just as unique transit networks and study area service plans were developed for the alternatives described in the Draft EIS. The Draft EIS also included a sensitivity test of an enhanced transit network. Refer to FEIS Section 3.12.4.2.

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				Without a concerted effort to define the transit network and facilities for analysis in the DEIS, the public cannot be assured that the best possible or most promising transit alternatives have been developed for comparison with the expanded highway networks. Further, the lack of detail hinders the public's ability to assess the impacts associated with all of the alternatives, each of which includes a proposed transit network. And, finally, without a well-defined transit network, the pubic is hindered from developing well-informed recommendations on the preferred alternative, especially when selection of a primary mode of infrastructure improvements and investments may be made within the selection of the preferred alternative. This sparse level of detail for the transit network and transit facilities should be addressed through further development and analysis of a transit service and facility plan for the I-405 study area. At a minimum, two service plans for bus rapid transit (BRT) alternatives, coordinated with a cross-lake HCT system, should be developed and analyzed in an effort that should be led by Metro Transit Planning staff. The two BRT service plans should be: 1) a primarily freeway HOV lane-based BRT system; and 2) a primarily arterial-based BRT system (see Section 2.5.4 of this report for more detail on an arterial-based BRT system). The I-405 DEIS and its supporting reports should document the routing and service plans used for the analysis. The BRT systems should then lead to the development of capital projects that would effectively support those service concepts. Through that analysis and disclosure, a preferred transit service concept and supporting capital projects could be made and included within the I-405 Corridor's preferred alternative.	As noted above, WSDOT has been working throughout the study process with the transit operators, including Sound Transit, King County, and Community Transit, to develop and refine the transit component of each alternative. A range of transit technologies and service levels was explored and evaluated as part of the alternatives analysis. The transit component of the Preferred Alternative will continue to be refined during the next several months as part of a more detailed implementation plan. The transit implementation plan is outside of the programmatic FEIS process. We agree that this is an ongoing process. The bus rapid transit (BRT) component did focus on the I-405 freeway corridor; however, the system connects to major activity centers via the arterial system. King County has been considering BRT/transit priority treatments throughout the County and it may be appropriate to include additional recommended elements in the Preferred Alternative. WSDOT and Sound Transit have been coordinating with King County and Community Transit on the transit component.
L52	O	11	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.2.3 Lack of Supporting Data Within the DEIS and its supporting documents, some data is supplied for only one or two alternatives and is ignored or omitted for the others. For example, the draft Transportation Expertise Report includes a chart and table (Figure 4-15 and Table 4-3, respectively) that display mode split data for the No Action Alternative, but no companion table for the build alternatives is provided, even though mode split changes are one of the study's evaluation criteria.	Comparative data are provided in Appendix H of the Transportation Expertise Report and in previous working papers. The text identifies most situations in which the impacts of a particular alternative are similar to or vary from the findings shown in a particular figure or table. The FEIS includes a detailed transportation data appendix (Appendix I) that includes all of the comparative data from the study.

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				On page 3-9 of the draft Transportation Expertise Report, it is asserted that, "If one calculates an average 'volume per lane' within the [I-405] corridor, it shows that I-405 is consistently used at a similar level of demand throughout the corridor." While this general result is cited in numerous locations elsewhere in the report (e.g., page 3-19) and the DEIS, the base information (lane capacity and volume) is not provided, nor is the results of the calculation provided. Without underlying and supporting data, it is difficult for the general public to fully understand the impacts associated with the alternatives and it is difficult for them to make an informed judgement as to the preferred alternative. Areas of the DEIS where data is missing or where data is referenced but not provided should be corrected by WSDOT.	
L52	PPA	1	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.2.4 Information on the Preliminary Preferred Alternative is Missing Prior to publication of the DEIS, WSDOT and the various oversight committees for the I-405 project were developing a Preliminary Preferred Alternative (PPA). Several project committee meetings had agenda items devoted to discussing the PPA. The core of the PPA at that time was Alternative 3, with various proposed refinements under discussion. Prior to publication of the DEIS, WSDOT staff indicated that the DEIS would identify the PPA. However, at a meeting in July 2001, shortly before the DEIS was actually published, we were informed by WSDOT staff that WSDOT had decided to eliminate reference to the PPA from the DEIS.	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. All alternatives are under consideration. The discipline studies and expertise reports were underway prior to consideration of the preliminary preferred alternative, and the preliminary preferred alternative had no influence over the methodology or findings. In January 2001, the Executive Committee for the I-405 Corridor Program recommended a preliminary preferred alternative that represented the committee's then current thinking on the direction of the program. It was the result of a non-binding polling of the Executive Committee based on information provided in the available expertise reports and preliminary feedback from the Steering Committee and Citizens Committee. Also, please refer to the response to comment L51.O-6.

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				Sensible Solutions for I-405 did not support the development of the PPA prior to publication of the DEIS, because that process called into question both the objectivity of the DEIS itself and the objectivity of the decision-making process that would be employed to develop and adopt a final preferred alternative. We feel that the preferred alternative should only be adopted once all of the information on all of the foreseeable significant impacts for all promising alternatives are disclosed to the public and decision makers and only after the public comment period has closed. Expending staff and oversight committee resources on the development of the PPA prior to the publication of the DEIS could, in the best case, divert resources from the task at hand, which should have been the timely publication of a comprehensive and accurate DEIS, and, in the worst case, it could prejudice the preferred alternative selection process by forming and solidifying preferences in committee members' minds prior to receiving complete information and public comment. That said, once the WSDOT and the project initiated the development and adoption of the PPA, then we feel that WSDOT should have disclosed that process and its results to date within the DEIS, so that the public would have complete information about the project and the decision-making process. § 1502.14(e) CFR 40 prescribes that, "...agencies shall...identify the agency's preferred alternative or alternatives, if one or more exists, in the draft [environmental impact] statement...." Not surprisingly, the Citizens Advisory Committee took action at its September 13, 2001 meeting, during the public comment period and prior to the receipt of all public comment, to adopt a recommendation endorsing the PPA, with Alternative 3 at its core. This activity again calls into question the objectivity of the decision-making process giving that perspectives and positions are being solidifying prior to the receipt of the majority of public comment. In conclusion, WSDOT, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) should review the project's decision-making process. In particular, the project's oversight agencies should review the I-405 project's activities and documentation (or lack thereof) concerning the identification of a PPA, and they should develop and implement corrective measures if they find deficiencies in that process and documentation.	

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L52	O	12	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.2.5 Lack of Appropriate Level of Detail for Impacts In general, the DEIS and its supporting documents provide only a generalized description of the impacts associated with the build alternatives, and it provides relatively little detailed information that differentiates the alternatives. This is a significant flaw in the analysis and documentation because it limits the public's understanding of the alternatives and their associated impacts, and thereby limiting the public's ability to select a preferred alternative.	Please refer to the responses to comments L51.O-2 and L51.O-3.
L52	TR	4	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	DEIS Following are some examples of the lack of detail provided in the DEIS: * Congestion. The DEIS only provides very general estimates as to the effect of the build alternatives on freeway and arterial congestion. For example, in Section 3.12.4 Impacts, the impact of the alternatives on congestion levels is summarized for only eight locations along I-405 and congestion levels for all other freeways and all arterials are lumped into two categories (see Table 3.12-8). * Travel Time. Within a 30-mile corridor, the DEIS limits the travel time analysis to six point-to-point pairs and only nine unique points (see Table 3.12-4). The point-to-point data is supplemented with average travel speeds, but those data are limited to three categories: all of I_405; all of the trips taken within the study area; and, all trips taken within the region (see Table 3.12-10). * Person and Vehicle Demand. The DEIS limits the disclosure of person and vehicle demand to nine or fewer points for I-405 and to three screenlines for all of the corridor's arterials. No data is provided specifically for freeways or arterials that connect to I-405. Transportation Expertise Report Following are some examples of the lack of detail provided in the Transportation Expertise Report: * Congestion. While the Transportation Expertise Report provides more detail on the congestion impacts than the DEIS does, this additional detail is generally limited to the same locations as is found in the DEIS. The same eight segments on I-405 are reported in the expertise report, and no additional detail on other freeways or arterials is provided in the expertise report.	Additional hours-of-congestion information was generated for other facilities. However, the summary information presented at the "system" level was considered by the committees to be sufficient for formulating program recommendations. The hours of congestion were developed from daily traffic forecasts combined with hourly diurnal curves along the study area facilities. This method allowed us to estimate the duration of congestion that would occur under each of the alternatives. The data provided are consistent with the agreed evaluation criteria that were developed by the committees over a one-year period. The committees agreed that the level of information was sufficient for them to formulate system-level recommendations in the corridor. The travel time criteria provided a good picture of typical trips made within the I-405 corridor. The trips included those that would use I-405 for most of the journey along with those that would only use I-405 for a small portion of the journey. The person and vehicle demand showed representative conditions along the north, central, and south portions of the corridor. The FEIS Appendix I provides additional traffic flows for over 20 screenlines that were evaluated during the study. The information provided is consistent with the criteria agreed to by the program committees early in the study. The project team does not believe there is added value of a 'winners and losers' map in helping to make a decision on this project. The committees felt that the level of detail provided was sufficient to reveal the transportation differences among the alternatives. The programmatic nature of the analysis did not permit us to produce detailed travel data at the TAZ level.

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				* Travel Time. Similar to the DEIS, the expertise report limits the travel time analysis to six point-to-point pairs and only nine unique points (see Table 3.12-4), although more detail on the make up of the travel time between the points is provided. The point-to-point data is also supplemented in the expertise report with average travel speeds, but, again, those are limited to three categories: all of I-405; all of the trips taken within the study area; and, all trips taken within the region (see Table 3.12-10). * Person and Vehicle Demand. The expertise report also limits the disclosure of person and vehicle demand to nine or fewer points for I-405 and to three screenlines for all of the corridor's arterials. Similarly, no data is provided specifically for freeways or arterials that connect to I-405. Instead, more detail is provided on what types of trips make up the totals found along I-405 and within the three screenlines. This lack of detail is troubling given the scale of the corridor and the importance of the decisions at hand: potentially spending approximately $5 billion to $11 billion in tax dollars; selecting the majority of transportation projects that would be constructed within the Eastside over the next 15 to 20 years; deciding on the major emphasis of the Eastside's transportation focus, either a highway-based or a transit and land use-based system; and, initiating a wide spectrum of impacts on the built and natural environment. Additional detail should be provided in the current environmental process for all areas of the transportation analysis in order to facilitate the public's understanding of the impacts associated with the alternatives and to differentiate between the alternatives. This additional detailed analysis is fundamental in making both overall choices, such as the predominant mode choice and the overall scope and scale of the preferred alternative, and whether specific projects should be included in the preferred alternative. For example, congestion levels for specific connecting freeways (e.g. I-90, SR 167 and SR 520) and arterials (both north-south and east-west) should be provided. Further, WSDOT should prepare and publish maps of the region's transportation analysis zones illustrating which zones would experience increased, decreased or unchanged access under each of the alternatives. These maps, which, are often referred to as winners and losers maps, should be prepared for each of the major activity centers on the Eastside as	The level of detail included in the Draft EIS is tailored to its programmatic nature. Detailed analysis requested in the comment will be conducted at the project-level studies. For example, the programmatic analysis did not forecast individual ramp volumes or details at arterial intersections. The hours of congestion and volumes along I-405 portray an accurate picture of volume vs. capacity along the freeway corridor. Daily vehicle trips were developed along 30 screenlines within the primary and secondary study area. The 3 screenlines documented in the Draft EIS were illustrative of the results and were expanded to include peak period and person demand. Data from all of the screenlines are available in Appendix I, Transportation in the FEIS. The evaluation criteria did not include any examination of intersection conditions. Such analysis is certainly appropriate at the project-level evaluation. The air quality analysis was also performed at the system level; as such, hotspot analysis was not required.

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				well as two or three other regional activity centers (e.g., downtown Seattle, the University District, etc.). Both in-vehicle and total-weighted travel times should be reported for more point-to-point travel pairs. More detailed analysis of demand on I-405 should be published, providing detailed illustrations of projected volumes relative to proposed capacity under each alternative and throughout the length of the facility. Ramp volumes at primary interchanges should also be disclosed to facilitate the evaluation of proposed interchange improvements, including HOV and transit volumes that would use the proposed freeway HOV lane ramps. Traffic analyses for activity centers, such as Renton, Bellevue and Kirkland, should be prepared and published. Given the scale of the I-405 Corridor and the relatively large number of highways and arterials that would be impacted by the I-405 improvements, additional screenlines should be selected and analyzed. Some of those screenlines should capture north-south streets and some should capture east-west streets. Further, some screenlines should be located adjacent to and include I-405, while other screenlines should be distant from I-405. In all, the objective should be to provide a sample of screenlines so that the performance of streets within the entire corridor can be assessed. In order to achieve that objective it seems that no less than ten screenlines should be selected and reported on. And finally, a broad and representative sampling of intersections should be selected for an analysis of their level of service during the P.M. peak period. Level of service analysis at the intersection level is important because they will be inputs into the Federal requirement for hotspot analyses for the FEIS. Hotspot analysis relates to the performance of an intersection and whether it will cause a worsening in localized concentrations of carbon monoxide and to demonstrate compliance with the state implementation plan. By providing a sampling of intersections, the intersections most likely to worsen as a result of the alternatives being considered, WSDOT could demonstrate how each of the alternatives is likely to perform in the upcoming hotspot analysis, before the region has locked itself into a particular alternative.	

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L52	TR	5	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.3.1 Uniform Effect of TDM Across All Alternatives Much of the DEIS's transportation analysis is based upon the following two assertions: 1) that the same travel demand management (TDM) program is appropriate for each of the four build alternatives; and 2) that the results (e.g., increase in transit and HOV use, VMT reduction, etc.) of that TDM program would be the same independent of the alternative that it is coupled with. We believe that both of these assertions are incorrect and should be corrected, and that once the definition and analysis of the TDM is corrected, the areas of the transportation analysis in the DEIS that rely on the TDM results should be corrected.	The order of magnitude of the TDM program is appropriate for each of the alternatives, and flexibility has been built into the program so that its funding levels can be adjusted for specific TDM strategies. Estimating the impacts of a comprehensive TDM program is difficult because it cannot be modeled with the present modeling capabilities in the region.
				First, it is unreasonable to assert that the same TDM program is appropriate for each of the build alternatives given that the four alternatives differ so radically in their approach to addressing the transportation problems in the corridor. An overall transportation program that emphasizes the supply of transit services and facilities would require a significantly different TDM program than would one that emphasizes the expansion of general purpose freeway lanes.	The TDM program starts with proven strategies based on excellent local documentation (e.g., vanpooling, employer-based strategies), but also includes significant flexibility so adjustments over time can be made to ensure that it is most effective. It is likely that any varied levels of TDM (per alternative) would still fall within the range of effectivness estimated for the standardized TDM program, although emphasis on the various strategies would likely vary per alternative.
				Second, if the same TDM program were to be implemented with each of the proposed I-405 alternatives, it is even more unreasonable to assert that the TDM program would yield exactly same results under each of the four alternatives. It is clear from the DEIS that these uniform results are an assertion and are not the result of analysis or modeling. Instead, research across the county has found that the success of TDM programs (e.g., in their ability to increase transit and HOV use) is generally inversely related to the level of contemporaneous investments in general purpose roadway capacity.	The regional model cannot model the effectiveness of TDM strategies beyond what it built into it, and that is the effects of some land use strategies and limited parking pricing. Regardless, the regional model already includes relatively aggressive assumptions for transit and HOV mode shares in 2020 and 2030. It is reasonable to conclude that many of the TDM strategies included in the I-405 Corridor Program will be needed to ensure that those regional mode share assumptions are achieved. The estimated
				These errors in the analysis of the TDM program should be corrected. First, TDM programs should be developed for each of the four alternatives so that they reinforce the general approach being taken within that alternative. Second, more detailed analysis and modeling should be performed on those revised TDM programs integrated within the alternatives themselves. The results, if they are accurate, should demonstrate differences in the performance of the TDM programs across the range of alternatives.	effectiveness of the TDM program was primarily based on estimates compiled from national and local experience and research (as compiled in "The Guide to TDM for Planners" produced by WSDOT's TDM Resource Center). It is possible that differences in the estimated effectiveness for different TDM programs and their effect on the various alternatives would simply fall within the margin of error of the model output.

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L52	TR	6	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.3.2 Transit Travel Times: Current Year Compared to 2020 No Action The analysis in the DEIS asserts that there would be little if any deterioration in transit speeds within the I-405 Corridor over the next twenty years, comparing the current base year to the No Action Alternative (see Tables 3.12-6 and 3.12-7). This phenomenon is very unlikely to occur, especially given the DEIS's forecast of increased congestion on the freeways and roadways within the corridor, and given that under the No Action Alternative the transit system would continue to use that increasingly-congested street network for at least a portion of each transit trip. For example, the DEIS forecasts that a walk access transit trip from Tukwila/Sea-Tac to Redmond/Overlake in the PM peak period would take116 minutes (door to door) in both 1995 and in 2020 with the No Action alternative. Similarly, it also states that the same transit trip with park-and-ride access currently takes 103 minutes to complete and is forecast to take 102 minutes in 2020. In contrast, the DEIS forecasts that an HOV trip between the same points would increase by 3 minutes by 2020. If the HOV trip will increase by three minutes then the transit trip, which would use the same HOV lanes, should also increase by three minutes. The similarities of transit travel times between the current year and the No Action Alternative could be an indicator that the inputs into the modeling effort or components of the travel demand model itself contain some errors. These and other counter-intuitive results should be evaluated and investigated in detail because they are foundational to all of the transportation and cost effectiveness analysis included in the DEIS. And, without a high level of confidence in the travel demand forecasting results, many of the estimated environmental impacts for all of the alternatives come into question and selection of a preferred alternative may be clouded.	The I-405 Corridor, in the period from 1995 to 2020 is expected to undergo considerable expansion of HOV lanes and direct access connections even with the No Action alternative. These HOV facilities will improve transit speeds. These improved transit speeds will be maintained to 2020 by management of the HOV lanes. For some trips, however, these improved transit speeds (as compared to 1995) on HOV facilities will be matched by decreased speeds on an increasingly congested street network, resulting in declines in point-to-point travel times for the trips. In addition, changes in transit travel time between 1995 and 2020 reflect not only changes in in-vehicle running times, but may also reflect changes in average wait times because of changes in transit lines and headways. The 2020 No Action network, for example, included Sound Transit Regional Express routes that weren't in place in 1995.

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L52	LU	1	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.3.3 Land Use Impacts and the Effect of Additional Freeway Capacity on Sprawl Our review of the DEIS has found that several aspects of the DEIS's analysis of land use impacts are questionable or deficient. First, on page 3.23-31 of the DEIS, it is asserted that, "Alternative 3, when compared to the No Action Alternative,...may result in lessening of growth pressures on lands outside the UGA [Urban Growth Area]." However, we have found that the DEIS results, which are only displayed as maps in the DEIS (so the baseline data is not generally available), do not demonstrate the quoted conclusion. Instead, Figures 3.23-10 and 2.23-11 illustrate a mixed bag of changes in land use distribution throughout the region. The two figures illustrate a general lessening of demand for housing and employment west of Lake Washington, both in rural areas and in almost all areas of Seattle, the region's primary source and areas of highest densities of employment and housing. Further, the maps demonstrate an increase in residential and employment demand East of Lake Washington, both in established employment centers and in rural areas on the fringe of the UGA. It is the increased demand for housing and employment in the rural areas that draws a causal link between the increased freeway capacity in Alternative 3 and increased pressure in East King County for sprawl outside of the UGA. Most importantly, these maps do not support the conclusions stated in the DEIS that: 1) Alternative 3 may lessen the pressure for development to sprawl into fringe rural land; or 2) the expected changes in land use distribution are too small to warrant travel demand forecasts that reflect those changes. In fact, they provide evidence that significant increases in capacity on I-405 would caused increased sprawl in the fringe rural land just outside of the UGA.	The text of the Final EIS clarifies and demonstrates the conclusions. A set of detailed tables showing the changes by forecast analysis zone (FAZ) areas and by city is provided in the Final EIS, Section 3.23 (Tables 3.23-4, 3.23-6, 3.23-8, and 3.23-10), to clarify the modeling results of employment and households. It should be noted that the growth is projected by PSRC, and directed specifically by the county and city planning agencies. Those agencies have adopted comprehensive plans that direct growth within the UGA. Alternative 3 (which is similar to the Preferred Alternative) provides the best opportunity for the regional and local jurisdictions to provide accessibility and foster their planned growth. It is important to note that the I-405 Corridor Program is not the regional or local land use implementation authority; that is the responsibility of the counties and cities through their own comprehensive plans.

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L52	LU	2	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	Further, we feel that the results documented in the DEIS and supporting reports significantly understate the impact that significant increases of general purpose lane capacity on I-405 (most predominantly with Alternatives 3 and 4) would have on the development of land on the fringe of the UGA, resulting in increased sprawl in East King County. Research across the country on the linkage between land use development patterns and trends and transportation infrastructure improvements has demonstrated time after time that increasing the general purpose capacity of a freeway can, and most likely will, lead to increased sprawl, especially where other factors are precipitating growth within a region. As an example, following are several findings from the Regional Transportation Plan Update process undertaken by Metro in Portland, Oregon, that run counter to the assertions made in the I-405 DEIS: * Though adding road capacity decreases congestion, it also attracts 'latent demand" in many areas, such that more capacity is needed to absorb new demand. * Reduced congestion encourages longer trips, thus increasing development pressure along the urban fringe and in neighbor communities. * Reduced congestion encourages more driving on a per-capita basis through longer and more frequent trips. * Congestion on the motor vehicle system does not significantly limit access to the central city or regional centers. * Relieving congestion through adding capacity is very expensive. (Source: Metro; Draft Alternatives Analysis Findings; December 9, 1997; page 9)	The Final EIS does not understate the impact of the land use changes, which are discussed in each alternative. The increase of general purpose lanes is not the sole improvement in the I-405 Corridor Program and therefore cannot be held out as the only element for improvements generating potential impacts. The I-405 Corridor Program as a whole provides a multimodal approach, which supports the Urban Centers, and not necessarily growth to the fringes of the UGA. The results related to change in pressures on growth in the I-405 Corridor Program alternatives vary by alternative, as spelled out in the Final EIS. The No Action Alternative and Alternative 4 have the potential for some impacts outside of the UGA, which makes them less attractive as viable alternatives and are less consistent with the relevant regional policies to focus growth inside the UGA.

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				In addition, Metro's detailed analysis of changes in the accessibility of jobs to housing found that the addition of urban freeway capacity had the greatest impact on the percent change in accessibility to the urban fringe, the area immediately outside of the urban growth boundary, thus providing additional pressure for sprawl. Further, in Transportation Corridor Management: Are We Linking Transportation and Land Use Yet?, Daniel Carlson and Don Billen (1996) note that an emphasis on highway development "has lead to endless hours and miles of stop-and-go congestion, the demise of many towns and disinvestment in many cities, sprawling metropolises and enormous 'edge cities.' In short, the highway era has resulted in auto-oriented development that inadequately serves the car, its driver, or the communities it attempts to connect." Are the anticipated changes in land use that would result from a major widening of I-405 significant? And would they tend to occur as sprawling development both inside and outside the UGA? Yes and yes. First, Cambridge Systematics found that development that was induced by the expansion of a highway tended to be inaccessible by non-automobile modes, and thus resulted in increased dependence upon automobiles and an increase in vehicle trips per development unit (The LUTRAQ Alternative/Analysis of Alternatives; 1000 Friends of Oregon; October 1992). Therefore, much of the development that would be attracted to the I-405 Corridor under Alternative 3 would likely be automobile-oriented in nature and it would be difficult to achieve an acceptable transit mode split to those types of developments. Second, while Washington has statewide land use laws that are intended to limit sprawl into rural areas, the addition of freeway capacity under Alternatives 3 and 4 would, as demonstrated in the Portland studies, increase developmental pressures on the rural land in East King County. With increased developmental pressure King County and/or local jurisdictions could be persuaded into prematurely expanding the UGA, and, if they followed the correct procedure, the State would have little power to reverse or limit their decisions. The costs of sprawl are also significant and identifiable. In The Costs of Sprawl – Revisited (Downs, A, et. al.; TCRP Report No. 39; Transit Cooperative Research Program; 1998), Downs identifies the known costs and impacts associated with urban sprawl.	For a general summary of consistency of alternatives, please refer to response to comment L40.LU-2. Alternative 3, which is similar to the Preferred Alternative, provides a mix of multimodal solutions with an emphasis on improving regional and local roadway capacity and other modes of transportation. Alternative 3 is consistent with the Framework Planning Policies due to the multimodal elements and meeting the objective of regional connectivity. Alternative 3 supports the Urban Centers and provides the regionally adopted transportation infrastructure that is reflected in *VISION 2020* and *Destination 2030*. The comment and citations from Portland GMA studies are interesting, but are not applicable to the multimodal approach of Alternative 3 versus a stand-alone road capacity increase. It should also be noted Portland recently reviewed their UGA boundary and did not expand the boundary, but voted to continue to focus growth in the urban centers.

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L52	CU	1	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	Finally, a minor point, on page 3.12-5 within footnote a of Table 3.12-2 of the DEIS, it states that secondary or indirect and cumulative land use impacts are discussed in Section 3.13 of the DEIS. However, Section 3.13 of the DEIS only discusses direct impacts and consistency with adopted plans. Instead, cumulative land use impacts are discussed in Section 3.23.3 Land Use, Development and Transportation in the Region and Study Area. Cumulative and indirect land use impacts are not referenced in either Section 3.12 Transportation or in Section 3.13 Land Use. Within the context of land use impacts, examples of direct impacts would be displacements and the increases in population caused by constructing and operating a facility. Indirect or secondary impacts would be changes in land use and development standards due to changes in the accessibility of property to housing and/or employment, which can indirectly lead to changes to the monetary value of property. Because the tools and methodologies necessary to complete an improved analysis of the land use impacts of the I-405 alternatives are readily available, and because land use impacts (both direct and indirect land use impacts, as well as secondary impacts resulting from the land use impacts) are at the core of the decision at hand, it is imperative that the DEIS include a more comprehensive and accurate disclosure of those impacts.	The correction is noted and the EIS has been revised for accuracy. The regional forecasts do indicate growth, and the No Action Alternative, as well, has continued growth. Therefore, yes, growth-related impacts would take place in the region whether I-405 is expanded or not. Additionally, the growth-related impacts (expansion of employment and housing) will be dealt with at the appropriate county and city level for each development through the agency's individual SEPA process and conformance with the regional accepted densities. The I-405 infrastructure will allow for movement of the regional traffic, which would take place within the urban growth boundary. Also, please see response to comment L51.CU-1.
L52	O	13	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.3.4 Induced Travel As noted in the DEIS, induced travel can come from a variety of sources, and there is not a uniform industry-wide definition of induced travel. In summary, we define induced travel as: 1) travel that occurs within a corridor as a result of new generators (housing) and/or attractors (e.g., employment, schools, retail) that would locate within the corridor as a result of the alternative; and 2) increased travel between existing generators and attactors as a result of the alternative because the alternative would reduce the cost (in time and/or money) of travel in the corridor (these could be either longer trips or wholly new trips).	Please refer to E66.SOL-1 response relating to induced travel effects.

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				Induced travel that is purely increased travel due to the reduced cost of travel is the most difficult to quantify and to understand, but it can easily be seen as a real phenomenon. When I-90 was completed, travel demand across Lake Washington increased at a much higher rate than population or employment increased. The I-405 DEIS generally quantifies induced travel as the lengthening of existing trips, but it ignores the creation of new trips as a result of lower travel time costs (see Table 3.12-2). Empirical studies by Cambridge Systematics (IDAS Progress Meeting Draft Report; June 26, 1998) and Lawrence Barr (Testing for the Significance of Induced Highway Travel Demand in Metropolitan Areas; Paper No. 00-0286 at the Annual Meeting of the Transportation Research Board; January 2000) have found that induced travel as a result of decreased highway travel times has an average elasticity of -0.4 (where elasticity is defined as the percentage change in the quantity of demand in response to a 1% change in travel time). Another study by COMSIS Corporation (Incorporating Feedback in Travel Forecasting: Methods, Pitfalls, and Common Concerns; U.S. DOT Publication No. DOT-T-96-14; March 1996) found an elasticity of -0.1 to -1.1. Even without detailed travel survey results, PSRC and WSDOT could use these and other studies to provide some estimates of induced travel demand that would result from the highway travel time savings associated with the four build alternatives. The second type of induced travel relates to changes in land use distribution and development levels as a result of the transportation investment. By understating the secondary land use impacts of a major expansion of general purpose freeway capacity (as noted in Section 2.3.3 of this report), the DEIS also understates the land use-related induced travel that would result from Alternatives 3 and 4 and the impacts (i.e., secondary impacts) that would result from that induced travel.	

Code Number			Name	Comment	Response
				On pages 3.12-4 and 3.12-5 and in Table 3.12-2, the DEIS asserts, as justification for the excluding the calculation of induced travel as a result of increased residential and non-residential development, that, "[induced] increases in residential and non-residential development (sources 1 and 2 [in Table 3.12-5]) are only likely if other conditions exist within a region to support economic development." The cited source for Table 3.12-5 and the un-cited source of the assertion (which was quoted verbatim in the DEIS from the original document but without attribution) is Patrick DeCorla-Souza, "Induced Highway Travel: Transportation Policy Implications for Congested Metropolitan Areas;" Transportation Quarterly, Volume 54, No. 2, Spring 2000, page 18. If one reads the source document further, Mr. DeCorla-Souza notes that those other conditions that support development currently exist in Seattle: "Despite increasing congestion levels, Seattle, Washington and Washington, D.C. are growing faster than St. Louis, Missouri, which has a relatively congestion-free highway system." With the high amount of undeveloped or re-developable residential and non-residential land available within the I-405 study area and on the urban fringe, and with the significant external forces driving regional population and employment increases, it is very likely that a major urban freeway expansion, which would be over 30 miles in length, would have a significant impact on the distribution of development within the wider urban area, and that those changes in the development patterns would significantly effect travel patterns and impacts within the study area. Further, Mr. DeCorla-Souza cites Metro in Portland, Oregon as the source of a trip generation model that is sensitive to changes in the accessibility due to highway improvements. In using that model,	The effect of the transportation infrastructure is documented throughout the Draft EIS and the development pattern is dictated and legally controlled through the applicable county and city comprehensive plans and zoning codes. This comment ignores the legal validity of such policies and regulations – which determine where growth and what densities will take place within the UGA.

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				Metro in Portland found that urban freeways: 1) increase VMT through both longer and more frequent trips; 2) change development patterns within the urban growth boundary; and 3) create pressure for urban sprawl into fringe rural land. In his article, Mr. DeCorla-Souza concludes that "planners may not be producing the most accurate forecasts possible at the facility or corridor levels, if they do not use feedback [from the land use models] in their travel models and/or fail to adequately forecast shift in development in improved corridors (i.e., diverted development)...Shifts in land development will need to be accounted for, trip generation models will need to be made more sensitive to accessibility, and "feedback" procedures will need to be employed to ensure consistency between outputs of traffic assignment and inputs to trip distribution and mode choice." We concur with this conclusion and call upon WSDOT to supplement the travel demand forecasts with analysis that more accurately accounts for induced development inside and outside of the corridor and the resulting increases in travel demand.	
L52	O	14	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.3.5 Data Errors in Tables Other data in the DEIS and supporting documents manifest what appear to be simple errors in calculations but that hinder the evaluation of alternatives. For example, in Table 3.12-8 1999 and 2020 No Action hours of traffic congestion on I-405 at NE 85th Street to NE 124th Street is shown as five hours and nine hours, respectively, a four hour difference. However, in the same table it calculates the difference in hours of congestion from 1999 to 2020 (No Action Alternative) as being zero. A further inconsistency with the same data occurs in the draft Transportation Expertise Report, where the No Action Alternative has five hours of congestion and Alternative 2 has eight hours of congestion, resulting in the erroneous difference of one additional hour of congestion. Similar errors also occur in Table 4-43 of the draft Transportation Expertise Report. Without accuracy in the reported data it is difficult for the public to rely on the DEIS as providing accurate documentation of the impacts associated with the alternatives. Therefore, the DEIS and its supporting documents should be proofed and double checked for errors	Thank you for identifying some inconsistencies in the data presented in certain tables. We have reconciled these differences within the FEIS.

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L52	N	1	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	Construction-Related Noise Impacts First, the DEIS's assessment of noise impacts due to construction is inadequate and often-times simply wrong. On page 3.2-10 of Section 3.2.4.2 Alternative 1: HCT/TDM Emphasis, the DEIS states that, "Construction noise [under Alternative 1] would be intermittent, occurring seasonally during an approximately two-year construction period.." Later, in Section 3.2.4.4 Alternative 3: Mixed Mode Emphasis, the DEIS states that, "Construction impacts under Alternative 3 would be similar to Alternatives 1 and 2. There would be more construction noise associated with construction of additional roadway capacity in the I-405 corridor under Alternative 3 than Alternatives 1 and 2; however, there would be no fixed-guideway HCT construction." This construction-related noise impact analysis is both inadequate and misleading.	The I-405 Corridor Program Preferred Alternative consists of nearly 100 projects over a 224 square mile region. Under Alternative 1, a majority of the projects, other than construction of HCT, would be of relatively short duration. Noise impacts from construction would primarily impact receptors in close proximity to where the construction occurs. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.
				It is virtually impossible that any capital project construction program costing approximately $5 billion to $11 billion could be concluded within a two-year construction program, either on a seasonal basis, as stated in the DEIS, or continuously throughout the year, which would be a much more likely construction scenario for a project of this magnitude. Instead, construction for any of the four build alternatives would take a decade or more to complete. In Section 2.2.6 General Cost Estimates and Schedule of the Action Alternatives, the DEIS states that, "Based on starting engineering work in July 2001 and pursuing completion on a fast-track schedule, it is estimated that final construction on I-405 [under Alternative 3] would be completed by year 2018. Alternatives 1 and 2 could potentially be completed a few years earlier, and Alternative 4 up to five years later" (page 2-16).	Although it could take many years to complete construction of all the projects listed in the I-405 Corridor Program, specific projects can be completed more quickly and their noise impacts will be limited. For example, construction of a specific park-and-ride lot can be accomplished in one construction season and will only have noise impacts within the area it is built. Major project segments, such as adding lanes to a portion of I-405, may take up to five years to construct. However, noise impacts will still be concentrated in the area of construction.
				While Section 2.2.6 is based upon an accelerated construction schedule, the noise analysis in Section 3.2.4 appears to be based upon a standard seasonal construction schedule, and Section 3.2.4 never acknowledges that a more aggressive construction schedule, that could effect construction-related noise impacts, is either a likely or even a possible scenario.	An accelerated construction schedule would likely result in increased noise during construction, but an overall shorter duration of disturbance.

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				The most significant tradeoff that may compel the project to adopt a program of construction that would include substantial nighttime construction activities would be that of project financing and inflation. Time is money, and nowhere more so than in construction. It is very likely that the project would employ cost saving measures that include condensed construction schedules intended to limit the impact of inflation on the project's total cost. One of the most common methods of compressing construction schedules is to increase the number of hours of construction activity during the day and/or week. Alternatives 3 and 4, with their longer construction schedules, would be more likely to adopt construction schedules predicated on nighttime construction, and would, therefore, have significantly more construction-related noise impacts, impacts that are not disclosed in the DEIS. Another likely and foreseeable trade-offs associated with construction-generated noise impacts, especially on I-405 and SR 167, is the undisclosed tradeoff between limiting construction during the peak commute periods while emphasizing nighttime and weekend construction, in order to avoid construction-related congestion impacts. Section 3.12.5.1 Construction [Mitigation] notes that construction mitigation could include "restricting lane closures and construction activities that impact traffic during peak commuter hours" (page 3.12-41). However, the discussion of construction-related noise impacts does not acknowledge this contingency and its potential noise impacts. Construction noise impacts are some of the most significant short-term impacts on the human environment resulting from major highway projects and in order to make an informed decision those impacts must be thoroughly evaluated and documented. Many of the constructed-related noise impacts associated with the alternatives would differ significantly between the alternatives, either due to the location or duration of construction activities, and the DEIS does not adequately disclose those differences. The DEIS should be supplemented with additional and corrected analysis of construction-related noise impacts.	Any alternatives with major construction elements on I-405 would likely require nighttime construction. Nighttime construction noise would be minimized to the extent possible. Additional information on the potential for nighttime construction noise impacts has been added to the FEIS.

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L52	GS	1	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	Construction-Related Vibration Impacts Groundborne vibration impacts, either short or long-term, are entirely ignored by the I-405 DEIS, in spite of the fact that it is typical for transportation-project EIS's to include an assessment of groundborne vibration impacts, especially for construction activities. Construction activities that propagate groundborne vibration include pile driving, excavation and heavy equipment operation, which are all activities that would be certain to occur with any of the build alternatives. In addition, truck traffic can cause groundborne vibration both within the construction zone and on arterial and local streets used by the trucks to access the construction zone.	A general discussion of ground vibrations has been added to the Final EIS in Section 3.4.
L52	TR	7	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.3.7 Incomplete Assessment of Reliability The assessment of reliability in the DEIS has a significant omission – that of fewer or more alternative paths for similar trips. That is, a network of streets and highways tends to be more reliable overtime if there are more possible routes within that network connecting the major origin and destination pairs. One of the most disquieting aspects of the ten-lane freeway proposed in Alternative 3 is that virtually all of the Eastside's transportation eggs for north-south travel would be in one very unstable basket. With a single accident, not just three, but five lanes of anxious commuters would be stopped in their tracks, and rubber-necking drivers in the opposing lanes would likely bring the other five lanes to a crawl. In general, the suburban roadway hierarchy of neighborhood streets, feeding collectors, feeding arterials, feeding freeways is an anachronism and has been proven to increase congestion when compared to an urban or neo-urban approach of a relatively dense grid of local and arterial streets, complemented by a regional highway or freeway and a well-developed transit system, all situated within a compact, mixed-use, land use setting. In conclusion, we feel that this aspect of reliability, having all of the majority of north/south capacity increases tied to a single facility and its detrimental effect on reliability, was not adequately addressed in the DEIS and that this deficiency should be corrected.	We have adjusted the reliability analysis to acknowledge this point in Section 3.12 of the FEIS. Quantitative analysis of the identified effects was not possible given the scope of the corridor program.

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L52	TR	8	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.3.8 Diminishing Returns on Capacity Increases Current transportation analysis has indicated that there is a diminishing return on the capacity benefit received with the addition of each additional freeway or arterial lane after two to three lanes in each direction. This phenomenon is likely caused by friction from adjacent lanes and from the geometric increase in the number of lane changes that would occur with the addition of third, fourth and fifth lanes. In other words, the 100 percent increase in general purpose lanes included in the southern segment of Alternative 3 may only return a 50 or 75 percent increase in actual capacity. This issue of diminishing returns on increased freeway capacity should be evaluated further to determine whether the travel demand forecasts in the DEIS over estimate the general purpose vehicle capacity of I-405 under Alternative 3 and, if so, those forecasts should be revised.	An examination of the Highway Capacity Manual does not support the assertion in the comment. Please refer to the longer discussion in Appendix M of the Final EIS.
L52	SOL	1	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.4 Inadequate Range of Alternatives This section of our comments outlines several reasonable and promising options/alternatives that were not included in the DEIS and that Sensible Solutions for I-405 believes should be studied further and included within the preferred alternative – see Section 4.0 of this report for a detailed description of Sensible Solutions for I-405's recommended preferred alternative.	Please see responses below.
L52	TR	9	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.4.1 Transportation Demand Management The Transportation Demand Management (TDM) component of the alternatives analyzed in the DEIS are too constrained and too narrowly targeted to commuter trips. The TDM program should be re-evaluated from scratch to include a broader base of non-work trips and smaller employers. In particular, incentive-based elements of a TDM should be developed and analyzed. Further, program elements that target non-work trips and work trips with small-sized employers should be included in any TDM program. And, as noted previously, the TDM programs should be tailored to the alternative and the impacts associated with the TDM program should be modeled and should reflect the alternatives that they are coupled with.	Commuters are a strong focus of the program, including those working for smaller employers, because TDM strategies that focus on commuters are the strategies about which most is known. However, other trips will also be substantial targets. For example, 21 percent of the TDM program's budget is now targeted for land use. Incentives are a key component of many of the program's strategies, including land use, vanpooling, and parking benefits cashout.
L52	SOL	2	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.4.2 DMU Service Using the BNRR Right-of-Way A low-cost option for utilizing the BNRR right-of-way is a promising alternative that could address many of the transportation problems within the I-405 Corridor and that should be studied further. In particular, a low-cost alternative that should be developed and studied further would use diesel multiple units (DMUs), which are	Use of the existing BNSF trackage in the I-405 corridor was examined in this and previous studies, most notably the Eastside Commuter Rail Feasibility Study Technical Memorandum (prepared as part of Planning and Engineering Services for Phase II of the Regional Transit Project, by the Parsons Brinckerhoff/Kaiser Engineers Team, April 13, 1992). This report examined a different

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				self-powered, diesel rail passenger cars, to provide all-day rail passenger service on the existing BNRR tracks. In its service design concept, DMU service on the BNRR right-of-way would be more similar to light rail transit (LRT) than to commuter rail, in that the DMU train consists would be shorter, more frequent and would operate throughout the day and during evenings and weekends. DMU service would also provide service directly into activity centers and would have more patrons accessing the system by walking or transferring from buses. However, DMU service on BNRR would cost much less to implement than LRT service, because it could use much of the existing track and no electrification system would be required. Under this concept, DMU service would extend from the south near I-5, with a possible connection to a Sounder commuter rail station, and north into Woodinville. While much of the existing track could be used or rehabilitated, some improvements would need to be made, such as passing track, stations, a revenue vehicle storage, operations and maintenance facility, limited park-and-ride lots and, potentially, some new segments of track. For reference, a similar DMU service concept is being implemented on an active freight rail line (i.e., Union Pacific Railroad), between Wilsonville and Beaverton in Washington County, Oregon. That project has completed it Federal environmental process, has received state and local funding and is currently seeking Federal funding and Federal approval to advance into final design and construction. The total capital cost for the Washington County project is approximately $85 million, without the purchase of railroad right-of-way, for a 15-mile corridor.	transit service than the proposed DMU service, specifically a locomotive-hauled commuter rail service, but it identified characteristics of the BNSF trackage that would be relevant to DMU service as well. As noted in the referenced report, the current speed limits on the line from Tukwila to South Kirkland (the area studied) range from a high of 25 mph to a low of 10 mph. 10 mph limits exist in Renton and over the Wilburton trestle in Bellevue. The run time for this 15.2-mile segment was reported as 49 minutes. The segment reportedly includes 29 grade crossings, including six private drives; additional grade crossings exist north of South Kirkland to Woodinville. Further, the line is currently used for freight operations. The 1992 study assumed that exclusive use of the line could be negotiated for passenger operations during three-hour A.M. and P.M. commuter periods (with 22-minute headway, 2-way service assumed), with the line being available for exclusive freight operations at all other times. The 1992 report also concluded that the existing track and roadbed is in poor condition and would need to be replaced for implementation of the commuter service. As described in Section 3.12.4.2, a sensitivity test assuming commuter rail from Tukwila to Kirkland was conducted. It was estimated that this line's ridership would be about 2,800 per day in 2020, only about 20 percent as much as for the HCT lines examined in other alternatives. Neither I-405 nor the BNSF right-of-way provides service to the center of all activity centers in the I-405 corridor. In some locations, such as downtown Bellevue, I-405 is closer to the activity center than is the BNSF right-of-way. In other locations, such as downtown Kirkland, the BNSF is closer. One advantage of bus-based transit, such as in the Preferred Alternative, is that the buses can leave the freeway right-of-way to reach into an activity center, such as by using the Bellevue HOV direct access ramp to get to the Bellevue Transit Center. Certainly, with the expenditure of capital funds, a DMU service could be implemented in, or mostly within, the BNSF right-of-way that would be frequent and all-day. The cost, however, would not

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					be insignificant, particularly if the line were taken onto new rights-of-way in order to provide service to the primary transit focus in the corridor, downtown Bellevue. However, as noted in the comment, it might be less than the cost of LRT service. LRT service, even with the large capital expenditures associated with it, was found to be no more attractive to potential transit riders than the much less costly bus-based HCT service of the Preferred Alternative.
L52	SOL	3	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.4.3 Street-Connectivity Policies and Programs Policies and programs that would increase street connectivity in activity centers and residential areas constitute a promising alternative that could help to address identified problems in the I-405 corridor, in particular congestion and delay on the arterial street network. However, a street connectivity policy and program was not considered by WSDOT in the I-405 DEIS. WSDOT should evaluate the option of adopting street connectivity standards by PSRC and local jurisdictions and implementing a program that would help to fund projects that would increase street connectivity in activity centers and residential areas. As a reference demonstrating the efficacy of such policies and program, in May 1997, Metro in Portland, Oregon, conducted a street connectivity study and found that when connections in the local street network are increased that: congestion and intersection approach queues are reduced on adjacent arterials; transit, pedestrian and bicycle mode share increases; and that methods can be implemented that eliminate or minimize cut-though traffic. The results of the study prompted Metro to adopt regional standards for street connectivity through its Regional Transportation Plan (August 2000; pages 6-13 to 6-16).	Thank you for your suggestion. The alternatives included a wide range of arterial improvements within the study area. Some of these included new street connections. The concept of a connectivity policy was not explicitly recommended for consideration within the I-405 alternatives. Many local agencies within the corridor have policies related to street connections.

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L52	TR	10	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.4.4 Arterial-Based Bus Rapid Transit An arterial-based bus rapid transit (BRT) system is a promising alternative that could address many of the problems identified in the I-405 Corridor study area and should be evaluated further. The DEIS primarily evaluated a traditional bus network, coupled with either a fixed guideway high capacity transit system and in combination with a freeway-based BRT system. In contrast, an arterial-based BRT system would emphasize fast and reliable regional connections using a system of bus routes and improvements made to the arterial street network. This type of system is currently being implemented in several North American transit systems, including Eugene, Oregon and Vancouver, British Columbia. As a reference, in Rapid Bus Development in Vancouver B.C., Glen Leicester makes the following observations about BRT service (which he terms Rapid Bus): 1) "Rapid Bus is a new way of looking at bus service;" 2) "Rapid Bus is intended to replicate many of the attributes of [HCT] using buses;" 3) "[Rapid Bus] service can be considered as a stepping stone the development of [HCT]...in medium density corridors where investment in [HCT] is not justified due to costs and ridership;" 4) "Rapid Bus service is intended to offer...fast, frequent and reliable service. The service combines transit priority measures, improved customer information and facilities, frequent and reliable service...[and] will operate on arterial streets and [regional] highways;" and 5) "Because Rapid Bus is an urban service, it is not suitable for freeway or expressway operation."	Arterial-based bus rapid transit may be an appropriate component of bus service within parts of the I-405 Corridor study area. King County, as part of its Six-Year Development Plan for 2002 to 2007, is investigating a possible arterial BRT connection between Bellevue and Redmond. An arterial-based BRT line running the length of the I-405 corridor, however, would be impractical given the discontinuity of the arterial network in the study area. Further it would provide substantially slower travel times for long trips in the corridor than would a freeway-based BRT system.
L52	TR	11	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.4.5 Modified Level of Service Standards Page 3-18 of the draft Transportation Expertise Report notes that the standard for congestion for the analysis of I-405 is "travel speeds less than 45 miles per hour." Further, a key problem identified within the DEIS for the I-405 Corridor is the issue of concurrency, a State-mandated requirement that, in effect, limits development if the surrounding transportation infrastructure would operate at a congested level. The State mandate, however, is based upon the locally and regionally-adopted level of service standards that define congestion. A promising alternative that could address problems identified for the I-405 Corridor and that should be studied further is to conduct a cost-effectiveness analysis of the current level of service (LOS) standards within the study area to determine whether they should be amended.	A study to determine potential changes in local and state LOS standards is a good idea, but is outside the scope of the I-405 Draft EIS. We agree that meeting concurrency standards is a challenge faced by all jurisdictions within the study area.

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				For reference, Metro in Portland, Oregon, adopted revised level of service standards within its Regional Transportation Plan (August 2000) that set different standards of congestion for each of the region's freeways and regional highways, recognizing that adjacent land uses, street networks and transit services should play a key role in defining acceptable levels of service (pages 1-30 to 1-31). For most of the freeways and highways, LOS F for the first hour was found by Metro to be acceptable, and for all facilities LOS E is acceptable for the second peak hour. These modified LOS standards were also approved by the Oregon Department of Transportation.	Thank you for the suggestion.
L52	TR	12	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	2.4.6 Transit Oriented Development Program A promising alternative that could address transportation problems within the I-405 Corridor that should receive further study is a program that would provide seed money to support transit oriented developments (TODs) within activity centers located within the study area and adjacent to major transit facilities, such as the Bellevue Transit Center. The funds could be used to buy smaller parcels and assemble them into larger parcels more conducive to TODs. Further, the funds could be used to purchase developable land that could then be made available to private developers through a proposal process based upon their commitments to TOD design standards. Using the funds to sell the property below market price would help to offset the higher costs often associated with transit oriented design standards, but any receipts from sales would be returned to the fund for future use on other projects. A TOD program would help to increase transit and pedestrian mode share, a key project criteria, by helping to focus development within activity centers and adjacent to transit facilities.	Based on feedback from local jurisdictions and others, the TDM program's budget was adjusted so that 14 percent is now set aside for land use support and incentives. This could include providing seed money or a loan fund to help support transit-oriented development. When the funds for land use were significantly increased, based on various input, one thought was that seed money or a revolving fund would be set up to support transit-oriented development. This will be further developed as we work on the details with the local jurisdictions and others.
L52	TR	13	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	3.0 Critical Findings in the DEIS The purpose of this section is to outline findings in the DEIS that support our opposition to the significant increases in general purpose freeway capacity on I-405 under Alternatives 3 and 4 and that support the more modest and balanced preferred alternative being supported by Sensible Solutions for I-405, as outlined in Section 4.0 of this report.	Please see responses below.

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L52	TR	14	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	* A 30-Mile, Ten-Lane Freeway Would Lure Non-Eastside Automobile Trips Into the Corridor. The significant addition of freeway capacity along I-405 (with Alternatives 3 and 4) would entice automobile uses from outside the corridor to travel within the corridor, even though neither their trip origin or destination is located in the corridor. In other words, these improvements would be paid for by the Eastside transportation improvement project, but they would benefit non-Eastside roadways, residents and business, and the Eastside would absorb the impacts of non-Eastside travel through increased traffic and localized increases in air pollution.	Alternatives 3 and 4 would attract some traffic from other corridors to I-405. Appropriate funding for the improvements will be decided apart from the EIS process.
L52	TR	15	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	* A Major Expenditure on Freeway Capacity Would Yield Little Congestion Relief. On average, adding two general purpose lanes under Alternative 3 (a doubling of general purpose capacity) would only reduce daily congestion on I-405 by one hour compared to the more modest Alternative 2, which would increase general purpose lane miles by 50 percent with the addition of a single lane in each direction. And, Alternative 2 would only reduce average daily congestion on the freeway by one hour when compared to the No Action Alternative (see Tables 4-4, 4-18 and 4-30).	The congestion effects of improvements to I-405 will not be isolated to the freeway. While average congestion would be reduced on the I-405 facility by 1 to 2 hours, there would also be reductions in congestion on arterials and other freeways in the study area. At the same time, the action alternatives accommodate additional persons within the corridor with lower levels of congestion. Therefore, total regional vehicle and person hours of travel will decrease due to the I-405 improvements. The congestion effects include all of the roadway facilities within the study area network. These data have been made available to Sensible Solutions and are available upon request.
L52	TR	16	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	* Widening I-405 Would Decrease HOV and Transit Mode Share. The addition of general purpose lanes in Alternative 3 would actually reduce the transit and HOV mode split for that alternative to below what would occur with Alternative 1 and 2 and the No Action Alternative. For example, HOV and Transit mode split would drop from 33 percent with the No Action Alternative at the Renton screen line, compared to a 28 percent mode split with Alternatives 3 and 4 (see Figures 4-12 to 4-14 of the draft Transportation Expertise Report).	It is important to look not only at the percentage of persons by mode, but the total persons served. Alternative 3 would carry slightly higher peak period transit riders than the No Action Alternative, while HOV ridership would be about the same. The reason that the mode split percentage goes down is that a higher number of total persons are carried across the screenline. It is true, at the Renton screenline, that a higher proportion of the person growth with Alternative 3 will be in Non-HOV modes. (Refer to Table 1c in Appendix I.)

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L52	COST	1	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	* The Alternatives are Simply Too Expensive. Most of the alternatives formulated within the DEIS are too expensive and the region and the State cannot afford their monetary cost or social and environmental impacts. To provide a little perspective, just the freeway improvements included in Alternative 3 would exceed the entire cost of the Portland, Oregon metropolitan region's recently adopted Regional Transportation Plan – including freeways, highway, arterial, transit and bike/pedestrian improvements – for the next twenty years. At some point, we need to decide just what we can afford, and we may realize that much of the money that would have previously gone to building super-freeways is better spent on modest freeway and roadway improvements, transit and TDM facilities and services, improved schools, increased economic development, or simply left with taxpayers.	Projects that make up the Preferred Alternative will be implemented by publicly generated funds available through federal, state, and local agency programs. Many of these funds are earmarked for specific transportation uses and cannot be used for non-transportation programs.
L52	TR	17	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	Little Documented Congestion Relief for Parallel Arterials. While the DEIS and its supporting documents tout the benefit of decreased traffic volumes and congestion on arterials parallel to I-405, from the data presented in the DEIS, this conclusion seems to be overstated. For example, Figure 4-5 of the draft Transportation Expertise Report shows I-405 and parallel arterial volumes for the peak period at the Bothell screen line. The graphs demonstrate that demand on parallel arterials would remain almost unchanged under the No Action Alternatives and the four build alternatives, while the number of vehicles using the freeway would increase significantly in response to the additional freeway capacity under Alternatives 3 and 4.	On a system-wide basis, average congestion on arterials will decrease for Alternatives 2, 3, and 4. The FEIS shows several other arterial facilities in the Bothell area that show decreases in volumes. The particular screenline documented in the Draft EIS in Bothell included some arterials that showed very small changes in volumes. It is true that I-405 will accommodate most of the growth in travel within this portion of the study area. The three screenlines documented in the Draft EIS were chosen to be representative of conditions within the I-405 corridor. Additional screenline data are provided in Appendix I of the FEIS.
L52	SOL	4	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	4.0 Recommended Preferred Alternative The purpose of this section is to provide an outline of the components that Sensible Solutions for I-405 is recommending to be incorporated as the preferred alternative for the I-405 Corridor. These recommendations include: 1) a subset of the projects that were included in the DEIS as options within one or more of the DEIS alternatives; 2) new projects, programs and policies that were not included in the DEIS, but that are promising alternatives that would address the corridor's purpose and need statement and the corridor's transportation problems and land use opportunities; 3) and, areas of further study (e.g., the evaluation of two or more options) that should be conducted before the corridor's FEIS is completed.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3 - Mixed Mode Emphasis. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

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				These recommendations generally flow from the following goals and objectives: * Select a preferred alternative that is affordable; * Within a constrained and realistic budget, target the most severe transportation problems and select the most efficient solutions, and select projects that address the north-south movement of people and goods within the corridor; * Select options for inclusion in the preferred alternative based upon need and effectiveness, not upon geographical distribution; * Emphasize alternative transportation, demand management and land use policies and only include general capacity increases on the freeway and highway system as a last resort; * Place a high priority on maintaining and improving facilities that are a part of the identified freight network within the corridor; * Emphasize accessibility over mobility; and * Minimize impacts to the built and natural environment. Figure 1, attached, illustrates Sensible Solutions for I-405's recommended preferred alternative. Based upon the capital costs of project options included in the DEIS and based upon some cost estimates for recommend options note studied in the DEIS, this preferred alternative would cost approximately $3.1 billion for its capital improvements, plus an additional $0.5 billion for the implementation of a twenty-year TDM program and undetermined operating costs. Table 1 provides a summary of the capital costs associated with the recommended preferred alternative and Table Two, attached as Appendix A, provides a more detailed summary of the projects that comprise the recommended preferred alternative. Note that the capital costs are in current dollars and, except as noted, WSDOT's capital cost spreadsheets are the source for the capital cost estimates included in Table Two.	

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L52	SOL	5	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	4.1 Transit Improvements This section outlines Sensible Solutions for I-405's recommendations for the transit projects that should be included within the I-405 preferred alternative. Because elements of this plan would use transit buses, these recommendations are necessarily and closely tied to the recommendations relating to freeway, arterial and other roadway improvements. Further, transit use is also strongly effected by the overarching land use policies and patterns and travel demand management (TDM) programs and should, therefor, be considered within the context of the land use and TDM recommendations. (See Table One in Original Correspondence) 4.1.1 BNRR Tracks and Right-of-Way The preferred alternative should include the purchase of the BNRR right-of-way, tracks and other useful ancillary facilities (e.g., signals, structures, etc.), or, if a purchase cannot be negotiated with BNRR, it should include a long-term lease agreement with joint operation of urban passenger and freight rail service within the right-of-way. Further, the preferred alternative should include the detailed study of the following two options for the provision of passenger transit service within the BNRR right-of-way diesel multiple unit passenger train service or a busway: Diesel Multiple Unit (DMU). DMUs are self-powered passenger, diesel rail cars that can operate independently (i.e., as a single car without a separate locomotive) or coupled as a train of two or more cars. DMUs typically: have a capacity of approximately 100 passengers per car; have a design speed of 60 to 70 miles per hour; and can operate either on their exclusive right-of-way or on the same tracks as freight trains (although mixed operation with freight trains requires compliance with Federal Railroad Administration (FRA) regulations). DMUs are in revenue service throughout Europe, in Dallas, Texas (by the Dallas Area Rapid Transit Authority (DART)) and in British Columbia, Canada. DMU service is also currently being planned for joint operation on existing freight tracks between Wilsonville and Beaverton in Washington	Thank you for your suggestions. The specifics of the Sensible Solutions proposed projects have been considered by the study committees during the development of the Preferred Alternative. Several elements of this proposal are consistent with the Preferred Alternative and could become early action elements to address short term corridor needs. The Sensible Solutions proposal is embodied within major elements of the action alternatives documented in the Draft EIS; it is similar to components of Alternatives 1 and 2. The Draft EIS documents the difficulty of Alternatives 1 or 2 in meeting the identified purpose and need of the corridor program. Corridor congestion levels would not improve with Alternatives 1 or 2, while the number of persons served is the lowest of the action alternatives. In response to certain assertions, there is no evidence provided that a smaller investment program would necessarily be more cost-effective, especially over a longer time period. The 2020 travel demand is noted above. With respect to the proposed use of DMUs in the BNSF right-of-way, please note the response to comment L52.SOL-2. With respect to the proposed use of the BNSF right-of-way for a busway, the alignment and grade-crossing issues that lead to slow-speed rail operation along the BNSF track would also require solutions if the right-of-way were to be used for a busway. With the expenditure of capital funds to solve these issues and construct a busway and related facilities, bus-based HCT service could be provided along the I-405 corridor from Tukwila to Woodinville. The Preferred Alternative proposed a similar bus-based HCT service the full length of the corridor, from SeaTac to Lynnwood, using managed HOV lanes, mostly within the I-405 right-of-way. If the HOV lanes in the Preferred Alternative are managed, as planned, to maintain good operating speeds for buses and other HOVs, the transit service provided should be approximately comparable to the proposed busway at considerably less cost. With respect to the proposed arterial-based BRT system, please note the response to your comment L52.TR-10. Also, it should be

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				County, Oregon. While no DMUs that meet FRA's crash-worthiness standards for joint operation are currently available in the North American marketplace, DART's vehicles, which are rehabilitated units, meet those standards and it is likely (based upon research performed by Washington County) that over the next several years demand for DMUs in North America will lead one or more manufacturers to market FRA-approved DMUs. It is recommended that DMU service be considered and evaluated generally using the existing right-of-way and track, connecting with Sound Transit's commuter rail line (i.e., the Sounder) in the south and extending north through Renton, Bellevue, Kirkland and Woodinville. Busway. A busway is simply a roadway for buses. A busway is generally grade or barrier separated from other roadways, although at-grade crossings with general purpose roads can occur on a busway, and the busway may be separated from parallel general purpose traffic lane by either lane striping or more, predominantly, by a physical barrier. A busway can have on-line and/or off-line stations and/or park-and-ride lots, and the buses may either be diesel and/or electrical powered. The baseline recommendation (i.e., capital cost estimate) from Sensible Solutions for I-405 includes the operation of DMU service on the BNRR right-of-way. However, a busway constructed within the BNRR right-of-way should also be studied further to determine whether the additional costs and impacts associated with a busway would be justified through increased transit speed, reliability, coverage and ridership. The analysis of both of these alternatives should be conducted within the context of a broader effort to develop a long-range transit service and facility plan for the Eastside, as outlined in Section 2.2.2 of this report.	noted that even if a transit service were devised which would eliminate the need for buses to use HOV lanes and ramps on I-405 and other connecting freeways, the cost of these lanes and ramps would not be avoided, as they would still be needed for use by non-bus HOVs.

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				Further study of all-day DMU service utilizing the existing BNRR right-of-way and track (with upgrades and modifications) is justified for the following reasons: 1) the service would use an existing and underutilized north-south transportation corridor; 2) the service would connect the major activity centers within the corridor; 3) DMU service would penetrate or closely skirt the business core of those activity centers; 4) the corridor generally would provide grade separated right for the running alignment and would provide at-grade service within mixed-traffic conditions within the activity cents, which together would provide relatively high speed mainline speeds with walk access within the activity centers; 5) DMU service is a low-cost alternative that is much more affordable and would result in fewer environmental impacts than either a major HCT facility in the same corridor or a major expansion to I-405 itself; and, 6) the trunk line DMU service could be easily scaled to meet demand, by adding additional service and through the strategic location of passing track, and when demand outstrips the operating capacity of single-track DMU service the corridor could be upgraded to LRT service. 4.1.2 Arterial-Based BRT System While Alternative 3 includes the sketch design and some elements of a BRT system, that BRT system would, as proposed by WSDOT, be primarily freeway based, using the HOV lanes and ramps on I-405 and other connecting freeways. Within the recommended preferred alternative developed by Sensible Solutions for I-405, the major south-north trunk service for the transit system would be provided on the BNRR right-of-way with either DMU service or a busway (see Section 4.2.1 for more detail). That grade-separated trunk service would diminish the need for trunk service utilizing the HOV lanes and ramps, and a portion of the funds targeted in Alternative 3 for HOV interchange ramps could be used to help fund the BNRR service and a complementary arterial-based BRT system.	The BRT system would include use of major arterial routes that connect to I-405. Several of these arterial routes would include transit priority treatments. This system is documented in the Preferred Alternative description of the FEIS. Please refer to previous responses relating to use of the BNSF railroad right-of-way for transit purposes.

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				An arterial-based BRT system, described in greater detail in Section 2.5.4 of this report, would use a variety of facility improvements and operating strategies to provide faster, more frequent and more reliable transit service on existing, improved or new arterials in the I-405 Corridor. The design of an arterial-based BRT system should be prepared within the context of the Eastside transit planning effort called for in Section 2.2.2 of this report. All of the capital improvements included in Alternative 3 for Transit Services and all of the park-and-ride lots called for in Alternatives 2 and 3 are included within this recommended preferred alternative. Further study of an arterial-based BRT system for the I-405 Corridor is justified for the following reasons: 1) an arterial-based BRT system would complement trunkline transit service that would utilize either the BNRR right-of-way or the I-405 HOV lanes; 2) coupled with the BNRR DMU service, an arterial-based BRT system would provide a more have lower costs and it is likely that many of the expensive freeway interchange HOV ramps could be avoided; 3) an arterial-based BRT system would reinforce development patterns in the corridor's activity centers by providing transit services on established and planned main streets and by providing a balance between speed and coverage.	We believe you are referring to Section 2.4.5, not 2.5.4. See comments above relating to the implementation of an arterial BRT system to support the trunk I-405 BRT.
L52	SOL	6	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	4.2 Freeway Improvements This section outlines the freeway elements of the recommended preferred alternative. The freeway improvements include: 1) additional capacity on the most congested portions of I-405 and SR 167, as additional general purpose lanes and/or HOV lanes; various interchange improvements on I-405; 2) limited addition of freeway to arterial HOV ramps; 3) implementation of a managed lane program on I-405 and potentially SR 167; 4) and intelligent transportation systems. Justification for this set of freeway improvements to be included in the I-405 Corridor preferred alternative include the following: 1) the capital project costs are much more affordable and fundable; 2) the projects would target and address the worst traffic problems in the corridor; 3) the environmental impacts would be significantly reduced, compared to the freeway widenings included in Alternatives 3 and 4; 4) further study could be used to determine whether the	The identified freeway improvements are included within some or all of the DEIS alternatives. The concept of a managed lane is documented in Section 3.12.4.6 of the FEIS. These suggestions are being considered as part of the phasing of the Preferred Alternative. The justifications listed are generally sound, but do not address the full purpose and need for the project. In particular, the suggested improvements would not be expected to reduce congestion to any noticeable extent. While it is also true that the specific environmental impacts might be fewer prior to application of mitigation measures, the proposal developed by Sensible Solutions also appears to present fewer corridor-wide opportunities to implement a broader environmental strategy based upon rebuilding of the I-405 corridor.

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				additional capacity should be offered as general purpose lanes or as managed lanes; 5) the package of improvements places a high priority on resolving conflicts on major truck routes; 6) the modest increases in freeway capacity would not lead to reduced transit use or increased VMT due to out-of-direction travel, as would occur with Alternative 3 and 4; 7) freeways not related to the south-north travel movements in the corridor would not be modified; and 8) the construction period and impacts would be greatly reduced, compared to the build alternatives. 4.2.1 Increased Capacity on Portions of I-405 and SR 167 Sensible Solutions for I-405 supports the addition of capacity on the most congested segments of I-405 and on SR 167 between I-405 and the county border. In general, this additional capacity on I-405 should be one lane in each direction, generally between I-5 and I-90 (and possibly north to downtown Bellevue), either as a general purpose lane or as a managed lane combined with the existing center HOV lane. The choice of either the general purpose or managed lanes should follow a detailed supplement study of the two alternatives. An additional lane in each direction on SR 167 should also be studied further to determine whether it should be a general purpose lane or as a managed lane in combination with the existing center HOV lane. In addition, general purpose auxiliary and truck climbing lanes should be added to I-405, generally south of I-90 and on heavily-congested northbound (outbound in the P.M. peak period) lanes north of SR 520. Other than SR 167, no connecting freeway capacity improvements (e.g., I-90 or SR 520) should be made as a part of the I-405 Corridor project. Instead, improvements to those facilities should be evaluated within studies specific to their corridors. In summary, when compared to the Basic I-405 Improvement Projects for Alternative 2, only projects R.BI.3, R.BI.5, R.BI.8 and R.BI.10 are excluded from the recommended alternative (see Table 2).	Thank you for your suggestions. The specifics of the Sensible Solutions proposed projects have been considered by the study committees during the development of the Preferred Alternative. Several elements of this proposal are consistent with the Preferred Alternative and could become early action elements to address short term corridor needs. The Sensible Solutions proposal is embodied within major elements of the action alternatives documented in the Draft EIS; also, it is similar to components of Alternatives 1 and 2. The Draft EIS documents the difficulty of Alternatives 1 or 2 in meeting the identified purpose and need of the corridor program. Corridor congestion levels would not improve with Alternatives 1 or 2, while the number of persons served is the lowest of the action alternatives. In response to certain assertions, there is no evidence provided that a smaller investment program would necessarily be more cost effective, especially over a longer time period. The 2020 travel demand, as noted above, would not be fully met with the stated proposal, to the extent that it is similar in magnitude and scope to Alternatives 1 and 2. Please refer to comment E66.SOL-1 for a further discussion of the Sensible Solutions proposal.

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				Table 1, attached, identifies the project elements from the alternatives studied in the DEIS that are included within this recommendation. This smaller program of improvements to I-405 and SR 167 is justified by the following reasons: 1) a smaller program is more likely to be funded; 2) the smaller program is more cost effective, targeting the most heavily congested choke points in the system; 3) the environmental impacts of a small freeway expansion would be significantly fewer; 4) travel demand in the I-405 corridor can be better met with a balance of modest freeway improvements coupled with investments in transit and land use programs. 4.2.2 Interchange Improvements The recommended preferred alternative includes improvements to several I-405 interchanges, which are included in the DEIS as Basic I-405 Improvement Projects, referenced above in section 4.2.1 of this report. Most notably, improvements are recommended for I-405 and: SR 167 (R.BI.1 and R.FR-10), I-90/Coal Creek Parkway, and at all major truck routes (R.FR-24 using WB-20 design criteria) (see Table 1, attached).	
L52	SOL	7	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	4.2.3 HOV Interchange Ramps The recommended preferred alternative includes limited funding of ramps connecting the I-405 center HOV lanes to other freeway and arterial HOV lanes. Approximately 25% of the funding included in Alternatives 2 and 3 for these projects is recommended, reflecting the recommendation that the Eastside's transit system be based primarily on DMU (or busway) service on the BNRR right-of-way and an arterial-based BRT system. However, actual funding levels for the HOV interchange ramps and selection of specific ramps to be constructed should be determined only after the more detailed transit service plan for the Eastside is developed and following a cost effectiveness analysis is prepared for transit and HOV use of specific ramps.	Thank you for your suggestions. The DEIS documented that HOV person volumes at the major screenlines along I-405 are three to four times higher than projected transit volumes. As such, it is important to complete the HOV system in the corridor- in particular the HOV freeway-to-freeway ramps. Implementation of a BNSF-based transit system would not remove the need for these HOV facilities along I-405. Please also refer to the response for L52.SOL-6. We have noted this recommendation and have informed the local jurisdictions represented on the Executive and Steering committees. This suggestion is not part of the Preferred Alternative specific to the I-405 Corridor Program.

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				4.2.4 Managed Lanes As referenced in Section 4.2.1 of this report, Sensible Solutions for I-405 is recommending that lane capacity be added to portions of I-405 and SR 167, and that further study be conducted to determine whether that additional capacity should come as general purpose lanes or as additional HOV lanes. As an element of that effort, additional study should be prepared to determine how the HOV lanes should be managed, in particular whether non-HOV vehicles (i.e., either one or two-person automobiles or freight vehicles) should be allowed access to the lanes during peak periods for a fee or toll. As WSDOT conducts this study, it will be critical that an effective and timely public involvement program be implemented to allow citizens access to information and decision-making. Further, the study should examine alternate levels of tolling for both their impact on travel demand and on their ability to fund projects, and potentially funded project should include both projects directly related to I-405 (e.g., paying for the managed lanes themselves) or to alternate mode projects in the same corridor. 4.2.5 Intelligent Transportation Systems (ITS) This proposal includes all of the ITS projects for I-405 that are included in Alternatives 2 and 3 of the DEIS.	The Preferred Alternative includes consideration of managed lanes. The purpose of this analysis in the FEIS is to capture the environmental effects of modifying I-405 to handle a managed lane concept. Information on managed lane pricing was presented to the I-405 study committees but not included in the Preferred Alternative. Separate studies of managed lane operational feasibility are being conducted by WSDOT related to I-405 and other regional facilities. See response regarding managed lanes above. ITS elements are included in the PA.
L52	SOL	8	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	4.3 Arterial and Other Roadway Improvements This section identifies the arterial and other roadway improvements that are included in Sensible Solutions for I-405's recommended preferred alternative. Those projects include: north-south arterial improvements; arterial HOV lanes; and connectivity standards and improvements.	The Preferred Alternative includes a variety of planned arterial projects, already part of local agency comprehensive plans. In addition, the I-405 Corridor Program recommends several other arterial improvements to complement the actions recommended for the I-405 freeway. The implementation of these arterial projects will be the responsibility of the local agencies. Some of these projects will be subject to further investigation as part of the Trans-Lake Washington study and other planning efforts. The arterial HOV projects have been refined as part of the Preferred Alternative, as described in Section 3.12.4.6 of the FEIS. The assertion that the environmental impacts of the arterial projects would be significantly reduced is not accurate. Many of the environmental impacts are associated with the north-south arterials rather than the connecting (I-405) arterial improvements. Most of the connecting arterial

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				Justification for including this set of arterial and other roadway improvement project in the I-405 Corridor's preferred alternative is based upon the following: 1) the smaller set of roadway projects is more affordable and more likely to be constructed; 2) the environmental impacts associated with this set of arterial projects would be significantly reduced, compared to Alternative 3, which would substantially increase the arterial lane miles, many of which would be constructed under Alternative 3 in order to address out-of-direction travel caused by the added general purpose lanes on I-405; 3) this set of projects includes innovate approaches, such as the transit oriented development seed money and the local street connectivity standards and project funding, which could substantially reduce arterial congestion at a more affordable price.	improvements are limited to the vicinity of I-405 itself, thereby resulting in fewer environmental impacts.
				4.3.1 North-South Arterial Roadway Improvements This proposal includes some of the arterial improvements included in Alternatives 2 and 3. In selecting the arterial improvements to endorse, Sensible Solutions for I-405 emphasized those projects that would address north-south travel movements and that would likely impact demand on I-405 itself. Therefore, many projects that are well-removed from I-405 and that would have little effect on its operation or projects that address east-west travel in the study area are not included in these recommendation. Although the projects excluded from this recommendation may be justifiable as sound transportation project, projects that do not impact north-south travel or demand on I-405 should not be included in the I-405 Preferred Alternative. Instead, relatively unrelated project should be evaluated through other project development efforts. For example, projects improving access to SR 520 in Redmond could be evaluated within the context of the Trans-Lake Washington Study.	The proposed arterial improvements in your comment represent the major arterial needs in the north-south direction and are supported by the DEIS analysis. However, the other arterials not included are also important to the overall system of roadways that serve the I-405 corridor.

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				Table One, attached, provides a detailed listing of the recommended arterial projects. This list of projects should, however, be reassessed and revised within the context of the detailed Eastside transit planning effort called for in Section 4.2.1 of this report. 4.3.2 Arterial HOV Lanes This recommendation includes all of the arterial HOV lane improvements called for in Alternatives 2 and 3 of the DEIS. This list of projects should, however, be reassessed and revised within the context of the detailed Eastside transit planning effort called for in Section 4.2.1 of this report. Table One, attached, provides a detailed listing of the recommended arterial HOV lane improvements. 4.3.3 Local Street Connectivity Standards and Project Funding As noted in Section 2.5.3 of this report, this recommendation calls for the study and adoption of local street connectivity standards, which could be implemented by the PSRC, King County and/or local jurisdictions. The objective of a street connectivity program would be to increase street-to-street and/or street-to-bike/pedestrian facility connections throughout the study area in order to reduce vehicular demand and congestion on arterials and I-405 and to increase alternate mode split. Further, the connectivity and design standards should be developed in a way that cut-through travel onto neighborhood streets is avoided or minimized. Coupled with connectivity standards should be funding for projects that would improve connectivity within designated activity centers (e.g., Bellevue) and residential areas. A detailed study based upon the standards should be implemented to develop a project list of priorities. Some of these connections could be coupled with the I-405 Crossings for bikes and pedestrians included in Alternatives 2 and 3 (see also Section 4.4 of this report).	The arterial HOV projects cited are consistent with the projects analyzed in the DEIS. Thank you for your suggestion. We have noted this recommendation and have informed the local jurisdictions represented on the I-405 Corridor Program Executive and Steering committees. This suggestion is not part of the Preferred Alternative specific to the I-405 Corridor Program.
L52	SOL	9	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	4.4 Pedestrian and Bicycle Improvements All of the Pedestrian and bicycle improvements within Alternatives 2 and 3 of the DEIS are included within this recommendation.	These improvements are included in the Preferred Alternative in Section 3.12.4.6.

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L52	SOL	10	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	4.5 Freight Mobility Improvements All of the freight mobility improvements included in Alternatives 2 and 3 (with the exception of project R.FR-23, a remote area for overnight freight parking and staging) are included within this recommended preferred alternative. Projects that would include improve interchange geometrics on all major truck routes are also included in this recommendation (see also Section 4.2.2 of this report).	These improvements are included in the Preferred Alternative in 3.12.4.6.
L52	SOL	11	Leon J Skiles & Associates Agency: Sensible Solutions for I-405	4.6 Implementation The project's implementation plan is one of the most important factors that will determine how successful the I-405 effort will be at addressing the corridor's transportation problems and land use opportunities and at avoiding, minimizing and mitigating the project's impacts. Implementation is only lightly touched on in the I-405 DEIS, in the Unresolved Issues and Other Actions Likely to Be Required sections of the DEIS Summary. The DEIS only devotes four to five pages to the topic of unresolved issues and future actions, and most of that concerns regulatory and permitting requirements. The issues of funding and timing are entirely ignored, even though they are the two most critical issues that will define the success of the project. Because of the scope and scale of the proposed action and because implementation would require the coordination of funding and actions by numerous Federal, state, regional and local jurisdiction, a much more detailed implementation plan is called for to ensure that the project's goals and objectives are met and to ensure that what is selected as the locally preferred alternative is actually implemented. Without a detailed and enforceable implementation plan, current participants in the study would be relatively free to implement a particular project in the preferred alternative independent of how it should be positioned within a broader implementation schedule. Mitigation should be a key element of an implementation plan. We believe that some project elements, such as the transit and TDM measures, should be implemented first and should be viewed as mitigation measures for the larger and more impacting highway-oriented project elements. Without a mitigation plan the highway projects may be the first to advance, leaving the transit projects to languish for years or even decades. Further, the DEIS doesn't address how mitigation will actually be addressed and committed to, leaving it entirely to an undefined, future process associated with the implementation of a particular project.	To help address your comments, WSDOT has prepared and is implementing a proposed early-action environmental impact mitigation decision-making process. In addition, commitments to specific mitigation have been added throughout Chapter 3 of the Final EIS.

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				In order to develop a detailed, comprehensive and enforceable implementation plan, we recommend that WSDOT undertake a corridor refinement study. While this corridor refinement study should address specific project elements, such as the detailed Eastside transit planning effort and a re-evaluation of the arterial projects called for earlier in this report, it should also include the charge to prepare an implementation plan and schedule for the corridor. Following are the key elements that should be included in that implementation plan: * Coordinated and comprehensive schedule; * Finance plan; A plan for the development and commitment to mitigation; * An intergovernmental coordination plan and compact; and; * A contingency plan that would specify the process used to modify the implementation plan and the locally preferred alternative if significant elements of the project are eliminated, changed in their scale, delayed or significantly altered in their performance and/or impacts. While most of these recommended elements of the implementation plan are self-explanatory, we would like to highlight the need for a plan and compact for intergovernmental coordination. Throughout the DEIS, WSDOT has acknowledged that many of the proposed project elements are dependent upon the approval or cooperation of local and regional jurisdictions. We too recognize that without close cooperation, WSDOT would really only be able to implement the interstate and state highway portions of the project. Instead, it is important that the projects be implemented in an orderly and well thought-out manner, and in a manner that is understood and agreed upon by the project participants.	

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				Therefore, we recommend that WSDOT undertake a process to prepare, negotiate and execute a multilateral corridor management agreement for the I-405 Corridor and the locally preferred alternative. This agreement should address the preferred project elements, the proposed land use changes and the other elements of the corridor's implementation plan. As noted by Virginia Gunby in her June 28, 2001 draft Translake Corridor Management Agreement, the purpose of such an agreement would be to, "reconnect corridor decisions...with our region's ability to implement sustainable growth management, strong, well-planned, interconnected urban centers, a healthy environment, a strong economy, and a firm urban growth boundary. The partnership [would be] formed so that the...corridor will be collaboratively planned to be sustainable...." See Table Two in original correspondence	
L53	O	1	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	I have read the Draft Environmental Impact Statement (DEIS) and many of the preceding documents, including the corridor studies and the PSRC modeling documentation. Regarding the new travel model that was not used in the DEIS, I read: New Model Documentation, and New Model Validation, PSRC, 6/30/2001. Regarding the old travel model, used in the DEIS, I read: Current Model Documentation, PSRC, 6/30/2001, and Model Validation Report for Base Year (1995), WDOT, n.d. I read the main report from the previous corridor study, I-405 Multimodal Corridor Project: Technical Report, 4/1998. For the current corridor study, I read I-405 Corridor Program Alternatives Report, Draft, 8/2000, and I-405 Corridor Program Background Report, 8/1999. For general background, I read the 2001 Update: Metropolitan Transportation Plan, 6/2000. I prepared these comments at the request of The Transportation Choices Coalition and 1000 Friends of Washington. MY QUALIFICATIONS I have been a professor of Environmental Science and Policy at the University of California, Davis since 1971. I teach land use and environmental planning and perform research on environmental impact assessment and on transportation planning and modeling. I have published several articles and book chapters on impact assessment methods under NEPA, specifically on growth-inducing impacts and on the impacts of dams and major highways on open space lands and suburban growth.	Thank you for your comment.

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				I have also published many papers on transportation modeling and related emissions modeling. I currently operate a set of advanced travel demand models in my lab, more complete than the ones used by PSRC and in this corridor study. I also operate an integrated urban model in my lab that forecasts land use and travel changes using the most complete methods available. This model, called MEPLAN, is more sophisticated than the Dram/Empal land use model currently used by PSRC. The MEPLAN model is a market-based model that represents the development and leasing of floorspace in buildings, as well as land. It represents firms and households, who bid for building space. Prices are used to clear the land market. Dram/Empal does not explicitly represent the building stock or land or floorspace prices. It is a statistical model, not behaviorally based. I am a member of the transportation modeling advisory committee of the Sacramento Area Council of Governments (a regional transportation agency like PSRC). I was a member of a high-level, statewide policy advisory committee chaired by the Director of the California Dept. of Transportation. I was also a member of a technical advisory committee for the CalDOT Division of Planning. I review technical papers for the California Air Resources Board. I am a member of a committee of the Transportation Research Board of the National Academy of Sciences. This is the official national advisory body for USDOT. I have been an expert in lawsuits concerning highways and their impacts for the Sierra Club, the Natural Resources Defense Council, and other groups. I am quite familiar with the type of travel model run by PSRC and used in the Corridor study and DEIS, due to having reviewed similar models in California in a comparative study. I am also familiar with the Dram/Empal land use model, having reviewed its use in the Chicago region for environmental groups.	

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L53	LU	1	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	OVERVIEW OF THIS EVALUATION OF THE DEIS In general, this document is inadequate in its analyses of traffic impacts, air quality impacts, and growth-inducing impacts of the proposed alternatives for a corridor-wide strategy, particularly with regard to the highway expansion alternatives. The DEIS fails to account for the increased low-density growth, and the resultant traffic volumes and air pollution that can be expected from the substantial freeway widening in two of the alternatives (3 and 4). Specifically, the document fails to quantify or describe in meaningful detail the substantially different land development pattern that is likely to occur as a result of the freeway widening, and the secondary environmental impacts of that development. The Purpose and Needs Statement is inadequate. Also, the travel model used is completely unacceptable, scientifically. It is inaccurate to a very large degree, which we document, below. A principal defect in the DEIS is that the PSRC travel and emissions models were run on the assumption that land use patterns would be identical under any alternative. This practice (using fixed land use input tables in a travel model for both "build" and "no-build" highway scenarios) is simply incorrect from a professional standpoint and has been prohibited since 1/1/95 by the United States Environmental Protection Agency's transportation "conformity" regulations for severe ozone and CO non-attainment areas (40 CFR 51.452(b)(1), Fed. Reg. 11/24/93). Even though this regulation does not apply to the Puget Sound region, it is still evidence of good modeling practice. In addition, the population and employment locations, and resulting traffic volumes, that were used in the analysis appear to be those figures that would be expected to result if the alternatives primarily comprising highway expansion are completed. The documents do not attempt to show land use patterns or traffic volumes that could be expected in the proposed corridor if the highway were not	In addition to the responses below, see responses to comments L27.LU-2, L40.LU-2, and E66.SOL-1. The I-405 Corridor Program does describe the potential impacts to the environment and the transportation infrastructure. WSDOT is not the regional or local land use implementation authority; that is the responsibility of the counties and local cities through their own comprehensive plans and policies. Regarding the statement of an inaccurate land use model, please refer to response to comment L10.LU-1. Regarding the statement of inadequate purpose and need, please refer to response to comment L53.PN-1.

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				widened. The documents therefore fail to provide an accurate "no-build" picture of the highway corridor that could be compared to the environmental and other impacts of the "build" alternatives. In a 'no build" situation, one would expect less land development in the northern, southern, and eastern parts of the study area due to the decreased accessibility on the congested freeway and related arterials. While the analysis in Cumulative Impacts hints at this pattern, that analysis is never used in the body of the DEIS where these land use changes may have had a substantial effect on travel and emissions. Accordingly, the DEIS' analysis of impacts presents a skewed picture of impacts associated with the different alternatives, primarily by concealing adverse environmental, land use and transportation consequences that can be expected in the highway-expansion oriented alternatives. As discussed below, these issues could have been addressed by readily available techniques. The development impacts of the highway expansion alternatives were evaluated with the Dram/Empal model and these land development effects could then have been used in the travel modeling.	The No Action Alternative generally includes all of the committed and funded highway and transit capital improvement projects in the study area. These projects are expected to be implemented regardless of the I-405 Corridor Program. The No Action Alternative was structured as such to disclose the impacts and provide for meaningful comparison of alternatives. The No Action Alternative does not include overall corridor highway widening. Land use and transportation concurrency associated with the No Action Alternative is described in Section 3.23 of the Final EIS. Please refer to response to comment L10.LU-1. The PSRC model indicates that a transportation infrastructure can support the regional and locally adopted growth densities within the UGA. Alternative 3 meets that objective by including transit elements and connectivity for Urban Centers. The I-405 Corridor Program also encompasses many different state and regional programs. Those programs include Sound Transit, King County buses, and the Commute Trip Reduction program elements. The difference in the land use patterns is still consistent with local planning policies and would be supported by the transportation infrastructure. The actual land use pattern is dictated by the locally adopted plans and Washington State mandated growth management policies. The I-405 Corridor Program implements infrastructure that supports the regionally designated and directed growth within the Urban Growth Area. An assumption of growth 'sprawling" into the rural areas ignores the effects of regional and local plans that direct the growth.

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L53	LU	2	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	LAND USE IMPACTS IGNORED The effects of a very substantial 30-mile freeway widening (Alternatives 3 and 4) on suburban growth are given no meaningful analysis, in terms of land use, travel, and emissions. Both the NARC report (Harvey, Greig and Deakin, Elizabeth, "A Manual of Regional Transportation Modeling Practice for Air Quality Analysis," National Association of Regional Councils, Washington, D.C., July 1993) and the Kitamura paper for the FHWA in 1994 (Kitamura, R., "The Effects of Added Transportation Capacity on Travel: A Review of Theoretical and Empirical Results," in The Effects of Added Transportation Capacity, USDOT, FHWA, Conference Proceedings, December 1991, Bethesda, MD, DOT-T-94-12) state that the land use effects of major highway capacity additions are very important and that methods exist to model these effects. These papers were the result of major nationwide official committee efforts and reflect the expert consensus today. Many agencies have developed methods for projecting the land use effects of highway additions. These methods were not employed in the DEIS and the resulting conclusions are necessarily flawed.	Please refer to responses to comments L10.LU-1 and L53.LU-1.
L53	LU	3	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	A myriad of urban histories and dozens of urban economics texts attest to the fact that greater access tends to increase the rate of land development (for example, T. Moore and P. Thorsnes, The Transportation/Land Use Connection, American Planning Assoc., 1994, ch. 2; also, National Research Council, Transportation Research Board, Transportation, Urban Form,and the Environment, Special Rept. 231, 1991, pp. 25-62). The I-405 widening will move growth to the northern and southern parts of the corridor, as well as to the East. As we state above, these land use changes were not fed into the travel model, to show the resultant changes in travel and emissions.	Please refer to response to comment L53.LU-2.

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				Indeed, the DEIS states that the construction of I-405 in the early 60s "also opened the rural, agricultural countryside east of Lake Washington to commercial and residential development" (p. 1-1). Elsewhere, the DEIS says "Land use in the study area has undergone substantial change as transportation has improved accessibility (p. 3.13-30) and, more directly "Growth has also taken place throughout the I-405 corridor due to businesses' accessibility to the transportation system and workers' accessibility to residential areas (p. 3.13-3). The current congestion on I-405, of course, shows that land development did occur in the 35 years since the facility was built. Widening the freeway will, then, permit even more development to occur in the study area and to the East. If the freeway were not widened, one would expect more development in King and Kitsap counties, to the West of the Study Area. The Cumulative Impacts analysis shows this, but these land use changes do not get used in the analysis of Impacts in the body of the DEIS. In Transportation Financing, Paper 1: The Costs of Transportation, PSRC, 1996, it is stated that residential density in the region has dropped about 30% in the last 20 years (p. 13). This indicates that the freeway building in the past has contributed to sprawl land development. In the I-405 Corridor Program, Analysis of Unconstrained Demand, WDOT, 2/2000, it is stated that "The transportation system is an important determinant of land use patterns and the choices people make regarding where they work and shop" (p. 6). This means land development responds to new facilities, which speed up travel. So, we need to use a land use model to show these effects. Otherwise, the study underprojects VMT in the road scenarios (Alternatives 3 and 4) and so is both inaccurate and biased against transit.	There are many factors that contribute to density, including employment, zoning, housing, and travel time, all of which are dealt with in the I-405 Corridor by the GMA and locally adopted comprehensive plans. The reference to a decrease in residential densities over the last 20 years in the PSRC "Cost of Transportation" (1996) actually reinforces the need for a transportation system to provide infrastructures for the Urban Centers. The Preferred Alternative and Alternative 3 will best support the increase in residential density as called for by VISION 2020 and Destination 2030. The land use model shows the effects of increased accessibility. However, model results cannot ignore comprehensive plans which dictate where growth is allowed.

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				Additional outside published sources for these views include: Kelly, Damian, The Transportation Land Use Link, J. of Plng. Lit., 9:2, 1994, and, most importantly, the National Academy of Sciences official expert panel report: Transportation Research Board, Expanding Metropolitan Highways, especially chapters 5 and 6 (1995). This report says, on p. 222: "Finding 1: Additions to highway capacity that reduce the cost of travel have a decentralizing effect on urban development." Road widenings permit people to travel faster and so travel (measured in vehicle miles travelled, or "VMT") increases in corridors where such improvements are made. The faster travel encourages people to build housing and offices farther into rural areas. This, in turn, causes more travel. There are now over a dozen published papers showing that faster travel (or more lane-miles of road per capita) increases travel. A recent review of many papers is Noland, Robert B. and Lewison L. Lem. 2002. A Review of the Evidence for Induced Travel and Changes in Transportation and Environmental Policy in the U.S. and the U.K. Transp. Res.:D 7:1-26 (preprint). These empirical papers show that if you speed travel up by 10%, VMT goes up in a 20-year analysis by 5-10%.	Please refer to E66.SOL-1 response relating to induced travel effects.
L53	CU	1	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	The attempt to describe these land development impacts in the Cumulative Impacts section of the report is inadequate for two reasons. First, the analysis does not give the data on land use changes at the district level, but only gives the data at the county level. This omission disguises the significance of the changes, as they are averaged out at this larger unit of analysis. Whereas there are only four counties in the Study Area, there are several dozen transportation planning districts. One would expect to see much larger percentage changes in these smaller areas. Dram/Empal is typically run on districts, with the data then disaggregated to the transportation zone level, for feeding into the travel model. There are hundreds of zones in the Study Area, and so they represent employment and households at the neighborhood level of detail. Second, the changed land use patterns were not fed into the travel model to see what changes they bring about in travel and emissions. The DEIS authors simply concluded, without evidence, that the small changes in land uses at the county level would not cause significant changes in travel. This is not the correct method. One must take the Dram/Empal changes at the zone level and run the travel model on them, to see how large the changes in travel are.	The co-lead agencies coordinated extensively with the Puget Sound Regional Council, the region's MPO, to determine the appropriate methodology to conduct a program-level evaluation of potential effects on land use and development within the regional planning area. In part because of the enormous area encompassed by the four-county region, and because this is a programmatic EIS, it was determined that aggregation of employment and population data at the forecast analysis zone (FAZ) level would provide the most meaningful results commensurate with the corridor-wide systems definition of the alternatives. In other words, a more fine level of disaggregation would be expected to yield greater detail, but no more useable information for the public or decision-makers given the decision at hand. Section 3.23.3.5 in the I-405 Corridor Program Draft EIS identifies potential changes in employment and households throughout the study area and four-county region based on analyses conducted by the PSRC at the FAZ level. Please refer to the Draft EIS Figures numbered 3.23.4 through 3.23.13 which show the forecasted potential changes in employment and households within each FAZ for each of the alternatives. In addition, Section 3.23.3.5 has been

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				Our work with three land use model in the Sacramento, California region, including Dram/Empal, shows that small changes in numbers of employees and households at the district level can bring about substantial changes in travel, as the higher roadway speeds associated with the highway widening alternatives permit a sorting of workers and workplaces farther apart. Despite the availability of such methods, the DEIS ignores the land use impacts of the widening in its analysis of travel and emissions. In some places, the document appears to assume that any growth-related impacts would occur even if the road were not widened. Such a conclusion is not supported and is contrary to published studies. In other places, the document appears to acknowledge growth impacts, but does not attempt to quantify or detail those impacts in a way that would permit an informed analysis of their environmental consequences. As an example of disingenuous analysis, the DEIS states that secondary impacts on growth are unlikely because "a similar level of projected growth is expected to occur in the region, with or without the action alternatives" (p. 3-1). This statement begs the issue of where the growth occurs: the location and nature of new growth has major impacts on travel and emissions, fish and wildlife, and agriculture. Such impacts are entirely ignored by the DEIS. Also, in the Dram/Empal land use projections, the PSRC held the growth projections to county population totals handed down from the State (p. 3.23-12), which artificially constrains the changes in growth location. This is a method deliberately biased toward showing little change in households and employees by county, district, and zone.	expanded, and Table 3.23-1 has been added to provide in the Final EIS additional data on the forecasted quantitative change within the local jurisdictions based on the FAZ analyses. The travel forecasts for I-405 were developed using the adopted land use plans for the region. Any land use changes influenced by the I-405 alternatives were not remodeled within the traffic forecasts because the magnitude of the potential change forecasted by the DRAM/EMPAL land use model is very small. Thus, further travel modeling of land use changes would not be expected to change the relative traffic impacts of the alternatives. It would be speculative to assume a greater change in land use because this would be outside the model results, and it likely could require changes to the adopted, guiding regional and local land use plans. The regional forecasts do indicate growth, and the No Action Alternative, as well, assumes continued growth. Therefore, yes, growth-related impacts would take place in the region whether I-405 is expanded or not. Additionally, the growth-related impacts (expansion of employment and housing) are dealt with at the appropriate county and city level. The I-405 infrastructure will allow for movement of the regional traffic, which would take place within the urban growth boundary. The statement that such conclusions are not supported and contrary to published studies is difficult to respond to when the studies are not referenced. Also, please refer to the response to comments L10.LU-1 and L52.LU-1.
L53	O	2	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	By not evaluating the land development effects caused by the freeway widening, especially in Alternatives 3 and 4, the DEIS is inadequate in two respects.	Potential effects of the alternatives on land use and development are discussed in Sections 3.13, 3.14, 3.16, and 3.23 of the I-405 Corridor Program Draft EIS. Absent other identification of specific potential legal problems, it is not possible to respond further here.

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L53	PN	1	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	The Impacts section is not accurate, in terms of the No Build and the Build alternatives. Furthermore, because the No-Build analysis did not take into account the effects of higher future congestion levels in reducing the local rate of land development in the study area, the Purpose and Need analysis is inaccurate.	For clarity, the alternatives are referred to as the No Action and action alternatives. This is because the No Action Alternative contains a number of projects and other transportation improvements that are funded and approved for implementation within the next six years; it is not a no-build condition. Please refer to Section 2.2.1 of the I-405 Corridor Program Draft EIS for a discussion of the No Action Alternative. The potential congestion effects you identify could be exhibited as a result of the concurrency requirements of the Washington State Growth Management Act (GMA). These are acknowledged and discussed in Sections 3.12.1.2, 3.12.4.1, and 3.23.3 of the I-405 Corridor Program Draft EIS. The discussion of growth in population, employment, and travel demand in Section 1.2, Need for the Proposed Action, is based on data and projections developed by the Puget Sound Regional Council, the regional metropolitan planning organization. Although the potential effects of concurrency were not discussed as part of Section 1.2, this does not diminish the essential need for the program. Absent identification of specific potential problems with the impacts sections, it is not possible to respond further here.
L53	O	3	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	If the land development effects had been evaluated, there would be less traffic in the No Build case. So, the DEIS, by ignoring this effect, is biased and exaggerates traffic in the No Build case.	It would be overly speculative to attempt to model the potential effects of development moratoria within each jurisdiction if GMA-imposed concurrency limits were violated. More importantly, this assumption would not be consistent with the adopted statement of purpose for the I-405 Corridor Program, which includes accommodation of planned regional growth.
L53	TR	1	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	The changed land use patterns found with the Dram/Empal model should be entered into the transportation model and the model rerun, a simple process. Our experience running Dram/Empal, Tranus, and Meplan in the Sacramento, California region (the first comparison of urban models performed in the U.S.) showed that small changes in employment and population in counties caused large changes in travel. This is because the small changes at the county level masked much larger percentage changes at the district and zone levels, due to averaging. Changes of 1-2% at the county level aggregated changes of 2-10% at the district level and much larger percentage changes at the zone level. Furthermore, the	The changes in land use at the zonal and district level that are forecast by DRAM/EMPAL for each alternative are also not very large. The analysis was actually conducted at the district (FAZ) level, not only at the county level. Corridor and study area travel would not be expected to change significantly but there may be some significant local traffic impacts where the additional households/employment might locate given higher levels of accessibility.

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				types of employment and types of households also changed and this affects travel. Last, the workers located farther from work and people shopped farther from home when the roads were expanded in this study. The faster speeds on the freeways permitted longer trips. Total travel (VMT) changed by 2-10% in the various models (Hunt, J.D., R.A. Johnston, J. E. Abraham, C.J. Rodier, G. Garry, S. Putman, and T. de la Barra. 2001. Comparisons from the Sacramento Model Testbed. In press, Transp. Res. Record). I note that the differences in emissions across the alternatives in the DEIS are less than 5%, 3%, and 1% (CO, HC, and NOx, respectively). So, the land use effects of the various alternatives would probably be large enough to change the rankings of them on emissions.	
L53	FATE	1	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	Because the DEIS does not evaluate the land development effects of the expanded freeway, the analysis of impacts on Wildlife, Habitat, and T&E Species is inadequate.	Please see Section 3.23 of the Final EIS, which discusses relative changes in housing and employment among the alternatives and includes assessment of related resource impacts. Changes in numbers of households and employment serve as indicators of development pressure. Section 3.23.4.3 estimates cumulative impacts in terms of new impervious surface, which typically has the most adverse effect on fish and aquatic habitat.
L53	LU	4	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	The Land Use impacts section is also inaccurate. In both instances, the DEIS fails to disclose or even acknowledge significant differences between the alternatives in terms of their growth-inducing impacts. As is well accepted by highway and transporation modeling experts, it is my opinion that the highway-expansion alternatives in this DEIS could have major impacts on the process of land development in the region. New, "sprawl-type" development caused by highway expansion, in turn, will have major impacts on future demand for transportation (primarily favoring single occupancy vehicles), air quality, fish and wildlife habitat, and quality of life in the region. These impacts are not disclosed in the DEIS, rendering the document inaccurate and misleading for its purpose: to assist the public and decision makers in evaluating the environmental impacts of the different alternatives.	The I-405 Corridor Program alternatives are not "growth-inducing". The change in pressures on growth by the I-405 Corridor alternatives vary by alternative, as noted in the EIS. The No Action Alternative and Alternative 4 have the greatest level of impact outside of the UGA. Therefore they are less supportive of the regional policies by not addressing the congestion and building too much capacity. Also see comment response L53.LU-1.

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L53	TR	2	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	FUNDAMENTAL PROBLEMS WITH THE TRAVEL MODEL In the DEIS,WDOT used the old PSRC travel model, which was developed in the 1970's and is inadequate for this analysis. PSRC has had a modern travel model completed since 1998. NEPA requires that fundamentally sound methods be used and the old model is not scientifically sound, as we demonstrate, below. NEPA also requires that all available methods of analysis be used. Even though PSRC has not formally certified the new model for this region, it is available for use, technically.	The "1998" version of the PSRC model has not been released by the agency for general use, given the need for additional validation of particular steps or modules in the model. One could argue that the updated model was more complex but not necessarily more accurate since additional refinements are still needed to replicate existing travel patterns. (Note that some of these additional refinements are currently underway and the 1998 version is expected to eventually be released). In the meantime, the "official" approved version of the PSRC travel model was used for the I-405 project. This version, while one could argue that it grew out of the models first developed in the 1970s, has developed over time. Model updates and refinements were completed periodically as additional data became available, including Census Journey-to-Work and household/population data; home interview and panel surveys; on-board transit and ferry system surveys; and traffic and transit ridership counts. The region and PSRC have invested significant dollars in updating travel data, and PSRC has consistently used these data. In the context of the I-405 study, additional validation of data for the corridor and study area was done for both highway and transit. This included reviewing/updating the transit networks, revising transit assignment procedures, and making this adaptation of the PSRC model more consistent with the Sound Transit transit ridership forecasting model. While the PSRC regional model had been validated at a regional level, additional subregional screenlines were used to complete a corridor-level validation within the I-405 study area. Estimated traffic and transit volumes were within + or - 10 percent across major screenlines. This additional validation was documented in a technical memorandum prepared as part of the I-405 Corridor Program.
L53	TR	3	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	The report, Current Model Documentation, PSRC, 6/2001, shows that the travel model used in the I-405 corridor study has no separate Home-Based Shop trip purpose, uses a borrowed mode choice model, does not have land use variables in the mode choice equations, does not iterate the whole model set to convergence, and has no walk or bike modes. These are all serious deficiencies for a travel model in a complex urban region, especially one trying to	See response to comment L53.TR-2. The PSRC report entitled Current Model Validation, prepared by Cambridge Systematics, Inc., does not describe the additional validation done to adapt the PSRC model for the I-405 analysis. The additional validation for the I-405 study area is documented in a technical memorandum entitled "Model Validation Report for Base Year (1995), I-405 Corridor Improvement Program, Work Element 10.7," November 1999. In

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				achieve more efficient land use patterns and higher walk and bike mode shares. It is also revealed that the mode choice model was calibrated on a 1977 household travel survey and the trip distribution model was calibrated on a 1971 origin-destination survey. Given that the model is based on such out-of-date data, and that substantially superior methods are readily available, the DEIS' transporation modeling material is wholly inadequate. The same report shows that the travel model validates poorly to transit ridership counts by underprojecting ridership by 19%. Much larger underprojections occur in subareas of the region. The model also underprojects auto occupancy by 28%. These are fatal levels of error in a travel model and clearly show the gross inadequacy of using such an old model. Not having a mode choice submodel estimated from local survey data is not up to even standard practice in medium-sized urban regions. The report Destination 2030, PSRC, 5/3/2001 uses the old travel model and shows an absurd result (p. A 8-14), in terms of delay in Pierce Co. Delay is way too high. It also shows absurd speeds in 2030 on one facility (p. A 8-18). These outputs show that the old PSRC model does not work correctly. This is the travel model used in the DEIS. The 2001 Update: Metropolitan Transportation Plan. Baseline Technical Rept., PSRC, 6/2000, shows that the old PSRC travel model greatly overprojects trips (31%) in the PM peak period (p. 9). Projecting peak period travel accurately is critical to how a model distributes work trips and, therefore, to overall VMT projections. Again, this is evidence that the travel model used in the DEIS is inaccurate. Generally, a travel model should project regionwide trips at peak hours within about 2% of ground counts. The Travel Forecasting Methodology, Working Paper #10, WDOT, 9/1999, seems to show that the model does not converge in the trip distribution step (p. 3). No evidence is presented to show that is does. This means that the length of trips varies, each time this submodel is run, rather than the trip lengths converging to a stable value. This is a fundamental problem shared by many regional travel models. To be trusted, a travel model must be shown to converge and be stable in the trip distribution submodel.	the current version of the PSRC model, home-based shop trips are generated separately but are combined with other home-based trips at a later stage in the modeling process. Although the mode choice model coefficients were originally borrowed from elsewhere, there is a large body of research that shows that model choice model coefficients are transferable from city to city. In addition, significant analysis and validation of the PSRC's mode choice model has been conducted over time to confirm the appropriateness of the coefficients used. The updated PSRC trip generation model does generate walk and bike modes separately but they are not assigned to the network. These trips are in addition to the vehicle trips that have been analyzed as part of the I-405 alternatives analysis. The TDM/land use strategy included as part of the I-405 improvement program is aimed at reducing use of the single-occupancy vehicle and improving the environment for alternative modes, including walk and bike trips. The actual design of I-405 improvements will include accommodation for these modes. The PSRC recognizes that their model can be improved (as can all travel forecasting models) and have identified short, medium, and long-term improvements. Making the improvements takes time and money and thus improvements must necessarily be made incrementally. A contract is currently in place to implement recommended short-range improvements as identified by an outside review of their model. As part of the I-405 project, additional corridor-level model validation was completed. Particular care was taken to improve the transit ridership forecasting capabilities of the PSRC model in the I-405 study area by adding more transit network detail and implementing more realistic transit assignment procedures. For the I-405 Corridor Program DEIS, both daily and peak-period trips were forecast using a version of the PSRC model that had undergone additional validation within the study area. Some post-processing of model results was also conducted to analyze time-of-day patterns. It is a valid comment that for future years (e.g., 2020 and 2030), the PSRC model may consistently over-estimate peak-period traffic since the current model uses fixed peak-period factors based on survey data from the early 1990s.

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				The Model Validation Report for Base Year (1995), Working Paper #20, WDOT, n.d., shows that the old travel model was validated in the outdated way of only validating for screenline road volumes and transit ridership. Validation is the comparison of the model projections for the base year (1995, for this model) to observed data. Modern practice is to also validate to observed roadway speeds, since speed is so important to accurate congestion projections and to accurate emissions projections. I also see no evidence that the model was validated in sensitivity analyses for the effects of prices, travel costs, or parking costs. In sensitivity testing, one varies important parameter values, such as the price of parking or the cost of transit fares, to see if the model produces reasonable results. Mode choice cross-elasticities are not given. This is the measure of the relative attractiveness of modes, compared to each other, and is a standard check for a mode choice submodel. Finally, the original documentation of the travel model (Current Model Documentation, PSRC, 6/2001) does not give a statistical goodness-of-fit measure for the mode choice submodel, because this cannot be done on a model where the coefficients (model parameters) were borrowed from other regions. No mode choice model is scientifically valid without measures of its statistical accuracy. The New Model Documentation, PSRC, 6/2001, shows that the new travel model, completed in 1998, but not used in this DEIS, includes walk and bike modes and includes a land use variable in the mode choice models for three trip purposes (Home-Based Work, Home-Based Shop/Home-Based Other, and Non-Home-Based). So, this model will be more sensitive to the effects of land use policies on transit, walk, and bike travel. The model will use composite impedence (from all modes), which makes it more policy sensitive to transit improvements and to tolls and parking charges. The models were all estimated on local data, from the 1998 household travel surveys and so will be more accurate and robust across policy scenarios. Since this DEIS evaluates several transit types, such a modern travel model must be used for the analysis to be valid.	Thus, it would not directly account for spreading of "peak" traffic outside the three-hour peak defined for the model. Recently, PSRC has changed the peak volume-to-delay function slightly so that the more congested links spread the three-hour volumes more evenly across the three hours. As part of their short-term model improvements currently in progress, PSRC is also recalculating the fixed peak-hour coefficients using the 1999 household activity survey and developing a peak-spreading model. However, these updates will not be ready until the end of October 2002. To better capture the phenomenon of peak spreading over time as part of the I-405 Corridor Program, an analysis of the existing diurnal distribution of trips by facility was conducted and a post-processing methodology developed to analyze hours of congestion for each alternative (outside the PSRC modeling process). As PSRC improves its modeling procedures over time, these updated procedures will be incorporated into the I-405 project development process. We do not agree with this statement. Please refer to documentation on the PSRC model. Observed roadway speeds were used in the PSRC model validation step. In addition, transit speeds and travel times predicted by the model were compared to transit schedules that reflect the impact of congestion on transit operations. Actual transit fares, auto operating costs, and parking costs are all included explicitly in the model, and model validation thus takes into account their impacts on mode choice. Please see documentation on the PSRC model for these measures. The 1998 version of the PSRC model is not available for use on any corridor studies at this time. Additional work is needed before it can be used. While the model complexity has gone up, this does not mean that the model is inherently more accurate without proper calibration/validation. Thus, the PSRC has withheld release of the new version of the model until they have confidence in its ability to not only reproduce existing travel patterns but to serve as a reliable tool to predict the future as well. They currently have a model

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				Another critical flaw with the travel modeling for the DEIS is that the congestion pricing, a very important part of Alternative 1, was not modeled. Instead, the reduction in daily trips was estimated, based on earlier studies done of the whole region by PSRC (DEIS, Table 3.12-12, fn b). First, the levels of pricing (road tolls) are not identified, so the reader cannot evaluate the reasonableness of the projections. Second, regionwide projections of congestion done in an earlier study, not documented here, may not apply to this corridor. Third, the effects of the congestion pricing are only projected on daily travel, not for peak-period travel. This is absurd, as the intent of congestion pricing is to reduce peak-period travel. The DEIS (Table 3.12-12) assumes a 15% reduction in daily trips due to congestion pricing, in a conclusory fashion, with no evidence and related reasoning. No effects on peak-period travel were projected and so the effects on transit use for commuting cannot be accurately estimated. This is not scientifically acceptable practice and significantly undercuts the DEIS' utility in disclosing the travel-reduction impacts of the transit alternative (no. 1).	improvement program in place to focus on finalizing the model for future release. Very few regional models in the United States include a land use variable explicitly in the mode choice submodel. To the extent that land use patterns vary across the region, the impact of land use on mode choice is to some extent captured in the model validation process, implicitly if not explicitly. Note that the Federal Transit Administration (FTA) does not allow regions that are evaluating major transit investment in a specific corridor to vary land use by alternative. Thus land use is assumed to be "fixed" for each alternative, using the official regional forecasts developed by the metropolitan planning organization, in this case, the PSRC. However, PSRC has evaluated different transportation and land use scenarios in developing its adopted *VISION 2020* and in updating the MTP as part of *Destination 2030*. The congestion pricing assumptions in Alternative 1 are listed on Section 3.12.4.2. The purpose of the analysis was to determine what the potential effect of a 'regional' pricing strategy would have on I-405 corridor, not to evaluate a corridor pricing strategy. The regional pricing scenario described was equivalent to an increase of $0.20 to $0.25 per mile across all facilities. The analysis of a toll road was documented as part of Alternative 4. We relied upon the PSRC regional pricing studies, which provided the results cited. We acknowledge that there would be greater effects during peak periods, and have modified the section accordingly. Additional regional pricing modeling will likely be conducted by the PSRC. That is the most appropriate venue for conducting detailed modeling of this sort, rather than as part of a corridor program. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.

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L53	PN	2	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	PURPOSE AND NEED SECTION IS INADEQUATE Destination 2030, PSRC, 5/3/2001 (p. A 8-4) shows that daily delay per household in 1998 is 6.4 minutes. This is hardly a congestion crisis, especially considering the very low value of time implied by behavior in the region (high percent of nonwork trips in the peak periods). I note the recent work by Pat Mokhtarian at the University of California at Davis showing that commuters prefer an average commute trip time of 16 minutes in the U.S. Delay in the Current Law Revenue 2010 (No Build) alternative only rises by 4 minutes, again, hardly a crisis. If one were to calculate capital and operations expenditures for the new road capacity per hour of delay reduction across the alternatives in the I-405 process, we would see how expensive capacity additions are. In Table 3.12-3, section B., note that the hours of delay on I-405 do not increase over the 1995 base year value in the No Build alternative or in the transit-heavy alternative (no. 1). This indicates that congestion does not get much worse in this corridor, even if we build no capacity on roads or transit. This is because travelers adapt to congestion, by traveling at off-peak times and by switching to transit. This behavior has been observed for years and documented in reports in the U.S. and the U.K. Observe, also, that average Study Area speeds range only from 19 mph (in the No Build alternative) to 22 mph (in the road alternative), in spite of the very expensive efforts to add road capacity in Alternative 4. Again, this shows how travelers adapt. If we add road capacity, people travel more at peak periods and they stay in their cars. The DEIS fails to disclose this well-known phenomenon: Building a large amount of new road capacity will not reduce congestion much.	As described in Section 1.2, growth in travel demand, traffic congestion and reliability, freight mobility, and safety are issues and trends that influence the need for the proposed action. Hours of congestion, not hours of delay, was the performance measure used in this study. The average hours of congestion did not increase significantly from 1995 to 2020, although there are higher numbers of persons and vehicles caught in that congestion. The model does not capture any switching to off-peak times, a situation that might occur. The phenomenon mentioned in the comment is the subject of ongoing research and debate. Aspects of this issue are described in the response to E66.SOL-1 on induced travel.
L53	TR	4	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	The chief objective in this study is "mobility" (p. 1-2), which is too narrow and an incorrect objective scientifically. A more appropriate objective is "accessibility," which is used by PSRC in their Metropolitan Transportation Plan and Vision documents. The distinction is critical. Mobility means more travel, which leads to valuing travel per se and wanting more VMT. This is incorrect,	The use of the term mobility was defined quite broadly within the study. We disagree that mobility means more travel, but would argue that the broader definition of mobility encompasses the 'accessibility' definition mentioned in the comment. Improving accessibility (as defined) is consistent with several of the criteria used in the study.

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				scientifically, since travel is mostly a derived demand. That is, people don't want to travel much, per se, but do so mainly to get to activities. Accessibility means ease (low cost) of access to activities, including nonmotorized interzonal and intrazonal (short) trips. This mistake at the very beginning of the DEIS is very unsettling, as most Metropolitan Planning Organizations and State DOT's corrected this problem in the early 90s. This misguided focus on transportation for its own sake leads to biased evaluation measures that focus on road congestion in the Impacts section dealing with travel impacts (sec. 3.12). Project components look bad that do not decrease road congestion (Table 3.12-3), a very narrow view of user benefits in travel and one that is biased against transit. Road congestion greatly benefits transit, for example, especially exclusive ROW transit (rail, busway), and walk and bike.	Reducing congestion is a legitimate objective for this study and was the subject of extensive discussion among the committees. Several other objectives and criteria focus attention on transit, so the evaluation was certainly balanced. As a related note, road congestion per se does not benefit transit unless transit is provided a separated facility on which to operate.
L53	TR	5	Robert A Johnston Agency: Transportation Choices Coalition / 1000 Friends of Washington	Equally unsettling is the incorrect definition of congestion in the DEIS. It is defined as less than 45 mph on the Freeway (p. 1-6). It is probable that Washington State law requires congestion to be defined in the normal fashion, according to level of service (LOS) for network links and then the acceptable LOS is determined by the State DOT or by the regional and local agencies. The 45 mph definition will greatly overproject congestion. LOS is used by virtually all State DOT's as the measure of congestion.	The definition of congestion is consistent with WSDOT practice. LOS on freeways is directly tied to speeds on the facility. As used, congestion is any speed in the 0 to 45 range, with the understanding that many roadway segments and time periods would have speeds substantially lower than 45 mph.
L54	O	1	Steward and Associates Agency: Sensible Solutions Coalition	Steward & Associates prepared these comments on the I-405 Corridor DEIS under contract to the Sensible Solutions Coalition. Our scope of work included reviewing the DEIS and related documents, considering impacts to water quality and fisheries, and contributing to development of an environmentally preferred, feasible alternative. Steward and Associates is a consulting firm specializing in fishery science, natural resource assessment and Endangered Species Act response strategies. The majority of our work involves salmon and their watersheds in the Pacific Northwest. Our client base includes city and county government agencies, American Indian tribes, environmental engineering firms, non-profit organizations and private entities. We are driven by a commitment to personalized, high-quality service to our clients, and by our desire to see the rich natural heritage of our region maintained and restored for future generations. For more information about Steward and Associates, please visit our website at http://www.stewardandassociates.com/.	Thank you for your comment.

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				These comments are organized in five parts. The first part is this Executive Summary, which provides an overview of the comments. Part II reviews the Draft Environmental Impact Statement (DEIS). Part III reviews some of the Expertise Reports as they relate to fisheries and water quality. Part IV provides an environmental alternative intended to reverse the downward trend for salmon habitat and populations in the Study Area. Part V lists the references.	
L54	FATE	1	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS concludes that: None of the action alternatives would contribute substantially to altering the negative trends insalmon populations in the central Puget Sound region. Reverses in the decline of salmonid populations cannot reliably be assumed, regardless of which I-405 Corridor alternative is implemented. This conclusion fails to meet the intent of the National Environmental Policy Act and one of the purposes of the EIS. The DEIS lists several habitat restoration plans that identify means to reverse the declining trend, but makes no apparent use of this information. Restoring salmon populations to harvestable levels is the stated goal of the Tri-County ESA Response Effort, in which three of the governments in the Study Area participate. Conserving and restoring habitat for salmonids is a priority in the Growth Management Act and Shoreline Management Act, which govern all jurisdictions in the Study Area. Habitat Limiting Factors reports are available for Cedar-Lake Washington basin and Green River. The Muckleshoot Indian Tribe has a draft Lake Washington Chinook Recovery Plan. The FEIS and consequent actions should incorporate and act upon these scientifically-based plans to restore the conditions upon which salmon depend.	The alternatives minimize impacts to varying degrees as described in the EIS; however, it is not possible to completely eliminate impacts to fisheries from a program that includes hundreds of construction projects throughout a large portion of the Puget Sound urban area. Mitigation for impacts will be required at the project level through permitting such as HPA, local critical areas, and Shorelines Management Act. This project-level mitigation will help compensate for specific adverse impacts such as hydrology alterations and vegetation clearing. At the watershed, or "programmatic" level, WSDOT has developed an "Early Action Environmental Impact Mitigation" strategy. This proposal incorporates concepts from the WRIA limiting factor reports and other resources as described in the Draft Fish and Aquatic Habitat Expertise Report, and is designed to coordinate closely with the WRIA 8 "Near-Term Action Agenda." The mitigation may provide large-scale off-site projects such as preservation of intact habitat that would benefit functions of the overall watershed, while allowing for transportation needs.
L54	O	2	Steward and Associates Agency: Sensible Solutions Coalition	While making assumptions in the absence of data is often a part of analysis, the DEIS makes many assumptions when data is available. Examples include stream conditions, housing and employment density in the Study Area, and regulatory changes. These assumptions tend to favor some alternatives (particularly 3 and 4) over others (particularly 1 and 2). Using available information would provide a basis for an informed decision about means to improve the environmental conditions in the Study Area. This would also remedy the environmental objections raised by the Environmental Protection Agency including concerns about lack of information in the DEIS.	Your specific comments are addressed below. Absent other identification of specific assumptions, it is not possible to respond further here.

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L54	O	3	Steward and Associates Agency: Sensible Solutions Coalition	Some of the assumptions tend to preclude meaningful consideration of effects or alternative. For example, the DEIS assumes that, when necessary, shoreline protection and preservation, public access, and habitat enhancement can be maintained or improved as part of project development. The DEIS does not provide any information to support this assumption, which goes against the purpose of considering effects. As the attached photos of I-405 crossing the Cedar River show, current conditions do not support the assumption. The DEIS assumes a housing density of 4 units per acre although actual densities are available from comprehensive plans and other documents. This assumption is also below the level at which studies find transit use increases sharply, and may have the effect of precluding meaningful analysis and consideration of alternatives that increase transit use.	The EIS assumptions are valid for consideration of effects at the corridor or programmatic level. The shorelines that could have potential impacts are identified and general ranges of mitigations are discussed. At the project-specific stage, the design and mitigations will be determined, reviewed, and approved by the appropriate agencies.
L54	O	4	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS also tends to compare alternatives to the no action case, minimizing differences among alternatives. Alternatives 3 and 4 clearly have the most adverse direct and cumulative effects on the natural environment and salmon habitat. These are due to the greater quantity of impervious surface and the movement of population and jobs from Seattle into the Eastside. Alternative 1 in the DEIS has the fewest. The alternative the Sensible Solutions Coalition presents, under separate cover, has fewer direct and cumulative impacts than Alternative 1. Current environmental conditions are degraded to such an extent that a significant restoration effort is required for any alternative; selecting an alternative with the fewest impacts can reduce the scope and cost of that effort.	Each of the action alternatives is compared to a common measurable baseline, the No Action alternative; in addition, there are many examples within the Draft EIS where the effects of the alternatives also are compared to one another. It is not clear from your comment how this approach to presenting the data would minimize differences among the alternatives. Your assessment of the effects of Alternative 3 - Mixed Mode Emphasis, as clearly having the most adverse direct and cumulative effects on the natural environment is not supported by the findings of studies conducted for the I-405 Corridor Program EIS. Also, please refer to the response to comment E66.SOL-1.
L54	O	5	Steward and Associates Agency: Sensible Solutions Coalition	Areas of Concern and Unresolved Issues: In the Summary, the DEIS identifies Endangered Species Act and Listed Fish Species as an "Area of Concern" and Aquatic Habitat Enhancements and Stormwater Retrofit as an "Unresolved Issue." The Council on Environmental Quality's regulations implementing the National Environmental Policy Act (40 CFR 1500 and Pub. L. 91-190, 42 U.S.C. 4321 et seq, respectively) do not define or discuss "areas of concern" or "unresolved issues." The draft statement must fulfill and satisfy to the fullest extent possible the requirements established for final statements in section 102(2)(C) of NEPA (40 CFR 1502.9). The DEIS does not identify how these issues will be resolved, so the DEIS does not provide the necessary information and analysis upon which to base an informed decision about selecting an alternative.	The discussions of areas of concern and unresolved issues are included to provide the public, agencies, and decision-makers with a greater context within which to evaluate and consider the I-405 Corridor Program and alternatives. Please refer to the Unresolved Issues section in the Summary of the I-405 Corridor Program Draft EIS; the discussion there identifies when and how the issues are expected to be resolved.

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L54	O	7	Steward and Associates Agency: Sensible Solutions Coalition	Mitigation Commitments (DEIS page S-14): This section refers to Table S-2: Summary of Potential Impacts and Possible Mitigation Measures. The fact that the DEIS section on mitigation commitments refers to a table about possible measures confounds any attempt to scientifically quantify effects or verify outcomes. Furthermore, the I-405 DEIS states mitigation commitments, as stipulated in the final environmental analysis, documentation, and review document, will be incorporated into the design and construction of the proposed transportation improvements. This begs the question of the specific nature and effectiveness of the mitigation. Given the contingent nature of "possible mitigation measures," the DEIS does not provide the necessary information and analysis upon which to base an informed decision about selecting an alternative.	As discussed on page 3 – 2 of the I-405 Corridor Program Draft EIS, the lead agencies and project proponents are committed to implementing sufficient mitigation to reduce all identified adverse impacts to an insignificant level. To help address your comments, WSDOT has prepared and is implementing a proposed early-action environmental impact mitigation decision-making process. In addition, commitments to specific mitigation have been added throughout Chapter 3 of the Final EIS.
L54	O	8	Steward and Associates Agency: Sensible Solutions Coalition	The Record of Decision will have to specify an environmentally preferred alternative (40 CFR 1505.2(b)). WDOT should specify the environmentally preferred alternative as soon as possible to provide this information to decision makers and the public.	An "environmentally preferred alternative" will be identified when appropriate to do so.
L54	GS	1	Steward and Associates Agency: Sensible Solutions Coalition	Section 3.4 describes geology and soils. For the geology impacts evaluation, the basis of comparison among the alternatives is the estimated length of various transportation improvements within the most extensive geologic hazard areas and consideration of the magnitude of disturbance (DEIS 3.4-1). The DEIS does not define "most extensive" or demonstrate that less extensive hazard areas do not require consideration in order to achieve the objectives of protecting public health and safety.	"Most extensive" has been deleted from the I-405 Corridor Program Final EIS. Comparison is based on length of geohazard areas.
L54	GS	2	Steward and Associates Agency: Sensible Solutions Coalition	The primary data sources the DEIS (page 3.4-1) uses for determining the various geologic hazards include local government maps that are not necessarily adequate for the purposes of the EIS. Several of the studies are years or decades out of date, and do not reflect today's best available science. All of the USGS-sponsored papers are more recent than the government maps or regulations, and thus the maps and regulations cannot incorporate the methods, analysis, and findings within those papers. Some of the USGS-sponsored papers include discoveries of previously unknown faults in Puget Sound; this could affect the likelihood of a geologic hazard affecting public health and safety.	The geologic hazards identified from government sources were compared with the most current United States Geological Survey (USGS) maps. The hazard maps are generally as current as the geologic mapping from which they were developed. Although the geologic maps are updated over the years to take advantage of the accumulated subsurface data collected by the geotechnical and geologic community, these changes would likely be so small that they would not affect the comparison of alternatives. Site-specific subsurface information will be collected and used for design of the facilities. Recent papers concerning faults were discussed in the I-405 Corridor Program Draft Soils and Geology Expertise Report, from which this I-405 Corridor Program DEIS was prepared. The impacts of the faults on the project were also discussed

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					in the expertise report. Seismic and soft-ground hazard areas are independent of the potential magnitude of ground shaking during an earthquake; as a result, they will not change with better definition of the location of the Seattle Fault or South Whidbey Fault.
L54	GS	3	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS (Section 3.4.2 Methodology) uses "a subjective rating … for the general impacts of construction through potential geologic hazards, with each geologic hazard rated high, medium, or low in terms of the potential environmental impact caused by the transportation construction in general." Absent an explanation of the basis for the rating, the reader or decisionmaker has no basis to evaluate the methods that support the rating or accept the findings.	The basis for the ratings was not clearly translated from the I-405 Corridor Program Draft Soils and Geology Expertise Report to the I-405 Corridor Program DEIS. A revised explanation and description of the threshold for a significant impact has been added to Section 3.4.2, Methodology, of the Final EIS.
L54	GS	4	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS (section 3.4.3.3) does not include a detailed description of the soil types, while stating that many of the soils along the existing state highways and arterials have been modified by construction activities. This inappropriately omits the areas where previous construction has not modified the soils. The DEIS should provide criteria for evaluating all soil suitability.	There is no available, accurate mapping of surface soils that would be suitable for the comparison required of this programmatic EIS. Soil suitability will be evaluated during future project-level environmental analysis, documentation, and review.
L54	GS	6	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS, Section 3.4.3.4 provides little information on the extent and potential impact of mining and transporting gravel necessary for road construction. As these activities will mostly occur in sub-basins outside the I-405 Study Area, the DEIS should explicitly consider their effects and identify suitable measures to avoid, minimize, and mitigate for effects of gravel mining. Many existing gravel mining operations started before current environmental requirements, and are not subject to regulations that adequately protect salmon and water quality. Gravel extraction affects geomorphology and sediment transport, hydrology, thermal energy transfer and stream temperature, nutrients and pollutants, physical habitat structure, and stream biota, including salmonids (NMFS 1999a, Spence et al. 1996). The potential impacts should be viewed from an ecosystem perspective; that is, considered in relation to other disturbances acting over the entire watershed. Since the amount of gravel required is substantial for a single project, the EIS should fully consider the impacts associated with gravel extraction, processing, and transportation.	Gravel mining can be minimized by reusing gravel materials within the project limits (e.g., recycling pavement and concrete debris), but this minimization cannot be mandated until the project reaches the design level because recycling may have adverse effects (e.g., dust and noise). Gravel from imported sources outside of the study area will be required. Standard Washington State Department of Transportation (WSDOT) contract language requires imported materials to come from approved sources whose operations comply with all applicable laws. Construction timing and location of potential gravel sources will be identified and evaluated in greater detail when they are known during future project-level environmental analysis, documentation, and review.

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				If gravel is mined in active floodplain areas without appropriate safeguards, the hydrology, hydraulics, morphology, sediment transport, substrate composition and stability, pool/riffle structure, instream roughness elements (large woody debris, boulders, etc.), riparian zone, and temperature of associated watercourses could be affected (Spence et al. 1996). These effects are often propagated significant distances downstream and, in some cases, in the upstream direction. (Spence et al. 1996) Changes in the physical environment can adversely affect instream biota and the associated riparian habitat (Sandecki 1989). Modification of the riparian zone, including stream banks and associated vegetation, would have multiple deleterious effects on aquatic and riparian-dependent terrestrial organisms. Disturbance of riparian areas can lead to increased erosion, sediment and nutrient inputs, and water temperatures. Streambed erosion caused by altered water and sediment regimes can cause significant mortality of salmonid eggs and alevins. Excess siltation can choke salmon redds, leading to poor incubation survival (Pauley et al. 1989). Other potential impacts to anadromous fish populations include reduced growth and survival, altered behavior, shifts in age distribution, species replacement, and altered predator-prey interactions (Moulton, 1980).	
L54	GS	7	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS does not provide enough information about the nature and adequacy of local government regulations to protect steep slopes, prevent mass wasting, and avoid hazardous areas. The DEIS (page 3.4-4) notes that "[s]ome jurisdictions (King County, Bothell, and Newcastle) have regulations governing steep slope hazards," without discussing the jurisdictions that do not have such regulations or the adequacy of the regulations. Thus, the DEIS look at only some jurisdictions in the study area, and omits the jurisdictions in Snohomish County and those that define hazards some other way or not at all. Furthermore, the DEIS does not include any demonstration that this level of protection is adequate. The fact that the jurisdictions within the study area inside of King County "generally" define landslide hazards as "any slopes steeper than 40 percent or slopes of 15 percent or more that also have interbedded sand and silt or clay, springs or seeps, landslide deposits or other indications of past landslides, or show signs of	For planning and broad-based screening purposes, various political jurisdictions have developed their own regulations and maps based on the direction of the State Growth Management Act. The actual differences between the definitions of geologic hazards by the various jurisdictions are relatively minor. The EIS has relied on the hazard maps of the local jurisdictions, where available, to show the locations of these hazards and checked these maps against geologic and topographic maps in the locations of the potential proposed improvements. The actual facility design and any mitigation will not depend on the maps or regulations created by political jurisdictions for the planning process, but on the site-specific conditions and requirements to build a safe facility with minimal risk of deep-seated earth movement, shallow-soil sloughing, and erosion.

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				rapid stream downcutting or wave or bank erosion" may or may not be adequate to achieve the intended purposes. The EIS should consider both shallow landslide initiation and deep-seated landslides. The former can be accomplished by calculating debris-flow initiation potential using a coupled model for shallow throughflow convergence and slope stability that considers critical rainfall, soil transmissivity, soil friction angle, soil bulk density, density of water, contributing area draining to each area, area dimension, and ground slope (Montgomery and Dietrich 1994).	Additional geologic review and assessments of potential hazard areas will be conducted at the project level.
L54	GS	8	Steward and Associates Agency: Sensible Solutions Coalition	The consideration of impacts omits consideration of preventing mass wasting and associated sedimentation to waterways, fish, other aquatic organisms, and wildlife. Section 3.4.4 states '[I]mpacts on the geology and soils within the I-405 Corridor affected area would be considered substantial if an alternative either (1) permanently removes geologic or soil resources that are not readily available elsewhere, (2) causes a threat to public health and safety, or (3) is anticipated to involve mitigation costs that exceed the anticipated construction costs. This does not consider a wide enough range of effects, especially to aquatic systems which debris flows may adversely affect (Tang and Montgomery 1995).	Impacts to fish and other aquatic habitats, including impacts resulting from mass wasting and sedimentation, are discussed in the I-405 Corridor Program Draft Fish and Aquatic Habitat Expertise Report and in Section 3.8.4 of the Final EIS.
L54	GS	9	Steward and Associates Agency: Sensible Solutions Coalition	Section 3.4.5 refers to design solutions and best management practices (BMPs). The DEIS erroneously refers to section 3.4.6. Section 3.4.5 discusses options in a general sense. The section is subjunctive, and does not provide guidance, requirements, criteria, or thresholds for applying BMPs. The fact that King County and many local jurisdictions require use of these BMPs as part of the permitting process begs the question of what WDOT will do in those jurisdictions that have different requirements or no requirements at all. The statement '[a]dditional BMPs, especially related to construction timing, could be instituted since many of the erosion hazard areas are adjacent to or upstream from chinook salmon habitat" does not provide certainty as to what WDOT will actually do, when, where, or why.	Best management practices (BMPs) will be identified and implemented at the project level. These will meet or exceed BMPs required by affected local jurisdictions.

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L54	WR	1	Steward and Associates Agency: Sensible Solutions Coalition	Section 3.5 of the DEIS describes water resources. The plans, policies, and codes the DEIS uses for the analysis of impacts and the determination of mitigation for surface water are outdated, do not provide adequate protection of surface water and aquatic resources, and do not incorporate the best available science regarding protection and restoration of beneficial uses of surface water and aquatic resources (PSWQAT 2000, Reiser et al 2000, WCTED 1998). Using the best available sources would provide better information to consider effects, design alternatives to avoid effects, and select an alternative and mitigation program to improve the condition of surface water resources in the Study Area. Current sources of information include the Department of Ecology's Stormwater Management Manual for Western Washington , Washington State's Aquatic Habitat Guidelines (AHG) Washington State Department of Fish and Wildlife's "Management Recommendations for Washington's Priority Habitats: Riparian, and Spence et al (1996).	A complete list of sources reviewed for this study is listed in Section 7 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report. Although the final version was not officially released until about the time that the I-405 Corridor Program DEIS was published, the draft version of Washington State Department of Ecology's (Ecology's) Stormwater Management Manual for Western Washington or functionally equivalent guidance was extensively reviewed and incorporated into the surface water analysis.
L54	WR	2	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS refers to manuals and guidelines of local jurisdictions, including King County's Surface Water Design Manual and Snohomish County's Title 24, but does not state how this information is used to assess effects, consider avoidance, or influence selecting an alternative. Given that WDOT's responsibility under the National Pollution Discharge Elimination System permit is to protect the beneficial uses of surface waters regardless of local regulations, the local jurisdiction manual and/or guidelines are not necessarily important to considering practices or effects. While most local jurisdictions have their own manual, usually based on King County's Manual or have adopted the 1992 Ecology manual, those jurisdictions have different thresholds for applying the requirements that may lead to inadequate protection of surface water resources (Reiser et al 2000, Booth and Jackson 1997). King County modified its manual in 1998, and many jurisdictions still apply the older standards. Considering the application and adequacy of standards, rather than the existence of standards, would provide information to address whether adverse effects will be prevented. The FEIS should provide a commitment to using the highest possible standards and assuring that WDOT commits to attaining beneficial uses of waters.	This assertion is incorrect. In a number of cases, the stormwater regulations of local jurisdictions are the result of local basin plans and contain stricter requirements than the basic requirements of the state manual. An example is King County's requirement for stormwater phosphorus reduction at certain lakes, such as Sammamish and Desire. Section 3.5.2.1 of the Final EIS states that the projects will meet the requirements of Washington State Department of Ecology's (Ecology's) Stormwater Management Manual for Western Washington or functionally equivalent guidance. These requirements are considered the currently accepted practices of the region. Using the Ecology standards for assessment of the Alternatives would lead to the best protection possible. All jurisdictions have two years to revise their stormwater provisions to be equivalent to those of the state. Locally sponsored projects will therefore also meet state stormwater management requirements.

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L54	WR	3	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS should identify the relevant information and components of the Tri-County Endangered Species Act (ESA) Response Effort. That effort has been ongoing since 1998, and has produced proposals on many topics. In 2000, Tri-County submitted a "package" to NMFS and USFWS that included a biological assessment (BA) of the stormwater management proposal using the analytic framework from the Matrix of Pathways and Indicators developed by NMFS (1996) and USFWS (1998). That BA found that most elements of the stormwater proposal would, at best, maintain, but in most cases - especially land use - allow continued degradation of the environmental baseline, which is already degraded. The Tri-County Stormwater Management "plank" has received extensive review, from R2 Resources, which provided a "bioassessment" in July 1999 and from the Tri-County Biological Review Committee in August 1999. These assessments provide critical reviews of the program, and discuss the necessity of a comprehensive, integrated program to reverse declining trends of regional water quality and salmonid populations. The I-405 EIS should incorporate applicable land use and stormwater management recommendations from these reviews.	Jackie Kern was contacted on December 5, 2001, to review the status of the Tri-County Effort. She is the Manager of the King County Executive Endangered Species Act (ESA) Policy Coordination Office. She stated that the 14 elements (planks) of the stormwater program together form a model program. The Road Maintenance Standards, the only plank specifically approved to date, will be published soon in the Federal Register for inclusion under the 4d Rule. The federal agencies are currently conducting a biological review of the entire program. Once approved by the National Marine Fisheries Service (NMFS) and the United States Fish and Wildlife Service (USFS), the model program could be adopted by ordinance by local agencies, providing ESA coverage to the activities of these agencies. The memorandum from the Tri-County Biological Review Committee (August 1999) was reviewed. That memorandum presents several good suggestions for a more effective program, but many of them are not applicable to the programmatic impact assessment for the I-405 Corridor Program. However, at least one of the recommendations, the fact that the Washington State Department of Ecology's (Ecology's) 1992 Stormwater Management Manual for Western Washington was unlikely to provide effective protection, has been incorporated into the I-405 Corridor Program DEIS. The I-405 Corridor Program will follow stormwater measures equivalent to the latest version of Washington State Department of Ecology's (Ecology's) Stormwater Management Manual for Western Washington, thereby providing considerably better stream protection. A somewhat later version of the document reviewed in the 1999 memorandum was reviewed during the preparation of

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					the I-405 Corridor Program DEIS and appears on page 4-6 (Reference Chapter) of the Tri-County Urban Issues ESA Study-Guidance Document (R2 Resource Consultants, February 2000). Section 3.3 of that document presents a set of stormwater and natural resources management recovery tools aimed at reversing the declining trend in salmon populations in the region. The thrust of this section is an effective, unified, and multijurisdictional approach to stream and water quality management. This section contains 14 management tools for salmon recovery, devoting a subsection to each one. These are briefly reviewed as part of the Tri-County regional stormwater management strategy, which is discussed on page 41 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report. Many of the concepts appear in both the I-405 Corridor Program Draft Surface Water Resources Expertise Report and the I-405 Corridor Program Draft Fish and Aquatic Habitat Expertise Report. A number of the applicable mitigation measures from the Tri-County Urban Issues ESA Study-Guidance Document (R2 Resources Consultants, February 2000) appear as water resource mitigations in Section 3.5.5.1 of the I-405 Corridor Program DEIS. These include stormwater management measures equivalent to the Stormwater Management Manual for Western Washington; regional stormwater facilities, where practical; and basin-level mitigation of residual water resource impacts. Additional information on the Tri-County Response Effort can be found in Section 3.3.2 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report. The King County Executive Endangered Species Act (ESA) Policy Coordinator was contacted to obtain current information on the status of the Tri-County Response

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				The DEIS should explain the relationship with the Tri-County ESA Response, including whether a successful agreement among NMFS and the local governments to protect and restore conditions for ESA-listed species is necessary to reduce the cumulative effects the DEIS considers. A July 2000 message from Steve Landino to Mike Cummings of WDOT shows the importance of such an agreement to NMFS 'ability to approve any action in the I-405 Corridor. The Tri-County Effort has yet to achieve agreement with NMFS or USFWS regarding conservation programs for ESA-listed species, and the effort failed to meet its milestone to develop a tailored limitation by April 2000 (65 FR 171, January 3, 2000). The EIS should indicate how success or delay at Tri-County influences the likely the continuation of the factors that have degraded conditions for ESA-listed species.	Effort (personal communication with Jackie Kirn, King County Executive Office, Seattle, December 5, 2001). The stormwater plank related to Standards for Road Maintenance is expected to be published soon in the Federal Register. A Biological Review is currently being carried out on the entire Tri-County Program for its ability to adequately protect the listed chinook salmon and bull trout. If the program is found to be compliant, then the individual local agencies that adopt and/or demonstrate complying enforcement measures can apply to National Marine Fisheries Service (NMFS) for inclusion under the 4d Rule. In addition, the proposed stormwater measures are being coordinated with the Washington State Department of Ecology (Ecology) to assure that they also satisfy National Pollutant Discharge Elimination System (NPDES) requirements.
L54	WR	4	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS (Section 3.5.2.1) considers potentially serious operational impacts to occur within basins experiencing a substantial increase in impervious surface (one percent or greater per project of total basin area). This ignores the current conditions, which is part of cumulative effects per NEPA (40 CFR 1508.7) and environmental baseline per ESA (50 CFR 402.02). Incorporating baseline conditions into the consideration of effects guides avoidance measures, alternative selection, and restoration efforts (Muckleshoot Indian Tribe 2000). Furthermore, the DEIS should look at total impervious surface by alternative, rather than by project, which distorts the cumulative effects of multiple projects in a single basin.	Baseline conditions within individual stream basins, such as the Clean Water Act Section 303d List, have been taken into consideration in the environmental analysis (refer to Section 4 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report). In addition, the analysis has also reviewed total impervious area generated, both at the basin level and the alternative level.
L54	WR	5	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS (Section 3.5.2.1) only considers effects to streams already known to violate water quality standards. This fails to consider alternatives and mitigation approaches to prevent streams from violating water quality standards.	Runoff best management practices (BMPs) will be applied to all projects to avoid water quality degradation. Specific water quality protection measures will be identified during the environmental documentation for the individual projects.
L54	WR	6	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS should consider additional sources of information about stream quality, in addition to the 303d list. For example, King County collects water quality data, as do the Muckleshoot Indian Tribe and various departments and programs at the University of Washington. Many of these data sets show that streams in the study areas violate water quality standards or fail to maintain healthy aquatic biota, although this is not reflected in the 303d list.	Other sources of water quality information were reviewed, including basin reports. More information can be found in Section 4.3 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report. Although not exhaustive, the level of water resource information presented in the I-405 Corridor Program DEIS and supporting documents is adequate for the programmatic EIS. More detailed data will be reviewed during the environmental documentation for the individual projects.

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L54	WR	7	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS should also consider the adequacy of current state water quality standards to protect salmon. The state is in the process of revising water quality standards to make them more protective of salmonids, shellfish, and human health than current standards. (Hicks 2000a, Hicks 2000b, Hicks 2000c) The new approach would still place more risk on salmonids than the do the Matrix of Pathways and Indicators provided by NMFS and USFWS (NMFS 1999b, NMFS 1996, USFWS 1998). State water quality standards do not include all factors relevant to salmon or healthy aquatic systems. The FEIS should consider the broad perspective offered by biological evaluations, which stands a better chance than narrow chemical criteria or conventional measures of urban development to sustain living rivers. (Karr and Chu 2000) Rather than relying on thresholds of effect (such as the 303d list), the FEIS should consider early-warning indicators and leading-edge variables to prevent ecological harm from occurring and guide restoration measures (Bauer and Ralph 1999). An approach that relies on compliance with permit requirements does not assure compliance with standards, because construction and industrial NPDES permits have no such requirement (WDOE 1993a, 1993b). WDOT has intervened to protect the status quo regarding the NPDES construction permit's lack of a requirement to comply with water quality standards (PCHB No. 00-173). The municipal NPDES permit, which governs WDOT activities within jurisdictions that are Phase I municipal permit holders, presumes, but does not demonstrate, that compliance with BMPs is adequate (WDOE 1995a, WDOE 2001b).	Proposed changes to the state Water Quality Standards are discussed in Section 4.3 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report. The regional analysis performed for this programmatic EIS requires using criteria that are readily available across the region and also reasonably straightforward to interpret and present. This guided the choice of the criteria used in the analysis. Using treatment-based best management practices (BMPs) versus water quality-based BMPs is a policy question that is beyond the scope of this EIS.
L54	WR	8	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS does not provide any source or justification for the statement that the I-405 Corridor Study area contains abundant water resources (p 3.5-5). Merriam-Webster's Collegiate Dictionary defines abundant as: marked by great plenty (as of resources) <a fair and abundant land> b: amply supplied. Both rivers, the Cedar and Green and their associated tributaries, are over-appropriated, closed to further withdrawals, and do not support benefical uses of water (King County 2001a, 2001b, WDOE 1995b, 1980, 1979). The EIS should properly characterize water resources, and identify and implement means to fully support beneficial uses and conserve ESA-listed species.	The context in which the phrase "abundant water resources" is used refers to the numerous streams and lakes within the boundaries of the study area.

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L54	WR	9	Steward and Associates Agency: Sensible Solutions Coalition	DEIS does not provide a record of discharges, i.e. peak, minimum, and average discharges precluding an informed evaluation of the effects of changes to these conditions, and how those changes affect attainment of beneficial uses per the Clean Water Act and conservation of ESA-listed species per the ESA. The FEIS should provide this hydrologic information by basin, a discussion of how I-405 alternatives affect these conditions, and how those changes affect the water resources and aquatic and terrestrial species that rely on water.	Table 4.1 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report summarizes flow information for the streams within the study area. Impacts to aquatic and terrestrial species are described in the DEIS in Sections 3.7 and 3.8 at a scale appropriate to this programmatic EIS.
L54	WR	10	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS does not present results consistent with the stated scientific basis. For example, on page 3.5-9, the DEIS notes that: overall total impervious area coverage within the 134,000-acre study area is 36 percent. Individual basins range from 17 percent impervious area for the Soos Creek Basin to 55 percent impervious area for the Duwamish River Basin. Research on urban streams by the University of Washington Center for Urban Water Resources suggests that substantial declines in stream invertebrate populations and other measures of stream health occur when development within a basin reaches about 10 percent impervious area (May et al., 1997). May's research considered fourth order streams, and may not be applicable to consider the entire study area or larger waterways such as the Duwamish River.	May's work is applicable to the majority of the streams within the study area. His work covered several of the streams within the study area, including Bear Creek and Soos Creek.
L54	WR	11	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS also considers a limited range of effects. May's work considered numerous indicators in addition to impervious surface, including width of the riparian corridor, drainage density that is within 25% of pre-development conditions, off-channel riparian wetlands, and waterways free of fish passage barriers. The "other measures of stream health" from May's work are at least as important as effects to stream invertebrate populations. These effects include reduced coho and cutthroat trout populations and diminished physical habitat conditions necessary to support natural biological diversity and complexity. May's work, and subsequent research, indicates that there is no threshold for adverse effects (Booth 2000). The FEIS should establish and define significant and adverse effects, and the basis for making such a determination within the Study Area.	This programmatic EIS covers several dozen major streams across a 134,000-acre study area. The use of a few readily obtainable criteria for detailed analysis is sufficient for distinguishing impacts among the alternatives. Those criteria are presented in Section 3.5.2.1.

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L54	WR	12	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS misstates the state goal for treating and detaining runoff from highways (p 3.5-23). WAC 173-270-060(5)(a) states: WSDOT shall complete all practicable BMP projects or transmit highway runoff to tribes or local governments for stormwater treatment for highways with Average Daily Traffic of fifty thousand and greater by December 31, 2005, and for other highways by December 31, 2015. This goal is more than 10 years old, yet WDOT makes no reference to the required progress report or the actual progress. According to the annual reports that WDOT provides to WDOE as a compliance measure with the NPDES permit, WDOT is making very little progress toward the goal (WDOT 2000, 1999a). The EIS should provide a timetable and commitment so water quality and aquatic resources no longer bear the adverse effects of stormwater runoff and general ecosystem degradation.	The Highway Retrofit Program is discussed in more detail in Section 3.3.1 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report. Washington State Department of Transportation's (WSDOT's) timetable or commitments to this statewide program are beyond the scope of this EIS.
L54	WR	13	Steward and Associates Agency: Sensible Solutions Coalition	The references for section 3.5 list Booth 2000 and R2 Resources 2000, but these documents are not cited in the text. One of the conclusions from Booth is that no amount of impervious surface has negligible biological or hydrological effects; the decision of how much is acceptable is as much a social decision as a hydrologic one. The EIS should provide the assumptions, values, and criteria used to assess and make this decision. R2 Resources finds that urbanization has resulted in extensive losses of estuarine, wetland, and riparian habitats in areas that were important habitat areas for salmon. R2 also notes the limited effectiveness of BMPs to prevent further biological declines, and recommends protection of the best remaining habitats, rehabilitation of critical functions, and implementation of modified management and regulatory practices to protect and restore water quality and fish habtiat.	The methodology, assumptions, and impact criteria are presented in Section 3.5.2.1. Protection of high-quality habitat and rehabilitation of critical stream functions are some of the measures considered in the Early Action Mitigation Program developed for the I-405 Corridor Program.
L54	WR	15	Steward and Associates Agency: Sensible Solutions Coalition	The FEIS should identify how impact avoidance was incorporated into the decision about a preferred alternative, and identify, by basin, those stream reaches and basin areas that will receive protection or rehabilitation.	The Early Action Mitigation Program being developed for the I-405 Corridor Program has identified some of the stream reaches that will receive protection and/or restoration measures. Additional mitigation will be identified during environmental documentation for the individual projects.

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L54	WET	1	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS does not provide enough information about data sources and methods to assess whether the data is complete and accurate. The National Wetlands Inventory (NWI) is more than 7 years old, and based on data older than that. Many of the data sources WDOT used to supplement the NWI are older than the NWI or based on different data collection and analysis methods. Consequently, the data sources may not be compared or combined in any meaningful way.	The wetland analysis used the best available data sources, all of which are identified in Section 3.6.1.1. As stated in Section 3.6.1.1, aerial photographs from 1999 were reviewed and local agencies contacted to supplement the data sources. On-site wetland evaluation, delineation, and surveys will be performed immediately prior to project design, but are not practical at this time because of the large number of wetlands in the analysis area and the time until project design (the wetland boundaries could change and/or the delineation may no longer be valid). Any determination of a wetland as irreplaceable would be subjective at this point. This determination will be made after on-site evaluation prior to project design.
L54	WET	2	Steward and Associates Agency: Sensible Solutions Coalition	The analysis considers potential wetland impacts when any portion of the road prism or other potential improvements overlapped the wetland boundary (Section 3.6.2). This is not a scientifically sound approach for two reasons. First, wetlands need a buffer to protect wetland functions, and impacts can occur anytime that buffer is reduced (WDOE 1992). Second, impervious surface in the drainage basin containing the wetland influences the wetland hydrograph, which influences wetland functions and species 'usage (Azous and Horner 2001). The consideration of wetland should extend to all impacts including those beyond the wetland boundary. The impact discussion acknowledges that '[w]hile impacted wetlands within the study area may not provide all of their historic functions, they remain a valuable and sometimes irreplaceable resource." (DEIS page 3.6-15). The EIS should specify when wetlands are an 'irreplaceable resource." The EIS and action alternative should avoid any degradation to resources or functions that are impossible to replace. The DEIS does not provide information on the species communities in wetlands. Numerous native and non-native plants grow in wetlands (Cooke 1997). Wetlands also support amphibians, birds, and other wildlife species (Azous and Horner 2001). The FEIS should provide a framework for assessing, avoiding, minimizing, and mitigating all effects to wetland functions in the Study Area. The distinction between High and Low Priority wetlands does not help inform a selection among alternatives, in part because the U.S. Army Corps of Engineers does not recognize the distinction. Furthermore, the EIS should consider ways to restore wetland conditions and functions to increase the amount and function of all wetlands.	The potential for wetland buffer impacts was considered and is addressed in the Construction Impacts headings of Section 3.6.4 of the Final EIS for each action alternative. Indirect impacts (impacts to hydrology, water quality, etc.) are addressed in the Operational Impacts heading of Section 3.6.4. Determination of which wetlands are "irreplaceable" is outside the scope of this programmatic EIS. Subsequent environmental review and wetland delineation will occur at the project level. WSDOT is committed to no net loss of wetland area and function. The sequential steps to be implemented in the mitigation process are identified in Section 3.6.5.1. Because of the varying wetland classifications between agencies, the EIS adopted the "High" and "Low" Priority rating of wetlands for comparing alternatives. Applying each of the agencies' wetland classification systems would have resulted in multiple classifications for a single wetland. Classifications of wetlands in different jurisdictions were not exactly comparable. Specific wetland mitigation design will be completed at the project design stage and will address specific wetland functions, including the presence of plant communities and wildlife species; however, general mitigation measures are provided.

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L54	WET	3	Steward and Associates Agency: Sensible Solutions Coalition	Local government ordinances vary substantially in the buffers they accord wetlands and mitigation requirements. As of 1998, none of the governments in the study area have adopted Ecology's model wetlands ordinance (WDOE 1993c, WCTED 1998). In light of this variation, WDOT should establish wetland protection and restoration goals, criteria, and policies that provide better outcomes for wetlands than do local ordinances.	WSDOT will comply with all applicable federal, state, and local regulations that pertain to wetlands. Regardless of the applicable requirements, WSDOT's mitigation approach is to have no net loss of wetland functions.
L54	WILD	1	Steward and Associates Agency: Sensible Solutions Coalition	Section 3.7 describes wildlife, habitat, and upland threatened and endangered species. This section addresses upland habitat and wildlife species, including threatened and endangered, priority, and monitor species, and species of concern. Fish species are discussed in Section 3.8, Fish and Aquatic Habitat. Wetlands are discussed in Section 3.6, Wetlands. By disjoining these aspects of the ecosystem, the DEIS fails to consider ecological interactions that are inherently joined (Cederholm et al 2000, Lichatowich 1999, NRC 1996). Section 3.8 describes existing fish population and habitat conditions within the study area and assesses potential impacts of the I-405 Corridor. This section is related to the Fish and Aquatic Habitat Expertise Report, although neither the DEIS nor the Expertise Report explain the relationship.	The aspects of the ecosystem that you mention are inherently joined. Each of these aspects of the ecosystem was addressed in individual sections because of the scale of the analysis and to follow typical EIS formatting. The analysis used a habitat-based approach for describing and quantifying impacts. This was necessary to facilitate a comparison between alternatives. Although this approach does not describe the interrelated effects between each aspect of the ecosystem, it adequately identifies quantifiable impacts to all habitats that would be affected by each alternative.
L54	FATE	2	Steward and Associates Agency: Sensible Solutions Coalition	Section 3.8.1.1 states that '[t]he baseline conditions were assessed by basin (King County, 1999) in order to more accurately identify the widely varying watershed conditions, habitat conditions, and fish populations throughout the study area" (emphasis added). The DEIS does not explain the desired level of accuracy or how King County achieved that desired level. Furthermore, the DEIS was published in August 2001, so the baseline conditions are likely to have changed since King County gathered the data. If the report was assembled in 1999, the report must have been based on data older than that. The DEIS does not provide any mechanism for including consideration of more recent data, analysis, or conditions. In light of rapid land conversion, considering the most recent data and establishing a mechanism to include new information as it is generated is essential to adequately consider environmental baseline conditions and changes to those conditions (Booth 2000)	The King County 1999 reference that you mention was meant to indicate that basin delineations were based on 1999 King County GIS data. Basin condition descriptions were based on numerous sources including basin plans and draft sections of the unpublished WRIA 8 Steering Committee Habitat Limiting Factors Report (published September 2001) and the WRIA 9 Steering Committee Habitat Limiting Factors Report (published July 1999). Additional, newer information and references may have become available since publication of the Draft EIS. During the project -level phase, as individual projects are designed and permitted, impact assessment and mitigation will use the best available science at that time.

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L54	FATE	3	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS (p. 3.8-1) provides no criteria, data collection methods, or other proof to support the assertion that "[e]xisting fish species distribution and habitat conditions were described using the most recent and comprehensive available sources." The DEIS states that sources are cited in the I-405 Corridor Program Draft Fish and Aquatic Habitat Expertise Report, but this report omits numerous reviews or fish species distribution and habitat conditions in the study area including research from the University of Washington , Protecting and Restoring the Habitats of Anadromous Salmonids in the Lake Washington Watershed, an Urbanizing Ecosystem (Fresh and Lucchetti 2000), Return of the Kings (King County 1999), The Status of Chinook Salmon and Their Habitat in Puget Sound (Cramer et al 1999), Lower Cedar River Basin and Nonpoint Pollution Action Plan (King County 1998), Effects of Urbanization on Puget Sound Lowlands Streams (May et al 1997), Regional Needs Assessment (1997) and studies and assessments by the Muckleshoot Tribe. In order to consider the completeness and accuracy of the EIS as well as the data and analysis upon which the EIS relies, the FEIS should disclose all sources of information and how those sources are used. The DEIS notes that baseline conditions as defined for this program do not equate to existing conditions because the No Action Alternative projects will be implemented with or without the I-405 Corridor; therefore baseline conditions include their impacts. The DEIS does not, however, state how the King County data was adjusted to reflect the changes attributed to the No Action projects. Consequently, a reader cannot determine the accuracy of the changes or the effects on the environment.	The description and analysis was based entirely on literature review because the program study area was far too large and dispersed to perform original site-specific data gathering. A review of Section 7 of the Draft Fish and Aquatic Habitat Expertise Report shows numerous sources of data and information including the C. May document, WDFW data, several King County basin plans, conditions reports, reconnaissance reports, NMFS status designations, and the Muckleshoot Tribe's draft Lake Washington Chinook Salmon Recovery Plan. Certainly, the writers were not able to find every potential information source among the rapidly growing body of both published and unpublished relevant literature. Baseline conditions were established as the No Action Alternative conditions when tallying the two quantitative measures: impervious surface and riparian encroachments. Engineers estimated the new impervious surface that would be created by each project. GIS analysts calculated the number of riparian encroachments that would be created by each project. These data were tallied by alternative and by basin in order to be added to the existing Table 4.1 in the Draft Fish and Aquatic Habitat Expertise Report. More general narrative descriptions of the baseline conditions were based on numerous sources reflecting existing conditions, and were not specifically adjusted. The level of impact from the projects included in the No Action Alternative would not be sufficient to change the general characteristics of the basin such as species presence.
L54	FATE	4	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS, page 3.8-1, states that "[s]pecific rules implementing Section 4d of the Endangered Species Act (ESA) would take the form of state and local regulations, and would constrain design and construction of individual projects included in the I-405 Corridor." This misrepresents two aspects of local government regulations and the ESA. First, local government regulations may comply with, but they do not implement the ESA. Nothing in the ESA allows the federal agencies to delegate implementation to local governments. Second, regarding chinook salmon, only NMFS can establish a rule per Section 4(d) of the ESA.	Terminology was clarified in Section 3.8.1.2 to avoid misunderstanding.

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L54	FATE	5	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS does not adequately provide the context and significance of the ESA listing. The ESA declares the policy of Congress that all Federal departments and agencies shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of the purposes of this chapter (16 U.S.C. 1531(c)). The ESA also allows for third-party lawsuits, civil, and criminal penalties as enforcement mechanisms (16 U.S.C. 1540).	A corridor-level EIS leading to a programmatic decision on the best mix of modal solutions, transportation investments, and demand management to improve movement of people and goods throughout the corridor, reduce foreseeable congestion, and satisfy the overall purpose and need is not a federal action requiring ESA consultation. However, FHWA and WSDOT will work with NMFS and USFWS to identify actions that could result in the take of listed species. To address concerns with the workload involved in conducting a large number of individual consultations on I-405 corridor projects (November 26, 2001, letter from Steve Landino), FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for consultation on a programmatic level.
L54	FATE	6	Steward and Associates Agency: Sensible Solutions Coalition	The I-405 Corridor inappropriately defers an ESA Section 7 consultation. The DEIS states that ESA would be addressed as necessary during permitting for each project that is ultimately proposed for construction, which will require analysis in all cases, and consultation with the federal services depending on whether a federal nexus is involved. The ESA §7 consultation process is the official means established by law to evaluate the impacts of federal actions on imperiled species. However, the DEIS creates the appearance that FHA, WDOT, and the other co-leads intend to pursue ESA consultation on a project-by-project basis rather than on the program as a whole. A letter from Michael Cummings, Washington Department of Transportation to Robert Turner, NMFS dated January 8, 2001 confirms the fact that WDOT has no intention of requesting the Federal Highways Administration (FHA) to seek formal section consultation on the decision to select a preferred alternative for the I-405 Corridor. Such a strategy very likely leaves FHA subject to citizen suits that could seriously delay implementation of the program. See Pacific Rivers Council v. Thomas, 30 F.3d 1050 (9th Cir. 1994) (court concluded that forest service must seek ESA consultation on overall forest management plan as well as individual projects; all forest work enjoined pending completion of consultation).	The Final EIS text has been changed to reflect the following: FHWA and WSDOT will work with NMFS and USFWS to identify actions that could result in the take of listed species. FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for ESA Section 7 consultation on a programmatic level." WSDOT has also prepared a Draft Proposed Early-Action Environmental Impact Mitigation Decision-Making Process. This document coordinates specific programmatic basin-level mitigation with WRIA 8's forthcoming "Near Term Action Agenda" for basin-level mitigation. The Final EIS and programmatic consultation adequately address all ESA listed species found in the project area in a manner consistent with a programmatic analysis.

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L54	FATE	7	Steward and Associates Agency: Sensible Solutions Coalition	Full consideration of the I-405 Corridor's impacts to ESA-listed species should precede a decision on a preferred alternative. Once an alternative is selected from the options presented in the DEIS, the overall direction of the project will have been determined. The public will have lost the opportunity to make decisions about how to minimize overall program impacts to ESA-listed species. Consultation on the impacts of an individual stream crossing or bridge improvement might not be terribly meaningful if the public never had the opportunity to look at the impacts of the program as a whole, and assist FHA in selecting an alternative that complies with the strict mandates of the ESA. By explicitly deferring ESA-review to specific projects, the DEIS makes clear that it is inadequate to assess the project's affect on ESA-listed species.	The EIS analysis was designed to allow comparison of relative potential impacts among alternatives based on quantifiable program-level indicators: riparian encroachments and new impervious surface. Through these indicators, the EIS and Expertise Report provide adequate information to compare potential overall impacts among the alternatives at the extremely broad, general scale of the program. FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for consultation on a programmatic level. It is only at the project level that construction measures, alignment, and mitigation can be specifically designed to protect ESA listed species and impacts can be assessed in detail.
L54	FATE	8	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS inappropriately and inadequately considers effects to ESA-listed species. CEQ's regulations implementing NEPA require that "[t]o the fullest extent possible, agencies shall prepare draft environmental impact statements concurrently with and integrated with environmental impact analyses and related surveys and studies required by the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq.), the National Historic Preservation Act of 1966 (16 U.S.C. 470 et seq.), the Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.), and other environmental review laws and executive orders" (40 CFR 1502.25). During the I-405 Corridor planning process NMFS has provided written notice of inadequacies regarding the Expertise Reports and the consideration of effects to ESA-listed Puget Sound chinook salmon (NMFS 2000a, 2000b-i). The October 2000 letter from NMFS contained substantive comments requesting that WDOT consider how the I-405 alternatives would	The NMFS and WDFW comments on the Draft EIS and technical expertise reports were responded to as fully as practical and resulted in expanded analysis and discussion in the document. Also see L41.FATE-4.

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				affect proper function of various elements of fish habitat including water quality, channel condition and dynamics, habitat access, flow/hydrology, habitat elements, and watershed conditions per properly functioning conditions and suitable critical habitat. The Washington State Department of Fish and Wildlife (WDFW) conveyed concerns about the adequacy of the Expertise Reports to consider effects to water quality and fish (WDFW 2000). WDFW emphasized the need to develop an alternative with zero or minimal impact to fish and wildlife resources. WDOT has not incorporated any of these considerations into the DEIS or Expertise Reports. The FEIS should reflect these considerations.	
L54	FATE	9	Steward and Associates Agency: Sensible Solutions Coalition	The contention that "ESA issues would be addressed as necessary during permitting for each project that is ultimately proposed for construction" (page 3.8-1) invites consideration of how WDOT reviews individual projects. Three biological assessments (BA; SR-405/SR-167 Interchange Modification, SR-18: 180th to Maple Valley Widening, and I-90 Sunset Interchange) of projects in the I-405 study area and 36 concurrence letters from NMFS regarding WDOT BAs provide a strong indication that project-permitting is not contributing to the conservation of ESA-listed species. For example, the I-90 Sunset Interchange project will degrade habitat for chinook salmon and adversely affect the species. The SR-405/SR-167 Interchange BA asserts the project will maintain improperly functioning conditions, but omits the ongoing effects of a roadway within 50 feet of a creek that is suitable for, but not presently used by, chinook. The SR-18 project will replace some culverts with bridges, but ignores several important indicators that are directly affected by roads: water temperature, road density and location, and drainage network. The concurrence letters from NMFS show that WDOT does not generally improve riparian conditions or increase watershed forest cover.	NMFS and USFWS screen projects as they choose to concur or not concur with determinations of effects proposed in the biological assessments for individual projects. If the agencies issue concurrence with the determination, then by definition the determination is considered adequate. The co-lead agencies are initiating consultation with preparation of a programmatic biological assessment.

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L54	FATE	10	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS understates the significance of the 1996 Sustainable Fisheries Act (SFA; 16 U.S.C. 1801 et seq.) The SFA established procedures intended to identify, conserve, and enhance Essential Fish Habitat (EFH) for those species regulated under a Federal fisheries management plan. In the study area, these species include chinook, coho, sockeye, and pink salmon as well as marine species (PFMC 1999). The SFA also requires federal agencies to consult with NMFS regarding projects that may adversely affect EFH (50 CFR 600). In light of the adverse effects to water resources and fish the DEIS identifies, FHA should pursue SFA consultation for the I-405 Corridor and identify opportunities to protect and conserve EFH. The discussion of federal regulations omits EPA's responsibility under the Safe Drinking Water Act, CERCLA, and RCRA; the Dept. of Commerce's Office of Coastal Zone Management (CZM) responsibility and Sustainable Fisheries Act EFH consultation. Each of these regulations is relevant to fish and aquatic habitat, and the expertise report should consider the procedural and substantive requirements of the regulations. The discussion of state regulations omits DOE's authority under section 401 of the Clean Water Act (33 U.S.C. 1531 et seq.) to condition CWA Section 404 permits from the U.S. Army Corps of Engineers, CWA section 303 responsibility to set water quality standards and ensure that waterbodies comply with standards, and CWA section 402, the issuance of Nonpoint Discharge Elimination System (NPDES) permits to prevent degradation of surface water quality. Each of these regulations is relevant to fish and aquatic habitat, and the expertise report should consider the procedural and substantive requirements of the regulations.	Discussion of the specific SFA procedures has been expanded in Section 3.8.1.2 of the Final EIS. The fish and aquatic mitigation section of the EIS represents opportunities to conserve and protect EFH. The specific project-level impact of hundreds of projects that have not been designed yet cannot be accurately estimated at this time for the level of detail typically required in ESA consultation. FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for consultation on a programmatic level. Specific water quality regulations are discussed in Section 3.5: Water Resources and the Draft Water Resources Expertise Report.
L54	FATE	11	Steward and Associates Agency: Sensible Solutions Coalition	The state's use of these authorities to recovery salmon populations is discussed in Extinction is Not An Option: The Statewide Strategy to Recover Salmon (SSRS; Washington Governor's Office 1999) and critiqued by the Independent Science Panel (ISP 2000). The DEIS should consider the adequacy of these authorities, or lack thereof, to achieve intended purposes.	Please refer to response to comment L54.FATE-45.
L54	FATE	12	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS, page 3.8-2, asserts that "[s]ome local regulations, such as Snohomish County Habitat Management Plan Administrative Rule for Puget Sound chinook salmon, will serve to implement the ESA by establishing rules as per Section 4d of the ESA." This misrepresents several aspects of local government regulations and the ESA and	The Final EIS has been changed to state that some local regulations will serve to "comply with ESA 4(d) rules and potentially obtain a limitation on the prohibition against take." Section 3.2.2 of the Draft Fish and Aquatic Habitat Expertise report mentions Snohomish County's chinook salmon rule as an example

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				implications for fish and aquatic habitat in the study area. First, local government regulations may comply with, but they do not, implement the ESA. Nothing in the ESA allows the federal agencies to delegate implementation to local governments. Second, regarding chinook salmon, only NMFS can establish a rule per Section 4(d) of the ESA. Third, the Expertise Report should consider the likelihood that any local governments in the I-405 Corridor study area will receive a limitation from the prohibition against take. Snohomish County, King County, Bellevue, and others (the "Tri-County ESA Response") have been meeting with NMFS and USFWS since 1998 in an effort to negotiate a limit on the prohibition against take pursuant to Limit 12 NMFS proposed in the ESA Section 4(d) rule (NMFS 2000l) for Municipal, Residential, Commercial, and Industrial Development and Redevelopment (MRCI). This effort has yet to meet stated milestones, including the milestone to develop a tailored limitation by April 2000 (65 FR 171, January 3, 2000). Fourth, the Expertise Report lists only one government, even though at least 7 cities and 2 counties and many special purpose districts are in the Study Area. The DEIS fails to discuss how different jurisdictions have different regulatory requirements, and how this may affect the environment including fish and aquatic habitat. Ordinances regulating development within critical areas vary widely among jurisdiction in the Study Area, and none of them have adopted Ecology's model Wetland ordinance or fully implemented WDFW's Priority Habitat and Species (PHS) Program (WCTED 1998, WDFW 2001, WDOE 1993). Local government requirements and enforcement varies considerably, and would benefit from periodic review and revision of regulations, adequate staffing levels to provide technical expertise and enforcement, construction monitoring, regional training and education, and an educational approach to enforcement (Reiser et al 2000). Furthermore, WDOT performs Biological Evaluations or Assessments only for federally funded or approved projects (Fish	rather than a complete listing of requirements. This section also states that the different jurisdictions all have their own ordinances that will regulate the projects. A complete summary of local jurisdictions' regulations and site-specific ESA coordination efforts will occur at the project level. However, FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for consultation on a programmatic level. In-depth consultation may be required at the project level.

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				and Aquatic Habitat Expertise Report Section 3.2.1, WDOT 1999b), yet WDOT has the same responsibility not to "take" ESA-listed fish regardless of federal funding (65 FR 42422, Attorney General of Washington 2000). WDOT complies with NPDES permit conditions in the 2 cities and three counties that have NPDES permits, and builds roads to lower detention and treatment standards in jurisdictions that do not have NPDES permits (WDOT 2001, WDOT 1997, WDOT 1995).	
L54	FATE	13	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS minimizes the significance of the "co-manager" status that the Muckleshoot Indian Tribe has in the I-405 Corridor Study Area. Referring simply to the "Boldt Decision of 1974" ignores numerous other decisions, especially Judge Orrick's decision in phase II of U.S. v. Washington, and treaty rights that predate the Boldt decision (Cohen 1986). Those rights include having fishable runs and the ability to earn a modest living fishing. The Muckleshoot Tribe has significant expertise regarding habitat conditions and how those conditions affect salmon. Although the DEIS lists in the References (Section 4) the Technical Review Draft of the Lake Washington Chinook Salmon Recovery Plan, which the Muckleshoot and other Tribes developed, the DEIS does not make any other mention of the Plan, its data, or its findings, especially the one that harvestable populations of chinook salmon are possible. The DEIS does not provide any discussion about how Tribal Treaty rights may influence consideration of impacts, alternatives, or mitigation.	The discussion of Indian Tribal fishing rights has been expanded in Section 3.8.1.4 of the Final EIS as per comment L.34.FATE-3 from the Muckleshoot Tribe.
L54	FATE	14	Steward and Associates Agency: Sensible Solutions Coalition	Section 3.8.4 of the DEIS does not provide any scientific basis for the claims regarding impacts to fish. Failure to provide this basis is contrary to NEPA's direction that federal agencies shall "utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decisionmaking which may have an impact on man's environment" (42 U.S.C. 4332(a)) and CEQ's regulations implementing NEPA, especially 40 CFR 1502.24, which states ? ? A A ? ? ? ? A ? A methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement." Identifying the scientific basis is essential to identify cause and effect relationships, and guide efforts to conserve the species (Groot, Margolis, and Clarke 1995)	Section 3.8.4. is based on published scientific observations about the effects of increased impervious surface and riparian disturbance on fish habitat. The introductory section briefly reviews these; they are described and referenced in more detail in the Draft Fish and Aquatic Habitat Expertise Report. To present detailed analysis of each impact mechanism for every project relative to its specific site within the study area would be an excessive amount of detail for the purpose of comparing the EIS alternatives. Therefore, Sections 3.8.4.1 to 3.8.4.5 make quantitative comparisons among alternatives based on these two indicators of potential impact.

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L54	FATE	15	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS does not establish the mechanism or degree by which the 3 factors - number of stream crossings, number of encroachments within 300 feet of streams, and total impervious area - identified in Section 3.8.2 affect the environmental conditions listed in Section 3.8.4. These indicators do not adequately measure the full range of impacts that the project may have on the environment. They measure the consequences of road and facility construction, and then only in physical terms. For example, the effects of increased traffic volumes and other activities that would derive from the project are ignored. The indicators are too narrowly focused: other measures of physical impact, in particular, changes in water and sediment regimes, should be identified and used to screen alternatives. We recommend the use of indicators of properly functioning condition, as required in Section 7 consultations and other ESA permitting activities. I-405 project alternatives should be evaluated to determine the extent to which they affect conditions on the landscape that contribute to ecological and biotic changes (Naiman and Turner 2000). The use of these conditions will not only ensure that the full spectrum of physical conditions are evaluated, but, if combined with consideration of biological conditions, should enable specification of thresholds or a range of conditions that must be met if a biological community or population is to remain viable. The Technical Recovery Team (Ruckleshaus et al 2001) for Puget Sound has identified four key demographic attributes, (1) abundance, (2) productivity, (3) diversity, and (4) spatial structure, that should be monitored to determine the health of listed salmon populations. Because of their relevance in salmon recovery planning and feasibility analysis, we suggest that the I-405 Corridor project impacts to all salmonids, not just chinook, be evaluated in light of these population attributes.	There are only two indicator criteria: new impervious surface and riparian encroachments. Riparian encroachments include stream crossings and any other disturbance within 300 feet of the streams. Riparian encroachments were used because they represent potential direct and indirect fish habitat impacts. These measures were also chosen because they lend themselves to a "quantitative" estimation on a large, programmatic scale for projects that are only in the preliminary, conceptual stage of design. Not all encroachments are considered equal, e.g., some may be wider than others. Therefore, the estimation, although quantitative, provides a more qualitative comparison of effects. The ways in which both indicators affect fish habitat are more fully described in Section 3.8.4 of the Final EIS. Specifically, assessing other parameters such as channel erosion, sedimentation of spawning and benthic habitat, stream flow fluctuation, and increased pollutant loadings is difficult at the programmatic scale. The stream crossing and encroachment criteria are representative of these parameters.
L54	FATE	16	Steward and Associates Agency: Sensible Solutions Coalition	The impact and mitigation discussions do not tie impact or mitigation to effects. Identifying the causes of ecological degradation must precede and inform selection and implementation of protection and restoration efforts (FISRWG 2001). A restoration strategy, based on past land management activities that have contributed to a loss of historic aquatic habitat, can pursue restoration goals that target those causes (Doyle et al 2000). Absent such a connection between cause of degradation and effect, restoration and/or mitigation efforts will not likely reverse declining trends of fish habitat and populations (Spence et al 1996, Reeves et al 1991).	See response to comment L38.FATE-1.

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L54	FL	1	Steward and Associates Agency: Sensible Solutions Coalition	The use of maps of the 100-year floodplains from the Federal Emergency Management Agency (FEMA) is inadequate. As the DEIS notes, these floods have occurred more often than once per hundred years, so the probability is incorrect. More important, these maps do not provide information about how the project may affect flooding, and how those subsequent changes may affect the environment. Flooding is a natural phenomenon, and fish and other aquatic species have evolved with a flood regime (Bayley 1995). The EIS should use FEMA's 500-year floodplains to fully consider floodplain impacts. The FEIS should also consider historic floodplains. As the DEIS notes, human activities have simplified many rivers and disrupted the flood pulse. In order to consider whether the alternatives may preclude reestablishment of historic ecosystem conditions, an explicit consideration of those historic conditions is essential (Benda et al 1998). The focus on linear feet of impact to floodways ignores affects to volumes, flood pulse, and other elements of hydrology, which are influenced by more factors than lineal feet of intrusion into a floodway (Ziemer and Lisle 1998, Sparks 1995). For example, dams have adverse downstream ecological effects including those caused by disruption of natural flood flows (Ligon et al 1995). Furthermore, dikes, levees, and other alterations to the floodplain influence how water moves through a river system, and thus influences the fish and biota in that system (NRC 1996).	We appreciate the commentor's point of view and realize that floods beyond the 100-year have occurred in the last several years. The 100-year flood, however, has been the accepted standard in the industry for protection from flooding. Jurisdictions in the study area, especially King County, have been viewed as leading authorities in the area of flood and habitat protection. During the design phase, hydrologic models accepted by the jurisdictions will be used to assess the hydrology of the study area. FEMA maps were used because they can be used for consistency in evaluating the alternatives. The purpose in using these maps was to determine general impacts on a programmatic level and to best choose a Preferred Alternative. During the design phase, the 100-year floodplain will be delineated and any intrusion in the floodway or floodfringe would comply with FEMA and other local regulatory requirements. These requirements are geared to protecting habitat as well as flooding. They include preparing engineering plans and surveys.
L54	FL	2	Steward and Associates Agency: Sensible Solutions Coalition	In King County, flood fringe impacts are inside the mapped floodplain and difficult to estimate accurately without a survey and plans, so the DEIS does not quantify these specific impacts. The EIS should define the importance of these areas, and discuss qualitatively the effects of the alternative.	We have included an expanded statement in the Final EIS about floodplains and floodfringe in Section 3.10.4. A detailed floodplain analysis will occur at the design phase. See the response to comment L54.FL-1.
L54	FL	3	Steward and Associates Agency: Sensible Solutions Coalition	Floodplains for minor streams, wetlands, and closed depressions are not mapped, but according to King County code, they should be determined on an individual project basis. Impacts to these minor floodplains are not included in this study. The EIS should define the importance of these areas, and discuss qualitatively the effects of each alternative.	We have included an expanded statement in the Final EIS about closed depressions, and unmapped floodplains in Section 3.10.4. A detailed floodplain analysis will occur at the design phase.

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L54	FL	4	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS asserts that all projects would avoid floodway areas (p. 3.10-2). Any projects passing through a floodplain would meet each of the local jurisdiction and FEMA requirements for locating in the floodplain, such as no obstruction in the floodway that would raise the flow height above the zero rise of the flood elevation. Existing development regulations are only "somewhat protective" of flood fringes (Reiser et al 2000). This ignores effects from the existing roadway on the flood rise. Deferring to local regulations also omits consideration of the adequacy of the regulations and subsequent enforcement to provide adequate protection of the environment. Few jurisdictions in the Study Area have adequately protected frequently flooded areas (WCTED 1998).	This EIS discloses impacts related to the alternatives. Past infringements on floodplains were not analyzed in this EIS and are outside the scope of this document. However, localized flooding will be taken into consideration during project design. In addition, this EIS assumes that the local existing/ approved flood regulations are the most current, adequate standards on which to base a comparative analysis of the alternatives. To study all flood regulations for their adequacy would be beyond the normal, reasonable requirements of an EIS.
L54	FL	5	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS notes that potential permanent impacts to floodplains include: (1) the permanent loss of flood storage caused by the road fill, additional pavement, and storm drainage treatment areas, (2) loss of ecological functions related to wetlands, vegetation, and wildlife. The DEIS also notes possible temporary losses in the construction area, primarily losses of ecological functions due to soil compaction and lost vegetation. However, the DEIS does not establish any basis for these effects. Given that consideration is given only to impact to lineal feet of floodway, the DEIS provides no framework for assessing the effects, especially given the difference in floodways.	The commentor has quoted a section from the EIS about "potential" impacts to floodplains. These impacts are "typical" effects that could occur with construction in and near floodplains. To the best of WSDOT's ability, a worst-case scenario was evaluated in the EIS, using a footprint of projects in the I-405 Corridor Program. Should construction occur in this footprint, flood storage and habitat could be lost. If lost, mitigation would occur.
L54	SH	1	Steward and Associates Agency: Sensible Solutions Coalition	I-405 DEIS Section 3.11 Shorelines The analysis assumes that when necessary, shoreline protection and preservation, public access, and habitat enhancement can be maintained or improved as part of project development (p. 3.11-1). The DEIS does not provide any information to support this assumption, which goes against the purpose of considering effects. In light of extensive degradation to shorelines (WDNR 2000) and difficulty maintaining many shoreline functions in the face of continued encroachments (AHG 2001, Castelle et al 1994), this assumption appears unwarranted and unsupportable.	The mitigation that will be defined at the project-specific level for shorelines and habitat will be directly based on the impact. The potential areas for effects on shorelines and habitat are identified generally in the Draft EIS. As this is a corridor-level program, the specific mitigation will not be determined until a project-specific technical and environmental review is completed. To further define mitigations prior to 50 percent design of the improvements would not be appropriate or prudent at this time.

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L54	SH	3	Steward and Associates Agency: Sensible Solutions Coalition	In 1995, the Department of Ecology began reviewing the Shoreline Management Guidelines that direct local government development of Shoreline Master Plans (SMPs). This review culminated in Ecology's finding that current SMPs were not adequately protecting shorelines and publishing revised guidelines that included a "path" for ESA compliance (WDOE 2000, NMFS 2000j, USFWS 2000). The EIS should incorporate the protective requirements in Part IV of the Shoreline Guidelines and the additional information in the Aquatic Habitat Guidelines.	Refer to response to comment L38.SH-1.
L54	LU	1	Steward and Associates Agency: Sensible Solutions Coalition	I-405 DEIS Section 3.13 Land Use The DEIS states (page 3.13-4) that most recent residential land capacity analysis indicated that there is land available for 120,000 new residential units and 200,000 multifamily units. During the period from 1997 to 2020, the projected demand for single-family units is 113,000 and for multifamily units is 145,000. The DEIS asserts that, based on these numbers, the study area can absorb the growth (page 3.13-4). This inappropriately omits whether or not concurrency requirements for traffic, schools, and parks can be met as well as impacts to public services not covered by concurrency requirements.	Concurrency requirements are the responsibility of the agency with jurisdiction. At the time of specific projects, the adopted impact fees and concurrency programs will be applied as applicable.
L54	LU	2	Steward and Associates Agency: Sensible Solutions Coalition	The EIS should also consider the effects beyond 2020.	The Final EIS considers effects beyond 2020. Additionally, *Destination 2030*, the regional metropolitan transportation plan, fully reflects the transportation improvements contained in the I-405 Corridor Program Preferred Alternative, and is reviewed under Section 3.23, Cumulative and Secondary Effects, of the Final EIS.
L54	CU	1	Steward and Associates Agency: Sensible Solutions Coalition	Section 3.23 describes cumulative effects. Geographic critical resources scoped for detailed evaluation of cumulative effects included: air quality; energy; surface water; wetlands; fish and aquatic habitat; and farmlands. However, the DEIS relies on Puget Sound Regional Council (PSRC) 20-year projections of growth in households and employment within the central Puget Sound region. These projects provided only a partial basis for evaluating the geographic distribution of potential cumulative effects on critical resources, ecosystems, and human communities without demonstrating that this is adequate for the purposes of this DEIS. Given that the PSRC projections provide only a partial basis for evaluating potential effects, the DEIS should describe what additional information was used. The DEIS also incorporates by references the FEIS for the PSRC's "Vision 2030" without demonstrating that this is adequate for the purposes of the I-405 DEIS.	The geographic distribution of potential cumulative effects was informed primarily by the PSRC 20-year projections of growth in households and employment. Other sources of cumulative effects included the direct effects of the I-405 Corridor Program improvements; other regional actions discussed in Section 3.23.2 of the I-405 Corridor Program Draft EIS; and local, regional, and national actions identified for the scoped critical resources in Sections 3.23.4.1, 3.23.4.2, 3.23.4.3, 3.23.4.4, 3.23.4.5, and 3.23.4.6 of the Draft EIS. The FEIS for *Destination 2030* provides SEPA review for the latest update of the Metropolitan Transportation Plan, which includes the core projects and strategies contained in the four I-405 Corridor Program action alternatives. Following issuance of the Draft EIS and identification of the Preferred Alternative, the PSRC updated and refined *Destination 2030* to fully reflect and incorporate the transportation improvements contained in the Preferred Alternative.

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L54	CU	2	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS provides too little discussion of low-impact development. The DEIS asserts that '[w]hile effective in reducing the level of impact of urban development, it is not at all clear whether there is any set of practical measures that can entirely avoid the hydrologic impacts of urban development" (3.23-57). The DEIS may be applying a standard to low-impact development that is not applied to stormwater BMPs, which also do not entirely avoid the hydrologic impacts of urbanization (WDOE 2001a, Booth 2000). The EIS should consider the hydrologic benefits of maximum feasible application of low-impact techniques, identify resultant hydrologic and biologic effects, and identify suitable mitigation and restoration measures to achieve protection of beneficial uses of water and conservation of ESA-listed species.	The cumulative impacts section of the I-405 Corridor Program DEIS presented a very lengthy review of likely trends and general level of impacts of future development across the study area. Low-impact development is but one of a large number of factors that will influence cumulative impacts of future development within the region. This topic has been given a level of detail appropriate to the regional analysis performed in assessing cumulative impacts.
L54	CU	3	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS provides no basis for the assumption of '[a] medium-low (average) housing density of 4 homes per acre" in the Study Area (page 3.23-58) nor why such an assumption is necessary. The EIS states that comprehensive plans and zoning ordinances were considered, and these sources provide the relevant information about planned development intensity in the jurisdictions in the Study Area. This information could be combined with results from a survey of recent building permits. Density varies from a high of 13 persons per acre in Lynnwood to a low in Bothell, which has low person/acre and large residential lots. Using accurate, realistic density figures has important consequences to salmon recovery and the feasibility of transit. Regarding salmon, impervious surface varies with intensity of development (Booth 2000), and increasing density is an obvious land use tool to protect habitat (USEPA 2001). Regarding transit, studies indicate that residential density greater than seven dwelling units per acre appears to be a threshold above which transit use increases sharply (Pushvarev and Zupan cited in USEPA 2001). Employment density at trip origin and destinations is also a significant predictor of transit use (Frank and Pivo cited in USEPA 2001).	The cumulative impacts focused on the entire study area, since the specific, baseline growth patterns within the numerous jurisdictions are not known well enough to warrant stream basin-level disaggregation. The I-405 Corridor Program Draft Land Use Expertise Report indicates that an average future housing density is likely to be four to six units per acre within the study area. The cumulative impacts discussion for water resources assumed four units per acre with an impervious area (IA) factor of 40 percent. (The 1992 King County Stormwater Manual suggests 42 percent IA for 4 units per acre.) Cumulative growth in housing within the study area is reported as 90,600 housing units. Using the 40 percent factor and four units per acre calculates to 9,060 acres of IA. The 1992 King County Stormwater Pollution Control Manual suggests 52 percent impervious area (IA) for six units per acre. If future residential density is assumed to be six units per acre, the IA calculates to 7,850 acres, about 1,200 acres lower than the estimate in the I-405 Corridor Program DEIS. This would represent an 11 percent reduction in the overall IA estimate of 10,500 acres. This does not substantially change the conclusion in the I-405 Corridor Program DEIS that future baseline development will add a large amount of new impervious surface within the study area, resulting in substantial adverse impacts to water resources.

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L54	CU	4	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS finds: None of the action alternatives would contribute substantially to altering the negative trends in salmon populations discussed in Section 3.8.5.2. After several tens of thousands of years of sustained viability through natural fluctuations, the DEIS states that the recent sharp downward trend in salmon populations has corresponded to the rapid increase in human population. The high rate of population growth has driven all of the acute adverse impact mechanisms in the study area and the Puget Sound ESU, including, most notably, habitat alteration. Because the human population of the Puget Sound ESU is expected to increase by well over one million in the next 30 years, reverses in the decline of salmonid populations cannot reliably be assumed, regardless of which I-405 Corridor alternative is implemented. This is counter to one of the purposes of NEPA, which declares a national policy to encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man (42 U.S.C. 4321). Some evidence suggests that fish and wildlife populations suffer or disappear in the face of rising human populations (Leakey and Lewin 1996); marine species in the environs around the study area show a similar trend (West et al 1994); and salmon populations are no exception (Nehlsen et al 1991). However, numerous studies of salmon generally (MacDonald et al 2001, Lichatowich 1999, NRC 1996, Lichatowich et al 1995) and salmonid populations in the Study Area specifically find that recovery is possible (King County 2001a, 2001b, 2000, Muckleshoot Indian Tribe 1999). The DEIS cites some of these documents, and the FEIS should reflect a full inclusion of the data, analysis, findings, and recommendations to recover salmonid populations in the Study Area.	Although population growth is the driving force behind the adverse impacts, the I-405 Corridor Program responds to growth rather than causing it. No transportation alternative is likely to result in an equilibrium or reduction of the population of the Puget Sound region. The I-405 Corridor Program EIS does not intend to suggest that recovery of listed salmon is impossible. In fact, the goal to encourage productive harmony between man and his environment is being pursued through the I-405 Corridor Program's identification of potential mitigation measures throughout the Final EIS, as well as through the corridor environmental program and early action mitigation process which are summarized in Appendix J of the Final EIS and are incorporated into the EIS by reference. The I-405 Corridor Program Final EIS, corridor environmental program, and early action mitigation process collectively address the available data, analyses, findings, and recommendations at the appropriate level for this level of planning and analysis.
L54	CU	5	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS does not present any apparent effort to consider cumulative effects per CEQ's 1997 updated guidelines. These guidelines provide a framework for advancing environmental impact analysis and present practical methods for addressing coincident affects so that federal resource managers can avoid, minimize, and mitigate adverse effects (CEQ 1997). The FEIS should follow this approach in order to identify an alternative that can improve environmental conditions.	The analysis of cumulative effects in the Draft EIS is consistent with the CEQ regulations 40 CFR 1500 – 1508 implementing the procedural provisions of NEPA, and is based directly on CEQ's 1997 publication "Considering Cumulative Effects Under the National Environmental Policy Act" and EPA's 1999 guidance, "Consideration of Cumulative Impacts in EPA Review of NEPA Documents". Absent identification of specific elements of the analytical approach that you did not find in the EIS, it is not possible to respond further here.

Code Number			Name	Comment	Response
L54	FATE	17	Steward and Associates Agency: Sensible Solutions Coalition	Numerous versions of this expertise report exist, and raise the question of whether revisions support particular alternatives rather than identify effects and means to avoid, minimize, mitigate, and offset those effects. WDOT has provided a version of this report "revised August 2001." The list of I-405 Corridor Program Discipline Studies in Section 11 of the DEIS refers to reports from April 2001. The consultant, David Evans and Associates, prepared previous versions in February 2001 and sometime in the fall 2000. While revisions are part of the process of considering environmental conditions and analyzing the effects of alternatives, changes from the February 2001 version to the August 2001 report significantly underplay direct, indirect, and cumulative impacts of the alternatives and differences among the alternatives. Specifically, the February 2001 version identified results showing that Alternatives 3 and 4 may result in population increases in the study area and reduced growth in Seattle, and recognized the adverse effects to fish populations and habitats. This finding is not in the August 2001 report, although no changes to modeling assumptions or evaluation criteria are indicated. The February 2001 report also acknowledges the significant adverse cumulative impacts on fish populations and habitat; the August 2001 report defers any discussion of cumulative effects to a generic appendix that provides little discussion of cumulative impacts to the "critical" fishery resource. Section 3.23 in the DEIS does discuss cumulative, adverse impacts to fish populations and habitats, but the Fish and Aquatic Habitat Expertise Report provides no such discussion nor avoidance, minimization, and mitigation measures to prevent and reverse the declining trends.	Discussion of cumulative impacts to environmental resources was deliberately consolidated into Section 3.23 of the Draft EIS in order to allow for a more comprehensive discussion. Older, unpublished draft reports should be considered incomplete and obsolete.
L54	FATE	18	Steward and Associates Agency: Sensible Solutions Coalition	The Fish and Aquatic Habitat Expertise Report does not provide any biological or ecological goals or criteria to evaluate progress or success. There is little discussion of monitoring, which is essential to verify progress towards goals (Reeves et al 1991).	See response to comment L38.FATE-1.

Code Number			Name	Comment	Response
L54	FATE	19	Steward and Associates Agency: Sensible Solutions Coalition	The Fish and Aquatic Habitat Expertise Report provides little information on aquatic habitat. The report does not define or characterize comprehensively aquatic habitat. Sections 4 and 5 of the report describe impervious surface, stream crossings, and riparian encroachments by basin. Aquatic habitat features important to salmonids include pool-riffle ratios, availability of off-channel habitat, number and size of large woody debris, availability of food, and space for adequate expression of life history requirements (Spence et al 1996, Bjornn and Reiser 1991, Healey 1991).	Section 4.1.2 of the Draft Fish and Aquatic Habitat Expertise Report presents general habitat elements important to salmonid species. Section 4.2 of the report includes available reference information on existing conditions by basin for specific habitat elements, including flood plain connectivity, large woody debris, riparian disturbance, water quality, migration barriers, pool frequency, channel scouring, and substrate. Habitat descriptions on a smaller, more site-specific basis would be prohibitively detailed for the large study area and complex program, and are not called for at this level of analysis. Alternatives can be compared based on overall basin-level characteristics.
L54	FATE	20	Steward and Associates Agency: Sensible Solutions Coalition	Summarizing habitat by basin does not provide adequate information to inform decisions about impact avoidance or suitable mitigation for the I-405 Corridor alternatives. Most conditions are influenced at site, reach, and river basin scales, and adequate analysis must consider effects at appropriate scales (Naiman et al 2000, ISG 2000, Rieman and McIntyre 1995, Gregory et al 1991). For example, water temperature influences the distribution of fish species, and is influenced by riparian vegetation, channel morphology, channel volume, drainage density, and hydrologic conditions at a numerous scales (McCollough 1999). Suspended sediment has lethal and sublethal affects on salmonids, and the severity of the effects is influenced by duration of exposure and concentration of sediments, which come from upstream, nearshore, and anthropogenic sources (Newcombe and Jensen 1996). Large woody debris provides important habitat conditions that contribute to juvenile rearing success (Roni and Quinn 2001, Sharma and Hillborn 2001, Martin and Benda 2001), determines channel form in small streams and forms important habitat for many species of stream fish (Bilby and Bisson 1998), and has both short-term and long-term effects on fish populations (Hicks et al 1991).	Although much detail is lost by elevating existing conditions and impact assessment to the basin level, working at this larger scale corresponds to the scale of the study area and the programmatic nature of the EIS. Describing site-specific existing conditions and potential impacts for the entire study area for each of the hundreds of individual projects would be prohibitively detailed, and is not necessary for a broad, programmatic level comparison of alternatives.

Code Number			Name	Comment	Response
L54	FATE	21	Steward and Associates Agency: Sensible Solutions Coalition	The Fish and Aquatic Habitat Expertise Report provides little information about how I-405 affects and influences the conditions in the study area. Summarizing information at the basin level precludes assigning conditions and effects to site-specific causes. Some information specific to I-405 is included, such as the number of fish-passage barriers the highway creates. Much basin specific information, such as how I-405 reduces recruitment of large woody debris, precludes channel migration, increases water temperatures, adds sediment and chemical contaminants from inadequately treated stormwater, and increases peak flows and scour due to inadequately detained stormwater, is lacking.	Basin-specific analyses that isolate the effects of the I-405 roadway were not generally found in the literature search. Because the study area is a broad corridor centered on I-405, the discussion focused on broader scale rather than on that particular roadway. However, additional information on the general hydrologic effects of existing untreated runoff is included in the Surface Water Expertise Report and EIS Water Resources section.
L54	FATE	22	Steward and Associates Agency: Sensible Solutions Coalition	The Fish and Aquatic Habitat Expertise Report should, but does not, integrate the findings of relevant expertise reports. In the absence of an Ecosystem Expertise Report, fish and freshwater ecosystems integrate the effects of shoreline conditions, surface and groundwater, flooding, wetlands, and upland vegetation (WDNR 1999, Naiman and Turner 2000). Effects to any of these aspects of the environment may appear insignificant when viewed in isolation; when integrated with other effects and considered in light of declining chinook populations, effects may be significant.	The Draft Fish and Aquatic Habitat Expertise Report was coordinated with the surface water, land use, and upland habitat analyses.
L54	FATE	23	Steward and Associates Agency: Sensible Solutions Coalition	The Summary states that while intended to assist decision-makers with their comparison of alternatives for potential impact to the environment, the summary also states that for any alternative selected, more detailed project-level analysis is required. Consequently, the report provides very little information to assist decision-makers with their comparison of alternatives.	The Draft EIS and expertise reports provide program-level information that should allow the reader to determine the differences in potential impacts among the action alternatives, which are each broad programs composed of hundreds of individual projects. As projects approach actual design and implementation, each project will be required to undergo analysis at a level of detail that is currently impossible since the project is not yet fully designed, and that is currently prohibitive (cost, time required, sheer volume of detail) when the full detail of several hundred projects is aggregated. However, the lack of project-level detail at this stage does not preclude the well-informed choice of a Preferred Alternative for the corridor. Also see response to comment L41.FATE-4.

Code Number			Name	Comment	Response
L54	FATE	24	Steward and Associates Agency: Sensible Solutions Coalition	The Council on Environmental Quality's (CEQ) regulations implementing NEPA (40 CFR Sec. 1502.24) specify requirements for methodology and scientific accuracy of environmental impact statements as follows: Agencies shall insure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements. They shall identify any methodologies used and shall make explicit reference by footnote to the scientific and other sources relied upon for conclusions in the statement. The Expertise Report (Section 3) relies on Geographic Information System (GIS) data drawn from King County in 1999. In light of rapid conversion from pervious to impervious surface that results in urban areas (Booth 2000), the FEIS should use more recent information, and implement a method for updating the information regularly. The Expertise Report and DEIS fail to disclose how the decision will incorporate and consider new information.	The analysis was based on the most current and complete GIS data available at the time. This information is adequate to allow comparisons of the alternatives, as it is unlikely that existing conditions would change drastically enough to shift the relative magnitude of impact across such a broad study area. Continuous updating of incremental changes in existing conditions during the EIS process would be impossible, implausible, inconsequential, and is not required by regulations.
L54	FATE	25	Steward and Associates Agency: Sensible Solutions Coalition	Deferring decisions to project-level reviews fails to consider the indirect, secondary, and cumulative effects of the decision.	Programmatic cumulative effects are discussed in Section 3.23 of the Draft EIS.
L54	FATE	26	Steward and Associates Agency: Sensible Solutions Coalition	The Fish and Aquatic Habitat Expertise Report considers all project-area streams regardless of fish presence. This is a positive attribute of the report. Many efforts distinguish between fish-bearing and non-fish-bearing streams, and assign lower protection to the latter category (NRC 1996). Both fish-bearing and non-fish-bearing streams are part of the ecosystem, and providing equal consideration is appropriate (AFS/SER 2000, Pollock and Kennard 1998).	Your comment is acknowledged.
L54	FATE	27	Steward and Associates Agency: Sensible Solutions Coalition	The Expertise Report relies on the basin classification in the King County GIS. This classification does not correspond with independent populations of chinook salmon in the study area (Ruckleshaus et al 2001), geomorphically significant units (Montgomery and Buffington 1997), or the scale at which biological or hydrologic changes occur (Gregory 1991, May 1997, Leopold 1968). WDOT should revise the analysis to consider the environmental conditions and the effects of alternatives at the proper ecological scale as described in these citations.	The King County basin delineations are useful because they are comparable to basin delineations used in much of the literature cited. Synthesizing impact assessments based on analysis at multiple scales for hundreds of individual projects across the study area would be unnecessarily complex for the purpose of comparing relative potential impact among the alternatives.

Code Number			Name	Comment	Response
L54	FATE	28	Steward and Associates Agency: Sensible Solutions Coalition	The Expertise Report provides an inconsistent definition of the environmental baseline (section 3.1.1). Data is drawn from 1999 King County data, yet the report also states that the No Action alternative includes 60 projects already planned, funded, or otherwise committed. These projects cannot be in the 1999 database, and the report does not explain how the effects are identified and considered in the Expertise Report and DEIS.	See response to comment L41.FATE-1 and L54.FATE-2.
L54	FATE	29	Steward and Associates Agency: Sensible Solutions Coalition	The Expertise Report should, but does not, provide any basis for selecting 300 feet as the distance for considering effects on riparian corridors and conditions. Although this width is greater than the Critical Area Ordinances and Shoreline Master Plan requirements in any of the jurisdictions in the study area (WCTED 1998), the Expertise Report should provide the basis for selecting 300 feet. Presumably, the 300 foot metric is from the National Marine Fisheries Service's critical habitat designation for Puget Sound chinook salmon (65 FR 7768). In fact, the criteria from the Forest Ecosystem Management and Assessment Team (FEMAT 1993) is the greatest of (1) 300 foot slope distance, (2) a distance equivalent to two site-potential tree heights, (3) the outer edge of riparian vegetation, (4) the 100-year flood plain, or (5) the area between the edge of the active stream channel to the top of the inner gorge. In the study area, McArdle (1949) provides a basis for estimating site potential tree height that is approximately 300-350 feet for a mature Douglas fir (Pseudotsuga menziesii). This is similar to historic records and tall trees in King County (Van Pelt 1996 and Van Pelt personal communications).	Although FEMAT and commentors on the listing referenced a number of other potential guidelines for riparian width, the riparian zone was defined by NMFS for chinook salmon as 300 feet (58 FR 68543). The FEMAT analysis proposed a number of alternative guidelines for riparian width (65 FR 7764), and the I-405 analysis used the 300-foot guideline to fill the need for a consistent quantitative number.

Code Number			Name	Comment	Response
L54	FATE	30	Steward and Associates Agency: Sensible Solutions Coalition	The Expertise Report and DEIS should develop and apply a more sophisticated approach to evaluating riparian encroachments. For example, the Lower Green-Duwamish and Sammamish Rivers have wide historic floodplains and channel migration zones (King County 2001a, 2001b) so basing the riparian zone on these conditions may be appropriate. The Cedar River is not in its historic riverbed in the study area (King County 2001b), and poses a special problem to evaluate riparian zone requirements. Some of the fourth order tributaries, such as Bear Creek, North Creek, or Little Bear Creek, have both historic floodplains and confined channels so riparian protections are site-specific. The Rosgen classification method classifies stream segments based on similar geomorphic characteristics such as water hydraulics and material transport (Rosgen 1994). Geomorphic characteristics are influenced by several variables including channel width, depth, water velocity, discharge, gradient, floodplain features, streambed roughness, channel structure, longitudinal profiles, sediment load, and sediment/substrata size (Leopold et al 1992). Comprehensive assessments combine biological and physical features (Naiman 1998). In addition to recognizing the unique conditions of the watershed and appropriate riparian buffer widths, the approach should consider riparian encroachments quantitatively as well as qualitatively. Currently, the DEIS considers a 1 foot riparian encroachment the same as a 299 foot encroachment. Buffer effectiveness is, in part, a function of width (Pollock and Kennard 1998, FEMAT 1993, Castelle et al 1994). Buffers less than 10m are generally ineffective at buffering the environmentally sensitive resource. As buffer width increases, some functions, such as root strength, are met with narrower buffers than other functions, especially large woody debris recruitment and microclimate control.	The current level of encroachment analysis serves the purpose to allow comparison of the potential level of riparian disturbance among alternatives on a consistent basis. Site-specific impact assessment will be performed at the project level. While more site-specific detail would refine the programmatic analysis, this would be beyond a feasible or necessary level of detail for such a broad program over a large study area.

Code Number			Name	Comment	Response
L54	FATE	31	Steward and Associates Agency: Sensible Solutions Coalition	The need to consider quantitative conditions and effects is particularly important given the dire condition of some of the fish stocks in the Study Area. With a population of fewer than 100 spawning chinook, there may be no such thing as "small" or seemingly "insignificant" effects. NMFS' Viable Salmonid Populations Technical Memorandum NMFS-NWFSC-42 (McElhany et al 2000) provides a discussion of the ecological disruptions and challenges to very low populations of salmonids. A diverse suite of processes can cause depensatory density effects at small population sizes (also termed "Allee" effects). At low populations, the inability of potential mates to find one another and increased predation rates when predators are unsatiated, result in high extinction risks for very small populations because any decline in abundance further reduces the population's average productivity, resulting in a steep slide toward extinction. Environmental variation can cause small populations to go extinct when chance events reduce survival or fecundity to low levels for an extended time. The genetic processes that may negatively affect small populations include diversity loss, inbreeding depression and the accumulation of deleterious mutations. Demographic stochasticity refers to random events associated with mate choice, fecundity, fertility, and sex ratios that can create higher extinction risks in small populations relative to large populations. Ecological feedback is similar to density-dependent processes, but it emphasizes the role salmon play in modifying their physical and biological environment and it usually operates at time lags absent from density-dependent processes. Examples include the contribution of salmon carcasses to riparian zone nutrient cycles, and the effect of spawning salmon on spawning gravel quality. Both of these processes can contribute to the success of future salmon generations, but they are only significant at relatively high population densities. Catastrophes are environmental events that severely reduce a population size in a relatively short period of time. None of these issues are discussed in the Expertise Report or DEIS.	See response to comment L41.FATE-4.

Code Number			Name	Comment	Response
L54	FATE	32	Steward and Associates Agency: Sensible Solutions Coalition	The Expertise Report does not disclose the additional effects that highways have on fish and aquatic habitat relative to other human activities. These include changes in thermodynamic sources, surface albedo, hydrologic changes, and reversibility of changes. The thermodynamic input from buildings and structures such as highways likely serves as an additional heat source to streams increasing summer water temperatures (Klein 1979) above the increase due to creating openings in riparian vegetation (Brown and Krygier 1970), which may delay adults returning upstream to spawn, lower spawning success, and have other lethal and sublethal effects (Groot, Margolis, and Clarke 1995). In winter, the thermodynamic changes from buildings and structures such as highways likely lowers water temperatures (Klein 1979) below that due to changes due to creating openings in riparian vegetation (Holtby et al 1989), which entails consequences for juvenile survival during rearing. Albedo refers to the reflectivity of a surface. Coniferous forest, the dominant vegetation type in the I-405 Study Area (Naiman 1998), has a much higher reflectivity than highways (UC Berkeley Heat Island Project 2000). This may lead to different environmental and fishery responses. Urbanization has significant adverse effects on hydrology creating additional peak runoff, reducing base flows, and increasing consumptive uses of water (WDOE 2001, MacKenzie 1987, Vallentyne and Hamilton 1987). Lastly, the Expertise Report should consider the reversibility of the resources per section 7d of the ESA.	The proposed near-term and early-action mitigation efforts by WSDOT during this environmental process serve to identify and mitigate potential cumulative impacts to each ESA species. This EIS process and issuance of the corresponding Record of Decision (ROD) is not an action that requires formal consultation under the ESA. However, FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for consultation on a programmatic level.
L54	FATE	33	Steward and Associates Agency: Sensible Solutions Coalition	WDOT should revise the Expertise Report and DEIS to provide a scientific context for evaluating environmental conditions and how alternatives affect those conditions tailored to watersheds. Scientifically credible strategies may have a variety of configurations, but all will build on the same foundation. It is essential that they describe a strategy for identifying what is possible (scientifically and physically feasible in the longterm), attainable (socially feasible), and sustainable (Independent Science Panel 2000, emphasis in the original). Such a foundation is especially important for the I-405 Corridor and DEIS, which defers much study and mitigation to project-level reviews (Fish and Aquatic Habitat Expertise Report Section 1.2, Section 3.1.3, and elsewhere).	The scientific context for analysis is a sub-basin analysis consistent with local basin plans and WRIA steering committee documents. The purpose of the EIS is not to guide project-level environmental review, but rather to allow comparison of alternatives and disclosure of potential impacts. Also see response to comment L41.FATE-4.

Code Number			Name	Comment	Response
L54	FATE	34	Steward and Associates Agency: Sensible Solutions Coalition	The Expertise Report does not disclose what impacts project-level reviews will avoid or the extent to which WDOT will go to in its effort to avoid impacts. Avoiding impacts is the environmentally preferred approach (USEPA 2001). Given the absence of a scientific framework, threshold conditions, or ecological goals, the DEIS provides no information to consider the extent of impact avoidance. Consequently, the DEIS does not provide an adequate basis upon which to consider the effects of the alternatives.	The programmatic impact assessment treats all projects consistently to allow for overall comparison of potential impacts. It is not known to what extent impacts can be avoided for each of the numerous projects. This will depend on design constraints and site-specific existing conditions. WSDOT will avoid impacts to the extent possible, but this cannot be completely quantified at the programmatic level. Please also see response to comment L41.FATE-4.
L54	FATE	35	Steward and Associates Agency: Sensible Solutions Coalition	The Expertise Report does not disclose the effectiveness of BMPs or provide standards to consider the significance of effects. Reliance on BMPs is unlikely to result in attaining beneficial uses of water or restoring fish habitat and aquatic species (Karr and Chu 2000, May and Horner 1999, Moscrip and Montgomery 1997, Maxted and Shaver 1996). Furthermore, BMPs are seldom 100% effective (Reiser et al 2000, Schueler 1997). Highways are a significant source of polluted runoff (Pitt 1997).	Numerous avoidance and mitigation strategies have been included as part of WSDOT's early-action mitigation program. These strategies will be applied at the project design level, including BMPs that have been determined to be useful for minimizing the likelihood of adverse impacts. Although they are not likely to be 100 percent effective, they are likely to reduce impacts and should thus not be discarded. Please also see response to comment L38.FATE-1.
L54	FATE	36	Steward and Associates Agency: Sensible Solutions Coalition	The Expertise Report does not disclose how project-level reviews will "most efficiently address fish habitat limitations in each basin." The report should explain why efficiency is the correct criteria to select means to address fish habitat limitations. The report should also provide the basis and considerations for determining efficiency.	Section 6.3 of the most current (August 2001) Draft Fish and Aquatic Habitat Expertise Report does not mention efficiency, but states that available information "will be used to focus I-405 mitigation efforts most effectively within each impacted basin." Effectiveness seems to be a self-evident valid concern. However efficiency is also a valid consideration in balancing the regulatory requirements for on-site in-kind mitigation with the requirements for overall basin-level habitat restoration/species recovery efforts. Efficiency means committing resources where they will accomplish the most benefit for the fish and aquatic habitat; this also seems to be a self-evident valid concern. Mitigation discussion is contained in a separate report entitled Fish Summary and Mitigation Report. Its major theme is that I-405 mitigation should coordinate closely with existing mitigation programs including local jurisdictions, WRIA 8, and other organizations in order to avoid duplication of efforts and to build upon existing mitigation plans.
L54	FATE	37	Steward and Associates Agency: Sensible Solutions Coalition	Federal regulations – Section 3.2.1 This section does not consider international fishing treaties to which the U.S. is a signature, and may be affected by fish production in the Study Area. The Pacific Salmon Treaty (PST) commits the U.S. to maintain optimal salmon production, and the Expertise Report should consider how the alternatives considered in the I-405 Corridor may affect the ability of the U.S. to meet its obligation under the PST.	The Pacific Salmon Treaty goals are primarily focused on fisheries take for regulation and protection of chinook and chum salmon stocks. The I-405 Corridor Program has no relevance to fisheries management and level of effort in fisheries take. In regard to habitat and restoration, under the United States Pacific Salmon Treaty, proponents will "use their best efforts, consistent with applicable law, to:

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					a. protect and restore habitat so as to promote safe passage of adult and juvenile salmon and achieve high levels of natural production, b. maintain and, as needed, improve safe passage of salmon to and from their natal streams, and c. maintain adequate water quality and quantity." The I-405 Corridor Program goals are consistent with these goals and will not contribute to the net depression of treaty-protected stocks.
L54	FATE	38	Steward and Associates Agency: Sensible Solutions Coalition	The Expertise Report does not support the statement on page 4-8 that '[c]hinook salmon typically use larger streams for most of their freshwater life stages." The Expertise Report should consider atypical habitat use. The Expertise Report should define or identify 'larger" streams in a biologically relevant context, such as stream gradient, width, channel depth, mean and/or peak discharge, or other relevant factors. The statement begs the question of what waterbodies chinook use for the portion of freshwater life stages not spent in larger streams. The Expertise Report should explain the concept of life stage and consider alternative's impacts to all life stages. The vagueness of the statement does not provide enough information to consider how the alternatives may affect habitat conditions and chinook.	Discussion of chinook life stages is included on page 4-8 of the Technical Expertise Report. The analysis is not intended to be at the level of detail of comprehensive research paper and literature summary. More specific, detailed resources will be utilized in the production of the programmatic Biological Assessment and project-level documents.
L54	FATE	39	Steward and Associates Agency: Sensible Solutions Coalition	The Expertise Report should include more recent inventories than the 1992 WDFW SASSI. Recent work includes annual fish counts performed by citizens in the study area, surveys in academic studies and theses, surveys by WDFW and the Muckleshoot Indian Tribe, Huntington et al (1996), and Myers et al (1998).	The description of species occurrence is based not only on SASSI, but also on various other sources. These include the WRIA 8 & 9 Habitat Limiting Factors Reports, basin plans, and the StreamNet database.
L54	FATE	40	Steward and Associates Agency: Sensible Solutions Coalition	The discussion of critical habitat excludes many relevant considerations that would inform decisions about appropriate effort to avoid impacts, significance of impacts, possible mitigation strategies and conservation measures. For example, the brief mention on page 4-8 discusses only available habitat, and omits features and conditions of the habitat. Those features include space for individual and population growth, food, water, air, light, minerals, or other nutritional or physiological requirements, cover or shelter, sites for breeding, reproduction, or rearing of offspring, and generally, habitats that are protected from disturbance or are representative of the historical geographical and ecological distribution of the species (65 FR 7765). Lastly, the Expertise Report should identify those streams not designated critical habitat.	The discussion of critical habitat has been expanded. No waters within the study area have been excluded from chinook salmon critical habitat.

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L54	FATE	41	Steward and Associates Agency: Sensible Solutions Coalition	The reference to NMFS 1998 on page 4-8 is mistaken; there is no NMFS 1998 in the reference section. Furthermore, the USFWS 1998 reference addresses only bull trout, and does not refer to chinook.	Typographical error has been corrected to change NMFS 1998 to NMFS 1996. The USFWS reference was deleted from this section.
L54	FATE	42	Steward and Associates Agency: Sensible Solutions Coalition	The two reports cited on page 4-8 of the Expertise Report have different criteria for determining effects. The EIS should state how the differences will be reconciled and how the differences affect consideration of alternatives, effects, and mitigation. For example, · Temperature criteria: USFWS specifies a temperature threshold of 47 degrees F, NMFS specifies 57 degrees F for properly functioning; · Pool frequency differ; · Road density differs; and · Subpopulation characteristics: USFWS provides criteria, NMFS does not. The Expertise Report does not support the statement on page 4-8 that "[c]hinook generally require habitat conditions similar to those of other anadromous salmonids." "An Ecosystem Approach to Salmonid Conservation" by Spence et al (1996) supports the similarity as well as numerous environmental criteria and ecosystem conditions that support healthy salmonid populations including chinook. The Expertise Report does not support the statement on page 4-8 that "[d]uring the migration lifestage, they (chinook) require refuge in deep pools with cover such as large woody debris." This minimizes and omits many of the requirements chinook juvenile chinook have while migrating. These requirements include food, water velocity, and off-channel habitat, (Cederholm et al 2000, Cramer et al 1999, Healey 1991). The temperature criteria reported in NMFS (1996) for proper spawning and rearing conditions is 57 degrees F, not 48 degrees F as stated on page 4-8. The baseline conditions by basin should include information about water temperature, and how temperatures affect salmon by all life stages and trajectories.	The NMFS criteria will take priority, because they are specific to chinook salmon. The USFWS citation has been omitted from this section of the final document because it is specific to bull trout. However, it is true that the basic components of salmonid habitat (cold, clean gravels, cover for rearing juveniles, refuge from high flows, etc.) are generally similar for many salmonids.
L54	FATE	43	Steward and Associates Agency: Sensible Solutions Coalition	Page 4-10 mischaracterizes the status of pink (*O. gorbuscha*) and chum (*O. keta*) salmon in the Lake Washington Basin. The hydrologic disruptions that resulted from creating the Ship Canal extirpated pink and chum salmon from the basin (USACE 1999).	The report clearly states that "Pink salmon are not considered to inhabit the Lake Washington/Cedar River watershed" and "no [chum salmon] run is documented in the Cedar/Lake Washington basin." This does not conflict with your statement.

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L54	FATE	44	Steward and Associates Agency: Sensible Solutions Coalition	The Expertise Report fails to note that Lake Sammamish kokanee exist at very low numbers. The USFWS is conducting a status review in response to a petition to list the fish as endangered. The Expertise Report and DEIS should consider the effects of the alternatives on Lake Sammamish kokanee.	Additional discussion of Lake Sammamish kokanee has been added.
L54	FATE	45	Steward and Associates Agency: Sensible Solutions Coalition	The Fish and Aquatic Habitat Expertise Report provides a cursory discussion of baseline conditions (Section 4.2) that omits much available and relevant information. This information would inform decision-makers about achievable goals and avoidable impacts. The University of Washington's Salmon Web conducts physical, chemical, and biological surveys of many waterways in the Study Area including Bear Creek, Big Bear Creek, Coal Creek, Juanita Creek, Kelsey Creek, May Creek, North Creek, Swamp Creek, and the Green River (Salmon Web 2001). This program also discusses the role of biological monitoring and integrity to guide ecosystem restoration goals and actions. Two other programs at the University of Washington, the Center for Streamside Studies and Center for Urban Water Resource Management, have considerable information about the environmental baseline in the study area, impacts to water and fish, and solutions to achieve environmental and social goals. In 1998, King County completed the Regional Needs Assessment (RNA) and Funding Recommendations. These documents provide guidance about surface water management and funding for local governments to respond to the chinook salmon listing. This review provides information about flooding, instream flow, and riparian conditions, and how those conditions affect salmon. It also provides some principles and goals for considering restoration. The Fish and Aquatic Habitat Expertise Report should consider these environmental conditions, goals, and effects the RNA discusses in the Study Area.	The Final EIS baseline conditions summary (Section 3.8.1.1) is intended to provide sufficient characterization for comparison of potential impacts among alternatives. The analysis is not intended to be at the level of detail of a comprehensive research paper and literature summary. More specific, detailed resources will be utilized in the production of the project-level documents and ESA documents if appropriate.
L54	FATE	46	Steward and Associates Agency: Sensible Solutions Coalition	On page 5-12, the reference should be to May 1996; there is no May 1986 in the reference section. The reference is also incorrect; the document is a doctoral dissertation, not a master's thesis.	"May" references have been reviewed and corrected.

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L54	FATE	47	Steward and Associates Agency: Sensible Solutions Coalition	The DEIS should clarify what thresholds apply for consideration of "significant" effects. Citing May 1996, the DEIS notes that: Overall, severe degradation of stream habitat has been found to occur as impervious surface exceeds about 5 percent of the area in a drainage basin. Rehabilitation of habitat is generally likely to be feasible in streams for which impervious surface occupies less than 20 percent of the basin. Performance of fundamental natural ecological functions is likely to be problematic in streams with impervious surface covering more than 45 percent of their basins. This raises two questions (1) when do effects from impervious surface become significant and (2) does the DEIS seek to prevent basins from reaching or exceeding "problematic" levels or is lesser degradation acceptable? In light of the ESA listing and need to recover species, the DEIS should focus on improving ecosystem conditions throughout the range of listed species.	Draft EIS Section 3.8.3.2 shows that all on-site basins except Soos Creek are already beyond the level at which "rehabilitation of stream habitat is generally likely to be feasible." Question 1: Based on May 1996 findings, it was assumed that impacts to basins would be most significant when they increase impervious surface in a basin that is near the 5 percent impervious coverage criterion of "severe stream degradation" or the 20 percent impervious coverage criterion of "feasible restoration." Question 2: The EIS seeks to disclose potential impacts to support comparisons between alternatives, while focusing on the most reasonable level of analysis. The alternatives have varying potential to degrade habitat as discussed in the impact assessment sections of the EIS. More detailed analyis of individual species and basins will be addressed at the project level and during ESA documentation, as appropriate.
L54	FATE	48	Steward and Associates Agency: Sensible Solutions Coalition	Mitigation Measures For construction and operational impact mitigation, the Fish and Aquatic Habitat Expertise Report relies heavily on techniques the Independent Science Panel criticized as insufficient elsewhere in salmon recovery planning in Washington State. Current approaches to storm water management (e.g., detention basins) are insufficient to prevent significant degradation of the resource (ISP 2000).	The Expertise Report has relied on the Independent Science Panel for techniques to mitigate impacts. However, the EIS also acknowledges that the ISP cites (in the same section Managing Urban Stormwater to Protect Streams of their report on the Statewide Strategy to Recovery Salmon) that: "There is nothing concrete in this section that can be identified as sufficient to address this problem for new development– most of the potential actions are vague or remain to be developed." (ISP 2000) Until a better method for stormwater management is developed and approved, the I-405 Corridor Program has used the best available management practices. During implementation, the I-405 Corridor Program will meet the requirements of the Washington State Department of Ecology Stormwater Technical Manual or functionally equivalent guidance, and other applicable state and local codes in regard to stormwater management in the State of Washington. Also see response to comment L38.FATE-1.

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L54	FATE	49	Steward and Associates Agency: Sensible Solutions Coalition	The stated purposes of the Fish Summary and Mitigation Report are 1) to synthesize and summarize the relevant conclusions of these three technical expertise reports (Fish and Aquatic Habitat, Surface Water, and Land Use) with respect to fish impacts, and 2) to identify and prioritize specific mitigation measures that can be taken in each basin as compensation for unavoidable project impacts (Fish Summary and Mitigation Report, Introduction, page 1-1). The report is inadequate for 2 reasons. First, many more factors affect salmon, and require consideration. Second, there is insufficient information to identify "unavoidable" impacts or determine the effectiveness of "compensation."	See response to comment L38.FATE-1.
L54	FATE	51	Steward and Associates Agency: Sensible Solutions Coalition	Air quality can be a source of deposition of pollutants to the water (USEPA 2001), thus it is relevant to fish and aquatic habitat. Economics influences the ability of society and governments to fund habitat protection and restoration (Fujita and Toran 2000, Layton et al unpubl. 1999, Huppert and Kantor 1998). Groundwater is especially important to maintaining dissolved oxygen in salmonid redds (Groot and Margolis eds. 1991). Noise can affect and disrupt juvenile rearing, migration, and spawning behavior (Knutson and Naef 1997). Recreation can affect and disrupt juvenile, migration, and spawning behavior (Clark and Gibbons 1991, Knutson and Naef 1997). Shorelines are extremely important to salmonid habitat, and contribute substantially to formation and maintenance of many riparian and aquatic functions and conditions (Aquatic Habitat Guidelines 2001, FISRWG 2001, Spence et al 1996). Uplands, related to land use, influence watershed-wide conditions such as hydrology (Ziemer and Lisle 1998), ecosystem integrity (Karr and Chu, 2000, May et al 1997), and interactions with other species (Cederholm et al 2000). Wetlands attenuate peak flows, store sediment and nutrients, and contribute to species diversity (Azous and Horner 2001, Schmitten 1999, NRC 1996, Spence et al 1996). The EIS should consider these factors when considering effects to salmon.	While there are potential impacts from these sources, their impact to fisheries is not quantifiable at the programmatic level. The two factors analyzed in the Draft EIS to determine fisheries impacts were appropriate for the level of analysis required. (See response to comment L41.FATE-4.) Groundwater (Section 3.5), noise (Section 3.2), shorelines (Section 3.11), uplands (Section 3.7), and wetlands (Section 3.6) are recognized as important to salmon and are discussed appropriately in the EIS. Air quality (Section 3.1) and economic (Section 3.16) impacts to fisheries are obscure and not likely to be analyzed in project-level review.

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L54	FATE	52	Steward and Associates Agency: Sensible Solutions Coalition	The I-405 DEIS and expertise reports do not identify impacts to any of the resources with sufficient detail to estimate ecosystem and fisheries effects. The inability to "compensate" for unknown effects should be clear enough. The Fish Summary and Mitigation Report compounds this shortcoming by failing to identify any criteria or measurements to establish "compensation." The discussion of "Drainage Alteration History" presents little discussion of how the alterations have affected fish. While restoring lost habitat can guide restoration efforts (Armantrout 2000, Frissel and Ralph 1998), the report does not indicate how mitigation can compensate for the losses.	All impacts are identified with sufficient detail and are appropriate as noted for a programmatic analysis. The programmatic biological assessment and project-level studies will provide a more detailed impact analysis. Compensation is discussed as part of the Early Action Mitigation Strategy. The purpose of mitigation would be to specifically compensate for impacts of the projects in the I-405 Corridor Program. Also refer to response to comment L38.FATE-1. Drainage alteration history discussion is intended as part of the existing condition description.
L54	FATE	53	Steward and Associates Agency: Sensible Solutions Coalition	The report does not provide any citation or criteria for the statement that "Bear Creek and the Cedar River maintain relatively healthy (chinook) populations." If the populations are healthy relative to the nearly depleted stocks elsewhere in the Lake Washington basin, Puget Sound or depressed populations in Washington, Idaho, California, and Oregon (Myers et al 1998), the comparison does not provide useful information. Huntington and others (1996) did not list the Cedar River chinook among healthy populations. The NRC (1996) found that although status reviews are often written by fishery scientists, political pressure exists to classify salmon stocks as at risk or healthy. A basin containing both healthy and depressed populations presents a challenge the state has yet to resolve: prioritize efforts to protect healthy populations or restore diminished ones? (ISP 2000) The Fish Summary report, DEIS, and Expertise Reports do not provide any guidance, consideration, or effects of such a choice.	Section 4.2.8 states that Bear Creek is "relatively productive among Puget Sound salmon streams… "with reference cited, and cites a document reporting "high quality salmon habitat" in the headwaters. The purpose of the EIS is to demonstrate relative impacts, not resolve the state's challenges.

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L54	FATE	54	Steward and Associates Agency: Sensible Solutions Coalition	The discussion of baseline conditions in section 2.2 does not provide information about the habitat conditions that the Fish Summary and Mitigation report says are important. Habitat complexity is generally a major factor in meeting survival requirements for all salmonids. Key features of habitat complexity include interspersed deep pools and shallow gravel riffles, abundant woody debris in the channel, and a forested riparian area to stabilize banks, provide shade, and provide organic inputs. Relatively cool water is generally a requirement for all life stages. Other factors that affect habitat quality include water regime alterations due to stormwater runoff from impervious or cleared areas, sediment deposition of potential spawning habitat and competition from introduced exotic fish. (Section 2.1.2) The baseline conditions discusses impervious surface by basin and water bodies that do not comply with state water quality standards from the 303d list. This does not present information for most of the factors the report claims are important for fish. Furthermore, the report discusses habitat factors in a qualitative way, when the report should have used specific criteria for these factors available from many sources (NMFS 1996, Spence 1996, Groot et al 1995, Bjornn and Reiser 1991, Groot and Margolis 1991).	Although the EIS and Technical Expertise Report refer to many important factors, including complexity of pools, riffles, woody debris, etc., that contribute to the survival requirements of salmonids, this programmatic EIS intends only to provide sufficient characterization of the resource for comparison of potential impacts among alternatives. At this phase, detailed discussion about each major habitat condition of each individual stream as it relates to an individual project would not be reasonable or feasible and would not substantially contribute to the environmental decision-making process. Many of the habitat conditions mentioned by the commentor are dynamic and will need to be assessed during the project-level analysis, when site-specific mitigation correlates directly with design. The analysis used in the EIS uses two key factors (impervious surface and encroachments) that are intentionally broad, qualitative in nature, and inherently associated with many of the complex conditions mentioned by the commentor. Please also refer to L54.FATE-45.
L54	FATE	55	Steward and Associates Agency: Sensible Solutions Coalition	The report refers to pesticide contamination in some of the water bodies, but ignores recent studies by the U.S. Geological Survey (Voss et al 1999, MacCoy and Black 1998) that found high concentrations of many pesticide and fertilizer byproducts in urban waters, including several in the study area. Pesticides may interfere with homing and other life history functions of salmonids (Scholz et al 2000). Washington State water quality standards do not extend to contaminants in freshwater sediment, which spawning salmon need to dig redds and incubate eggs.	At the programmatic level, detailed impacts to water bodies from pesticide contamination were not determined. The Final EIS baseline conditions summary is intended to provide sufficient characterization for comparison of potential impact among alternatives. The analysis is not expected to extend beyond that which was scoped to become a comprehensive research paper and literature summary. Information listed in the report is designed to provide a general idea of conditions in each basin, not a detailed analysis. More specific, detailed resources may be utilized in the production of the programmatic biological assessment and project-level documents.
L54	CU	6	Steward and Associates Agency: Sensible Solutions Coalition	The consideration of direct impacts inappropriately excludes indirect impacts and cumulative effects. Other expertise reports, especially groundwater, surface water, and land use, note significant differences in the indirect and cumulative effects of the alternatives. WDOT should select the alternative with the least environmental impact, and mitigation and conservation measures should collectively improve environmental conditions including indirect and cumulative effects.	Please refer to the definitions of direct, secondary, and cumulative effects contained on page 3-1 of the I-405 Corridor Program Final EIS. Secondary (indirect) and cumulative effects are different than direct impacts. These two types of effects are discussed together in Section 3-23 of the Final EIS for each of the alternatives. Your suggested objective of least environmental degradation is being pursued through the corridor environmental program and early action mitigation process.

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L54	FATE	56	Steward and Associates Agency: Sensible Solutions Coalition	Section 3.2 misstates WDOT's stormwater management policy. WDOT uses its Highway Runoff Manual (HRM; 1995) to establish construction and operational stormwater best management practices (BMPs). This manual must be technically equivalent to the Ecology manual, but it contains differences. Furthermore, the HRM has thresholds and provisions for exemptions, so the provisions would not necessarily apply to "every new road and highway project as part of each alternative." (This language suggests WDOT has already dropped consideration of Alternative 1, which includes high capacity transit.) Ecology has updated its Stormwater Manual, and WDOT will have to update its HRM to be technically equivalent within 2 years. The current draft HRM does not accomplish this task. The Ecology Manual also states clearly and frequently that reliance on BMPs alone will not be adequate to protect beneficial uses of water or salmonids. While this report is an effort to identify additional steps WDOT may take, WDOT should explicitly acknowledge the shortcomings in the BMPs, consider selecting the environmentally preferred option, and include additional conservation measures.	WSDOT has committed to use the Ecology stormwater manual or functionally equivalent guidance for the projects in this program and will identify specific mitigation during project-level design or during early action mitigation, as appropriate.
L54	FATE	57	Steward and Associates Agency: Sensible Solutions Coalition	Section 4 correctly notes that avoiding impact is the most effective mitigation strategy. Unlike elsewhere in the DEIS and expertise reports, this report states "avoiding impacts will be addressed first by Alternative selection, and later in the design of specific projects. Impacts to fish and aquatic habitat will be considered in the selection of an Alternative." Unfortunately, how or to what degree the DEIS co-leads will accomplish this is not stated. This leaves the decision makes and reader without any guidance or criteria to make the decision. Section 4 on mitigation, like other components of the DEIS, does not provide any criteria for deciding when impacts are unavoidable. The section should provide criteria or some indication of the effort WDOT will make to avoid impacts.	Additional context for impact avoidance is being developed as part of WSDOT's Early Action Environmental Impact Mitigation strategy.

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L54	FATE	58	Steward and Associates Agency: Sensible Solutions Coalition	The Fish Summary report states "[w]here impacts to fish and habitat are unavoidable, mitigation would be provided by compensating for lost habitat functions." The Summary Report does not define or explain the term "habitat functions," nor does it demonstrate the feasibility of compensating for lost functions. Habitat functions are complex and often interact with one another in a stochastic manner. Synthesizing habitat functions requires considering historic habitat conditions and changes, ecosystem processes, and the life history of salmon (Cramer et al 1999).	See response to comment L38.FATE-1.
L54	FATE	59	Steward and Associates Agency: Sensible Solutions Coalition	On-site/in kind mitigation assures that the specific lost environmental functions (such as suitable spawning habitat for a specific fish species) can be replicated as closely as possible. The statement "as closely as possible" still allows for loss of habitat function. Given that this loss is occurring after "unavoidable impacts," the magnitude of the loss is greater. WDOT must improve environmental conditions for fish, water quality, and humans.	Your comment is acknowledged.
L54	FATE	60	Steward and Associates Agency: Sensible Solutions Coalition	The Fish Summary Report should state which regulatory agencies believe that on-site mitigation may be less effective in a highly urbanized area where pre-existing watershed conditions prevent restoration of good quality salmonid habitat. In these areas, they suggest that off-site and/or out-of-kind mitigation elsewhere in the sub-basin or watershed would be a more effective and efficient use of mitigation resources. The Summary Report should also provide the criteria or framework for determining "more effective and efficient use of mitigating resources." Expanding "off-site/out of kind" mitigation to encompass an entire watershed may involve efforts such as preservation of higher-quality habitat in locations upstream of the study area. Preservation does not maintain or increase habitat functions when an I-405 project has resulted in impacts.	The I-405 Corridor Environmental Program describes mitigation policies and guidance that will be used in determining mitigation efforts throughout the I-405 corridor. Please also refer to L38.FATE-1.

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L54	FATE	61	Steward and Associates Agency: Sensible Solutions Coalition	Appendix A to the Fish Summary does not contain the policy guidance memorandum for evaluating aquatic habitat mitigation approaches. If WDOT intends to rely on this approach as part of the mitigation strategy, WDOT should present the policy in full, as well as an evaluation of the policy development and implementation. The brief discussion of the policy notes that agencies must "consider" whether the mitigation provides equal or better functions and values. The policy does not require agencies to pursue options that provide equal or better ecological functions and values. Policy guidance may not create requirements or allow for third party enforcement.	The policy guidance memorandum has been added to the Final EIS with reference to the Fish Summary and Mitigation Report.
L54	FATE	62	Steward and Associates Agency: Sensible Solutions Coalition	Regarding sub-basin level mitigation, WDOT may consider participating in some projects to contribute toward restoration of sub-basins and watersheds while gaining mitigation credit for impacts within the I-405 Corridor. Presumably, WDOT will have to do more than simply "consider" participating. Furthermore, WDOT will have to establish that the mitigation, or conservation measures in ESA terms, will have some relationship to the impacts.	Please refer to second paragraph of page 4-10 in the Fish Summary and Mitigation Report. Also please see response to comment L38.FATE-1.
L54	FATE	50	Steward and Associates Agency: Sensible Solutions Coalition	This section establishes a scientific framework to guide the assessment of environmental conditions and consider the possible effects of the I-405 Corridor on the environment. Salmon restoration involves shifting from the egocentric environmental approach (wherein each part of the ecosystem is managed as a unit) to the ecocentric ecosystem approach (wherein all parts are integrated for management) (Knudsen et al 2000). Scientifically credible strategies may have a variety of configurations, but build on the same foundation. It is essential that they describe a strategy for identifying what is possible (scientifically and physically feasible in the longterm), attainable (socially feasible), and sustainable (ISP 2000, emphasis in the original). The Habitat Limiting Factor reports, discussed below, give an indication of what is possible and sustainable. When combined with information about how the economic value of salmon recovery to people in Washington State and our nation is many hundreds of millions of dollars per year, (Layton et al 1999,	Your comment is acknowledged.

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				Loomis 1999, Loomis 1996), considerable investments are affordable and socially feasible. This section describes ecological goals and sets biological, physical, and chemical objectives consistent with, and derived from, the scientific framework. These goals and objectives consider the direct, indirect, and cumulative effects of the I-405 Corridor Alternatives (40 CFR 1508.8 and 1508.7, 46 FR 18026, 50 CFR 402.02, CEQ 1997). They include site-specific, reach-specific, watershed, and regional ecosystem considerations (Naiman and Bilby 1998, Gregory et al 1991). Avoiding impacts is the surest method to protect the environment (USEPA 2001). In order to restore salmonid populations and protect beneficial uses of water, reducing existing impacts is necessary due to the degraded nature of current environmental conditions (NMFS 2000k, NMFS 1999c). In some cases, impacts are unavoidable, so minimizing or reducing the magnitude and severity of those impacts is appropriate. This section establishes thresholds for impacts, and guides decisions about avoidance, minimization, on-site, and off-site mitigation. This section also includes additional conservation measures that should improve environmental conditions. The environment, public works projects, and society are all dynamic. Adaptive management is built into this alternative to guide ways to incorporate new information, technologies, and alternatives into the implementation plan. Successful recovery efforts are guided by the precautionary principle: do no further harm (Noss et al 1997). SCIENTIFIC FRAMEWORK No simple strategy exists for salmonid recovery. Because of competing social, cultural, economic, and biological concerns, a successful salmonid strategy will inevitably be complex and potentially confusing (ISP 2000). An explicit conceptual framework for organizing these complex issues is essential so the public, elected officials, program managers, and natural resource managers can assess whether science and policy are consistent. The ISP identified four key scientific components: (1) sound conceptual foundations, (2) guiding principles, (3) implementation of	

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				strategies to achieve watershed-specific recovery objectives or risk-averse alternatives, and (4) defensible methods for assessing effects and success. ECOLOGICAL GOALS In urban areas, reconciling continued economic growth with restoring water quality and healthy salmon runs has not been an easy task. Local governments led by King County, business groups, conservation groups, and Native American Tribes convened the Tri-County ESA Response Effort with the goal of restoring salmonid populations in King, Pierce, and Snohomish counties to harvestable levels (Tri-County ESA Response Effort Vision Statement and Goals 1999). Such a comprehensive goal should lead to specific actions to promote the restoration of natural ecosystem functions, which supported the evolution and survival of salmonids (Spence et al 1996). Many past and ongoing restoration efforts target one or a few factors, and failure to consider all relevant factors may be why efforts have failed to keep up with the degradation of ecosystems, prevented continued declines, or unintentionally contributed to both (Lichatowich et al 1995). BIOLOGICAL, PHYSICAL, AND CHEMICAL OBJECTIVES Both the research done with biological monitoring (Karr and Chu 2000, May et al 1997) and physical and chemical conditions (Bauer and Ralph 1999, Spence et al 1996; Healey 1991, Bjornn and Reiser 1991) suggest thresholds for certain conditions. Listed in no particular order, these include: Watershed level · 5% maximum watershed impervious surface; · 85% watershed vegetative cover, at least 50% of which is similar to potential natural community; · Drainage density (road network, artificial channels) less than 25% increase over historic; · Water temperature less than 58 degrees F; · No manmade contaminants; · Sediment regime similar to predisturbance conditions; Watershed hydrograph indicates peak flow, base flow, and flow timing similar to undisturbed watershed with comparable size, geology, and geography;	

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				Riparian level · 1 break or fewer per km in riparian corridor; · Riparian buffer greater than 100 m; · No increase in natural drainage density in active or historic floodplains; · Connected wetlands; · Water velocity within the range that does not disrupt salmonid behavior; · Width/depth ratio <10; · Pool frequency and depth sufficient for productive spawning and rearing, Site level More than 90% natural streambanks with native vegetation; In the many areas that already exceed these limits, no further degradation should occur. For projects, such as I-405, which envision increasing these disturbances and alterations, avoidance and net reductions should guide alternative selection and development as well as restoration efforts. Developing targets can influence implementation. For example, American Forests assessed forest conditions in the Puget Sound, and recommended 40% tree cover in urban areas such as Bellevue (American Forests 1999). While this is below the thresholds discussed above, it is an increase over existing levels and is achievable. Additional efforts are necessary to achieve functioning ecosystems. King County has developed several assessments and plans that address surface water management, non-point pollution reduction, and impervious surface and watershed development: subbasin plans, Regional Needs Assessment, Lower Cedar River Basin and Nonpoint Pollution Action Plan. An independent scientific analysis of the salmon production estimates in the Lower Cedar River Basin and Nonpoint Pollution Action Plan found that the estimates were somewhat optimistic, but within the range of salmon production estimates (Blaylock 1998). King County, in concert with the state and others, has released Habitat Limiting Factors Reports and Reconnaissance Plans (LFR) for both watersheds in the I-405 Study Area. The LFRs provides an assessment of the existing salmonid species in the	

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				watershed, habitat conditions that limit the natural production of salmonids, and guidance for policy makers to determine next steps and direct resources for the recovery process. Any alternative for the I-405 Corridor, including the no action alternative, must leave open the option and ability to achieve meaningful restoration of the ecological functions in the area. Numerous reports by federal, state, local, and private entities note the degraded environmental conditions in the I-405 study area including many caused by I-405. Any action that precludes recovery will fail the ESA test because precluding recovery is a sufficient criterion for determining that a project is adversely modifying critical habitat for ESA-listed species (NMFS 1999c) IMPACT MINIMIZATION Best Management Practices (BMPs) are a necessary, but not sufficient, aspect on minimizing direct construction and operational effects of I-405 on water quality and fisheries. No evidence demonstrates that sole reliance on BMPs will achieve water quality or fisheries objectives (WDOE 2001, May and Horner 1999, Maxted and Shaver 1996). Consequently, the citizens' alternative includes additional measures, largely identified in previous and ongoing salmon and environmental planning efforts. Minimizing impacts starts with developing and selecting an alternative with the fewest environmental effects. Alternatives to road building are available that are sustainable, minimize or eliminate the environmental impacts intrinsic to road building, and meet the transportation needs of affected communities (USEPA 2000). All stream crossings must allow for unimpeded upstream and downstream migration of fishes at all flow levels. In addition to allowing for movement of fish, stream crossings must allow for natural movement of sediment, large woody debris, and channel movement (NMFS 1996). In most cases, this requires the use of bridges rather than culverts. In some cases, the downstream	

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				mouth of a culvert may be the only available pool habitat in a stream reach; in such a case, managers should weigh the value of the pool versus the value of the habitat above the culvert before removing the culvert (Rod Malcom, personal communications). MITIGATION AND CONSERVATION REQUIREMENTS This is a list of regulatory and programmatic improvements intended to protect and restore salmon habitat in the Study Area. Local government planning and regulations: · Shoreline Master Plans updated with Part IV of DOE's Shoreline Guidelines (2000) and Aquatic Habitat Guidelines (2001) by 2004; · Critical Area Ordinances and Comprehensive Plans updated according to the best available science in WDFW's "Management Recommendations: Riparian" (1997), Spence et al 1996, and other appropriate sources by 2003; · Water conservation should be a mandatory term of service, and programs should be more comprehensive than Seattle's plan; · Low-impact design should become the standard land use practice specified in zoning regulations, and building codes; · Stormwater management per NPDES phase I permit and Stormwater Management Manual for Western Washington for all jurisdictions within the I-405 study area by 2003; · Funding for full implementation of protection and restoration measures identified in WRIA plans, Limiting Factor Reports (King County 2001 a,b), Reconnaissance Plans, Green-Duwamish Restoration Plan (King County 2000), Lower Cedar River Basin and Nonpoint Pollution Action Plan (King County 1998), Regional Needs Assessment by 2016. With salmon populations in the Study Area on the brink of extinction, significant improvements to environmental and ecosystem management are necessary. The section outlines a scientific framework and specific actions intended to reverse the declining trend of salmon habitat and populations. These trends have been long to develop, and will require a long time to reverse. This section and these comments are intended to provide a scientific grounding and help bring about the improvement in salmon habitat and population in the DEIS Study Area.	

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L55	O	1	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	Thank you for the opportunity to comment on the draft EIS for the I-405 Corridor Program for Central Puget Sound. We share the Department of Transportation's concern for congestion relief, freight mobility and improved air quality. Our comments are intended to help the decision makers improve air quality, protect the public health, select the best alternative, and achieve compliance with state and federal Clean Air Acts.	Thank you for your comment.
L55	AQ	1	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	We have four major concerns regarding the draft EIS. There should be more focus on: -- particulate matter and ozone -- construction impacts -- quantification of the air quality impacts -- mitigation measures	These issues are addressed in Sections 3.1.4 and 3.1.5 of the EIS.
L55	AQ	2	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	Particulate matter and ozone pollution are a greater concern than carbon monoxide pollution for a number of reasons, ambient levels of carbon monoxide have declined over the last 20 years and are projected to continue declining. We are at risk for violating National Ambient Air Quality Standards for ozone and particulate matter over the next ten years. Both ozone and particulate matter pose health risks because they contain toxic chemicals. Central Puget Sound has some of the highest levels of toxic chemicals, such as benzene, in the country.	Ozone has been considered in detail in the EIS by evaluating the regional emissions of ozone precursors for each of the alternatives. As a result of including the Preferred Alternative in the latest analysis of the MTP by PSRC, the Puget Sound region's MPO, the Preferred Alternative has been shown to conform to the regional air quality maintenance plan for ozone in 2020 and 2030. The project corridor is outside all Puget Sound region particulate matter non-attainment and maintenance areas; therefore, analysis of particulate emissions is not required under the Clean Air Act or WSDOT Environmental Procedures Manual. Section 3.1.4 of the Final EIS includes qualitative comparison of construction-phase pollutant emissions for each of the alternatives. At this stage, exact project elements and phasing have not been defined; therefore, it is not possible to determine timing and quantities of particulate emissions in greater detail.
L55	AQ	3	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	Construction impacts on air quality require closer investigation and further quantification. Emissions from diesel construction vehicles and equipment pose significant air quality and health risks as diesel particulate matter is a probable human carcinogen. These impacts cannot be considered temporary because of the anticipated 20-year construction period. The differences between alternatives, in cost, ranging from $3 billion to $11 billion, and construction energy consumed, require investigation into likely related differences in air quality impacts during their construction.	The Final EIS includes qualitative comparison of construction-phase pollutant emissions for each of the alternatives. At this stage, exact project elements and phasing have not been defined; therefore, it is not possible to determine timing and quantities of particulate emissions in greater detail. Once a preferred alternative and specific projects are advanced into the project-level design phase, construction impacts and appropriate construction mitigation will be evaluated in detail. Construction period air quality evaluation

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					requirements would be determined through inter-agency coordination during the detailed evaluation of the individual projects. It is not anticipated that any individual project would have a construction duration greater than 5 years; therefore, under the Clean Air Act, conformity demonstration would not be required during the construction phase of the projects. If any projects are proposed that would have a construction duration of greater than 5 years, the need for construction-phase conformity determination would be determined through inter-agency consultation.
L55	AQ	4	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	Quantification of the air quality impacts should include increased construction-related impacts and more detailed quantification of the air quality impacts of the elements within the alternatives. Identifying the air quality impacts of individual elements within an alternative would help decision makers select a preferred alternative. Case studies or comparative data may provide a way to quantify the air quality impacts of individual elements without forgoing the analysis of the entire package.	See the response to your comment L55.AQ-3 above.
L55	AQ	5	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	Mitigation measures should identify whether they are standard for construction projects or have been specially identified for the I-405 project, and which element(s) of the alternatives they apply to. Existing programs, such as the Clean Air Agency's Diesel Solutions Program, should be identified as potential mitigating measures. Air quality mitigation measures that would also mitigate other environmental impacts should be identified.	Participation in the Diesel Solutions Program has been included as a potential mitigation measure. All identified mitigation measures are appropriate to the I-405 Corridor Program, whether or not they are specially identified for the corridor.
L55	AQ	6	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	We have included two attachments to this letter. The first provides additional mitigating measures and additional discussion of the value of connecting mitigating measures to individual elements within the alternatives. The second provides detailed, page-referenced comments on the DEIS.	Thank you for your comment.

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L55	AQ	7	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	Additional specific Mitigation that should be discussed ULSD & retrofit kits for construction equipment and vehicles: Ultra Low Sulfur Diesel containing 30 ppm or less sulfur content can significantly reduce emissions of particulate matter. In combination with particulate filters as much as 90% of the particulate matter can be removed. WSDOT could require all I-405 contractors to use ultra low sulfur fuel and retrofit their existing diesel powered vehicles and equipment with particulate emissions reduction equipment. Diesel Solutions Program participation: WSDOT could participate in the Clean air Agency's Diesel solutions Program and install emission reduction equipment and use ultra low sulfur diesel in all of its vehicles and diesel equipment. Biodiesel Fuel: Bio diesel fuel can reduce fine particle and carbon monoxide emissions reduce toxic emissions. Biodiesel, made from renewable resources, such as soy beans, is biodegradable, non-toxic and ultra low sulfur. It provides similar performance to petroleum diesel and can be mixed with petroleum diesel. Both WSDOT vehicles and I-405 construction project vehicles could use biodiesel as a mitigating measure. Hybrid transit vehicles: Hybrid Gas/Electric or diesel/electric transit vehicles would significantly reduce fuel consumption and the associated emissions. Replacement of existing transit vehicles with hybrid transit vehicles on some of the routes would reduce particulate matter, ozone and carbon monoxide emissions. Construction Schedule alterations: The impact of constructing transit facilities before constructing general purpose lanes should be considered.	WSDOT is partnering with PSCAA in early adoption of ultra low sulfur diesel. Biodiesel is a viable alternative to ultra low sulfur diesel and has been included as potential mitigation. The use of alternative vehicle types for transit vehicles would be a decision of the service provider, considering all factors, such as cost, reliability, energy consumption, and air quality. Sequencing of individual projects would consider many factors, including the possibility of reducing the construction phase impacts of one project by constructing other projects before it. Additional potential mitigation measures have been added to Section 3.1.5.1 in the Final EIS.

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				Need for Additional mitigation discussion As mentioned in the letter there is not enough quantitative distinction between the alternatives, particularly during the construction period. There needs to be additional quantification of the impacts of the individual elements of the alternatives in the following areas: the footprint of the different elements, e.g., transit stations, the length and amount of tunnels, overpasses and elevated roadway sections, and how the aggregate used in construction will be transported. Additional discussion of the impact of construction on driving behavior would be helpful in the following areas: construction activity and travel speed, changes in lane width in construction areas and travel speed, increased braking and acceleration in construction areas, and impacts of increased truck activity on driving behavior and travel speed. Even a qualitative or comparative evaluation of these impacts would insist decision makers. The current I-5 projects in Tacoma could provide one source of information.	See the response to comment L55.AQ-3 above.
L55	AQ	8	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	p. S-18, Figure S2B: Please clarify the relationship between the Construction Energy Consumption table, and Table 3.3-1 on p. 3.3-3, and the project alternatives costs and the particulate emissions construction impacts discussed on pp. 3.1-7 to 3.1-12. The project alternative costs and the construction energy consumed indicate alternatives with very different construction impacts while the narrative in the air quality section describes the construction impacts as being essentially the same for all of the alternatives. Of particular concern would be all types of emissions from construction vehicles and equipment.	Construction energy consumption has been estimated at a very gross level using the general type of project (freeway or transit facility) and preliminary cost estimate for the various alternatives, an approach developed by the California Department of Transportation in the early 1980s. A more exacting approach in not possible at this point given the lack of detail in definition of exact project elements and phasing. At this program level of analysis, the location, nature, and duration of construction activities has not been defined; therefore, it is not possible to quantify amount, duration, and location of construction-phase air pollutant emissions. Because of the gross nature of the energy analysis, and because it includes both vehicle energy and the energy required to construct materials such as asphalt, it does not directly correlate with air pollutant emissions; therefore, a similar analysis has not been completed for construction-phase air pollutant emissions. The Final EIS includes an expanded qualitative comparison of construction-phase pollutant emissions for each of the alternatives.

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L55	AQ	9	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	p. 3.1-11, Section3.1.5 Construction: Identify which mitigating measures are standard for all land transportation construction projects and which are specific to this project. Also include the mitigating measures identified in Attachment A in this list.	Additional potential mitigation measures have been added to the Final EIS in Section 3.1.5.1. All mitigation measures will be evaluated on a project-by-project basis to determine their applicability to the individual project.
L55	AQ	10	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	p. 3.4-3, Section3.4.4 Geologic and Soil Resources: Add a discussion of approximately how many trucks and trips would be required to haul the estimated quantities of aggregate to the construction site. Then add a discussion in the Air Quality section on the impacts from these truck trips.	At this stage, exact project elements and phasing have not been defined; therefore, it is not possible to determine the number, length, timing, or location of truck trips associated with the elements of the alternatives. Once a preferred alternative has been advanced and the project elements are evaluated in detail, this information will be available.
L55	TR	1	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	p. 3.12-28, Section 3.12.4.3 Alternative 2: Construction Impacts, First paragraph includes the following statement, "Although efforts would be made to maintain the existing number of lanes during construction, most traffic control measures would result in a decrease in capacity and an increase in system-wide roadway congestion." The air quality implications of this statement should be discussed in the air quality section for all of the alternatives with additional discussion of the differences in impacts between the alternatives because of the differences in the facilities being constructed.	Additional documentation of construction-related traffic and air quality impacts is provided in the Final EIS, Sections 3.1 and 3.12. However, traffic and air quality effects for the 2007 time frame were not modeled, so the findings are based upon a qualitative assessment.
L55	TR	2	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	p. 3.12-40, Section 3.12.5.1 Construction: Identify which mitigating measures are current practice and which are additional mitigation specifically proposed for I-405.	Many of these mitigation measures will need to be defined at the project level. The Final EIS provides some additional clarification of current practices and corridor-specific strategies in Section 3.12.5.1 of the Final EIS.

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L55	CU	1	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	p. 3.12-47, Section 3.23.4.1 Cumulative Effects of Critical Resources Air Quality Regional Air Pollution Trends: While the environmental agencies have been able to attain the National Ambient Air Quality Standards for the criteria pollutants of particulate matter, carbon monoxide and ozone there remain air quality and public health concerns that need to be addressed. The region is at risk for violating the national standards for ozone and particulate matter during the next 5 to 10 years. There are additional public health concerns from fine particulate emissions and toxic air pollutants. The Central Puget Sound Region has some of the highest levels of toxic air pollutants, such as benzene, in the country. Fine particles, 2.5 microns in diameter or less, can lodge in the lungs and cause health problems and also contain toxics. Gasoline and diesel engines in vehicles and equipment are major sources of both of these emissions.	This concern regarding regional emissions of pollutants is recognized in the EIS. It is addressed separately for each pollutant of concern. Transportation sources and regional issues regarding hazardous air pollutants, including benzene, are discussed in Section 3.1.1.6 of the EIS. The emissions and health effects of particulate matter are discussed in the previous section. Emissions of ozone precursors are modeled in detail and the results are presented in Table 3.1-3.
L55	CU	2	Dennis McLerran 110 Union St, Ste 500 Seattle, WA 98101 Agency: Clean Air Agency	p. 3.23.50 & 51, Section 3.23.4.1 Cumulative Effects on Critical Resources, Air Quality, Cumulative Effects of I-405 Corridor Program Alternatives: There needs to be additional discussion of the impacts on particulate matter and ozone. The discussion should include impacts in 2010 as well as 2020.	The results in Table 3.23-11 in the DEIS are indicative of the trend in transportation emissions between the alternatives. Table 3.23-15 in the FEIS specifically reports ozone precursor emissions for 2020. While regional particulate emissions were not developed because the project study area is not within any particulate matter non-attainment or maintenance areas, transportation particulate emissions for the region can be expected to differ between the alternatives in a fashion similar to the other pollutants. The air quality analysis developed for the EIS was completed prior to the adoption of *Destination 2030,* PSRC's new metropolitan transportation plan. The conformity analysis procedures used for *Destination 2030* are substantially updated and changed from those in prior plan conformity analysis to reflect changes to federal law. The actual regional emissions for all of the alternatives are now expected to be more similar to the values appearing in PSRC's *Destination 2030* analysis. The EIS analysis used PSRC's prior procedures; therefore, the emission values developed by PSRC for *Destination 2030* (Table 3.23-14 in the FEIS) and those developed for this EIS may not be directly compared. However, the trends continue to be valid. As a result, the emission of CO is expected to be higher in both 2010 and 2030

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					than in 2020 for any one of the alternatives. Because emissions would be less under any one of the alternatives than under the No Action Alternative, which is similar to the *Destination 2030* plan within the study corridor, actual emissions in both 2010 and 2030 for any of the action alternatives are expected to be lower than the values for the *Destination 2030* plan in a ratio similar to the results in Table 3.23-15.
L56	O	1	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	Attached you will find the Washington State Department of Ecology's comments on the "I-405 Corridor Program Draft Environmental Impact Statement." We acknowledge the amount of work involved to produce the document and appreciate your efforts in providing information to assist in the evaluation of the DEIS.	Thank you for your comment.
L56	SCH	1	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	One concern that we would like to relay is with the schedule for choosing a preferred alternative. The Steering Committee will select a preferred alternative on November 8, 2001. That date is too early to allow for an adequate review of all the comments received on the DEIS. We suggest that you allow more time between the comment period on the DEIS and selecting a preferred alternative to ensure that a full analysis is performed.	A majority of the comments received by the October 24, 2001, cutoff were made available to the Steering, Citizen, and Executive Committee members on October 30, 2001. Efforts were made to respond to specific requests for added information and WSDOT staff has provided special briefings. In response to concerns, WSDOT moved Concurrence Point #3 prior to publishing the Final EIS after responses and additional information on the Preferred Alternative were documented.
L56	O	2	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	Some of Ecology's comments relate to Total Maximum Daily Loads (TMDLs) and how that topic will be addressed in context of the Corridor Project (see pg. 3). Ecology would like to work with WSDOT to address the listings in the I-405 corridor. Currently, significant partnerships with the US Forest Service, the US Navy, and several local governments, including King County, have been formed to work on TMDL development. We would like to discuss similar opportunities with WSDOT as soon as poossible as we are currently scheduling our TMDL priorities for the next ten years. Please contact me at your earliest convenience to discuss this matter.	The WSDOT Environmental Affairs Office (EAO) is the lead for discussing statewide TMDL development with Ecology. This comment has been forwarded to the WSDOT EAO Watershed Program Manager. At this time, WSDOT is committed to initial discussions with Ecology regarding TMDL development in Washington State, including the I-405 Corridor. WSDOT cannot, however, make commitments to fund work on TMDL development at this time. WSDOT has requested that Therese Swanson, Washington State Department of Ecology, contact the WSDOT Watershed Program Manager at EAO to discuss Ecology's request for working with WSDOT to address TMDL listings in the I-405 Corridor.

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L56	O	3	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	As an "agency with jurisdiction" and an "agency with expertise" under the State Environmental Policy Act (SEPA), we offer the following comments relating to the adequacy of the Draft Environmental Impact Statement (DEIS) for the I-405 Corridor Project: The overriding aim of the State Environmental Policy Act (SEPA) is to provide full disclosure of the proposed alternatives' significant impacts with information sufficient to enable decision-makers to make a reasoned choice between alternatives. In that light, Ecology is concerned with the adequacy of information provided on the alternatives presented in the DEIS. Overall, the alternatives are not presented in a manner that makes it easy to compare and contrast the environmental impacts of each alternative's components. The impacts and mitigation analyses are limited, thus making it difficult to reach a conclusion among alternatives in selecting a preferred alternative for the Final Environmental Impact Statement (FEIS). This should be addressed in the FEIS and prior to the final decision on the preferred alternative. Another important aim of SEPA is for alternatives to be developed that both feasibly attain the proposal's objectives while exploring opportunities for reduced environmental cost. It may be appropriate to adjust or recombine alternatives to meet this objective. Many of our comments are based on SEPA's basic premises and are offered to improve the FEIS to ensure environmental issues are appropriately considered in decision-making.	The decision to be made through the I-405 Corridor Program is to determine the best mix of modal solutions, transportation investments, and demand management to improve movement of people and goods throughout the I-405 corridor, reduce foreseeable traffic congestion, and satisfy the overall purpose and need. Please refer to page S-1 of the I-405 Corridor Program Draft EIS. Because of the systemic nature of the alternatives, it is not reasonable or practical to isolate the specific contribution of each component or major element across the range of performance measures and impact measures presented in the Draft EIS. To help ensure that the Preferred Alternative is an effective and responsible choice, the request for concurrence on the Preferred Alternative and mitigation concept by agencies with jurisdiction as part of the "Reinventing NEPA" process was delayed approximately four months until evaluation of the effects of the Preferred Alternative was complete and the corridor mitigation program was complete. In addition, follow-on NEPA and SEPA environmental analysis, documentation, and review will be prepared to enable decisions regarding site-specific, project-level details on alignments, high-capacity transit technology, project impacts, and mitigation measures. Also, please refer to the response to comment L54.O-7.

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L56	PN	1	Therese Swanson Department of Ecology PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	Section 3.24 Irreversible and Irretrievable Commitments of Resources acknowledges that "implementing any of the alternatives would require a commitment of natural, human, and fiscal resources, and that "irreversible and irretrievable commitments of resources would occur" under all the scenarios. The section discusses the various "commitments" and concludes by stating that the proposed commitments are based on the Purpose and Need for the 1-405 Corridor Program which recognizes that "businesses, employees, and residents in the I-405 corridor and region would benefit substantially from additional transportation choices and improved mobility in the I-405 corridor." The benefits include accessibility, reliability and safety, travel time and fuel savings, as well as improved air quality and protection or enhancement of fish-bearing streams. The section concludes with "These benefits are anticipated to outweigh the commitment of resources to construct and operate transportation improvements." It is not apparent from the information provided that the above highlighted statement can be said about each alternative. Furthermore, it is difficult to determine that all the alternatives meet the Purpose Statement in the DEIS. The purpose of the proposed action is: To provide an efficient, integrated, and multi-modal system of transportation solutions within the corridor that meets the need in a manner that: · Provides for maintenance or enhancement of livability for communities within the corridor; · Provides for maintenance or improvement of air quality; protection or enhancement of fish-bearing streams, and regional environmental values such as continued integrity of the natural environment; · Supports a vigorous state economy by responding to existing and future travel needs; and · Accommodates planned regional growth.	It is acknowledged that reasonable parties may weigh benefits and commitments differently, and may reach different conclusions based on the same data when considering such a broad range of factors. Nonetheless, this conclusion is believed to be accurate. This is especially true with regard to the Preferred Alternative and mitigation program. To help address your comments, WSDOT has prepared and proposes to implement an early-action environmental impact mitigation decision-making process.

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				As a member of the Steering Committee, Ecology participated in the formulation of the Purpose statement and recognizes the importance of all of its objectives. However, our role in ensuring that the Purpose is carried out primarily is through implementation of the Clean Water and Clean Air Acts. With that said, the information presented in the DEIS does not clearly lead us to the conclusion that air quality will be maintained or improved and that fish-bearing steams will be protected or enhanced through implementation of all the alternatives. In the same vein, we find that the information provided regarding mitigation is incomplete and imbalanced when comparing the various alternatives. Specifically, the mitigation costs, feasibility, and needs are not fully disclosed; making it difficult to ascertain that a particular alternative will meet the stated Purpose of the Corridor Project.	
L56	WR	1	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	The DEIS and the supporting "Surface Water Resources" technical report make some erroneous assumptions regarding options available for managing stormwater discharges, thus resulting in miscalculations in stormwater controls necessary for each alternative. The costs for Alternatives 2 – 4 appear disproportionately underestimated. These costs can be significant, and we are concerned about using the cost information provided as criteria for selecting a preferred alternative.	The costs for the various alternatives were estimated in year 2000 dollars based on most recent history from state and local agencies. Recent historical costs for environmental mitigation, including stormwater detention and treatment facilities, were included in these costs. However, no attempt was made to differentiate or break out specific mitigation costs for stormwater. In addition, contingencies were added to reflect the potential for more stringent mitigation requirements in the future.
L56	WR	2	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	7. State law requires the use of "all known, available and reasonable" treatment methods regardless of the quality of the receiving waters. This is a technology-based requirement. State and federal law also require the use of more stringent treatment methods as necessary to prevent a violation of the state's water quality standards, regardless of cost. The document, "State of Washington Alternative Mitigation Policy Guidance for Aquatic Permitting Requirements from the Departments of Ecology and Fish and Wildlife" (an appendix to the Surface Water Resources Report), establishes the limits within which alternative mitigation approaches can be applied to stormwater discharges and still be in compliance with these state and federal water pollution control statutes. Statements within the DEIS are inconsistent with that document. For the record:	The intent of the I-405 Corridor Program is to treat all project-related stormwater runoff. Creating or exacerbating water quality violations would not be acceptable. However, basin- or Water Resource Inventory Area (WRIA)-level mitigation may be appropriate for impacts affecting base flow or stream function. Refer to response to comment L56.WR-21.

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				· Alternative mitigation for stormwater discharges must be in-kind and within the same receiving waterbody. The DEIS repeatedly gives the impression that other alternatives are possible. · The Department of Ecology must decide whether treatment BMP's are available and reasonable on a project site. WSDOT does not have the authority to make that decision on behalf of the state. WSDOT is responsible for providing an adequate engineering and cost analysis from which the decision will be made. · It is not an option to forego stormwater treatment measures if water quality standards will not be met or if water quality violations are being aggravated by the project. Nor is it acceptable to create "hotspots" and not meet water quality standards in one place in exchange for providing mitigation in another.	
L56	WR	3	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	2. The DEIS indicates that five waterbodies along the project route are on the 303(d) list for metals, and that six waterbodies are on that list for temperature. Stormwater from the existing and projected WSDOT discharges include the listed metals and will impact the temperature of those streams. WSDOT has assumed that application of BMPs from an updated Highway Runoff Manual will be adequate in these situations. This is unlikely. Ecology cannot permit new or increased discharges of the pollutants of concern into these waterbodies until a TMDL for those pollutants has been completed, or until WSDOT performs a receiving water study to determine if dilution is available, or advanced mitigation is provided that assures assimilative capacity. Alternatively, the discharges can be allowed if they meet water quality standards at the point of discharge. This must be demonstrated and cannot be assumed to be the case through the application of "enhanced treatment" BMP's. Ultimately, until Ecology performs a TMDL for that water body, there is no guarantee that WSDOT will not have to retrofit either the new or existing facilities to meet their allocation for the relevant pollutant. No TMDLs have been completed or approved for these listings. A TMDL technical analysis addressing fecal coliform bacteria has been completed for North Creek. The summary implementation strategy (including concerns about peak flows) is being developed at this time and is scheduled for submittal to EPA in approximately one year.	In addition to meeting the treatment requirements of the Washington State Department of Ecology's Stormwater Management Manual for Western Washington or functionally equivalent guidance, individual road projects will meet any total maximum daily load (TMDL) discharge limitations in effect at the time of a particular project. Presently, the only TMDL limitations in the study area relate to ammonia in the Green River.

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L56	WR	4	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	3. For waterbodies that are not on the 303(d) list, WSDOT should assume that "enhanced treatment" is necessary. This does not appear to be the assumption. In more than one instance the text states that "water quality data indicate degraded conditions in the receiving waters, enhanced stormwater treatment would be considered." The 2001 Ecology manual requires enhanced treatment as a default unless there is sufficient water quality information to conclude that it is not necessary. The WSDOT statement quoted above seems to indicate that it will not consider enhanced treatment unless there is sufficient water quality data to indicate that it is necessary. This is not an acceptable assumption. This issue may also be resolved if WSDOT chooses to perform the water quality analyses described in the comment immediately above.	The intent of the I-405 Corridor Program is to meet the treatment requirements of the Washington State Department of Ecology's Stormwater Management Manual for Western Washington or functionally equivalent guidance. The sentence referred to in the fourth paragraph of Section 3.5.5.1 has been removed.
L56	WR	5	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	4. The assumption is made that watershed-wide mitigation approaches to hydrologic impacts – including impacts to stream base flows - are possible and will be more cost-effective. While there may be opportunities for such approaches, to assume that they will be available and acceptable for offsetting project impacts is questionable. Offsetting baseflow impacts will likely mean taking actions within the same basin (e.g., May Creek) if not the same sub-basin. The discussions on impacts to base flow and water quality are based upon looking at the total impervious surfaces and pollutant loading added to the basin of a class 1 or 2 stream (King Co. classification system). That gross level view misses significant impacts that can occur on a more localized basis to smaller streams, side channels or tributaries within each basin. Those sub-drainages can be critical habitat to salmonids and other biologic resources. Impacts should be analyzed on a gross-level view and a local level. Because the road expansion locations and these smaller drainages are mapped, it shouldn't be difficult to identify those drainages at increased risk of habitat loss due to the project. As the project planning and design progresses, there should be a more detailed examination of base flow impacts within basins due to impervious surfaces, road cut disruption of interflow routes, and compaction of pervious areas.	Stream basin and Water Resource Inventory Area (WRIA)-level mitigation are two of a number of mitigation approaches that will be used during the implementation of the I-405 Corridor Program. Individual project impacts will be identified and fully mitigated during the environmental documentation conducted for the individual projects.

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L56	WR	6	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	5. The text indicates that Water Quantity Controls will not be required for certain waterbodies. WSDOT has assumed no flow control for discharges to those waterbodies on WSDOT's current list of waterbodies not needing flow control. That is currently an incorrect assumption. The updated Ecology manual only includes an exemption for discharges to Lakes Sammamish and Washington. Direct discharges to the Cedar, Sammamish, and Green/Duwamish rivers will require flow control unless an application is made by a local government to exempt those rivers. Such an application must include a hydrologic justification.	Lois Kulzer, a staff person from King County Department of Natural Resources familiar with the 1992 King County Stormwater Manual, was contacted. She stated that the County would be submitting analyses to the Washington State Department of Ecology demonstrating the adequacy of the County's requirement of no stormwater detention for direct river discharge. Ms. Kulzer stated that the analyses would probably be submitted within one year and would likely define an upstream limit on each river, above which detention would be required.
L56	WR	7	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	6. As a measure to prevent groundwater pollution, the mitigation measure offered is to collect runoff from impervious surfaces, test the quality, and if groundwater standards are exceeded, treat the runoff prior to discharge. This approach is not implementable on a timely basis and conflicts with the 2001 Ecology stormwater manual. It is not supportable to delay the decision regarding whether to apply treatment until after the project is built and stormwater-monitoring results are reviewed. The Ecology manual allows discharge to the ground without substantial treatment if certain soil quality and depth to groundwater criteria are met. If those are not met, a minimum of basic treatment is necessary prior to discharge to the ground. The assumption that basic treatment is adequate to protect groundwater is a default standard that may not provide adequate protection in all cases but should at least be the base assumption for estimating costs.	Section 3.5.5.2 has been revised to be consistent with the Washington State Department of Ecology's Stormwater Management Manual for Western Washington or functionally equivalent guidance.

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L56	WR	8	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	In discussions regarding applicable permits and needed regulatory actions, the DEIS does not acknowledge that all of the I-405 stormwater discharges will be covered under a municipal stormwater permit(s) issued to WSDOT by Ecology. These permits will include requirements that the discharges must comply with. Those requirements will be established when the permits are issued – in 2002 for the USEPA-designated Phase I areas, and in 2003 for the USEPA-designated Phase II areas. Those requirements will likely include: · Runoff from new and replaced impervious surfaces must at least comply with the 2001 manual; · All stormwater treatment and detention facilities must be operated and maintained in compliance with a schedule that is equivalent to that in the 2001 manual. This will require a commitment of significant resources to ongoing operation and maintenance. · WSDOT must make progress in retrofitting stormwater controls onto existing stormwater discharges.	A discussion of National Pollutant Discharge Elimination System (NPDES) requirements related to stormwater management has been added to the end of Section 3.5.3.1.
L56	WR	9	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	The estimated pollutant loadings are inconsistent in these documents. Appendix D does not present the same estimates as summarized in Chapter 5 of the report, which, in turn, are not the same as those reported in Figure 5.2. Part of the confusion may be the point of reference. Some of the data (Appendix D) appears to represent total loadings to the environment. Some data (Figure 5.2) is reported as increases over the baseline – which is not defined. And some data is reported in relation to increases over the No Action alternative (text of Chapter 5). This lends to a confusing presentation making it difficult to understand the differences in pollutant loadings among the alternatives.	An outdated and incorrect version of the pollutant loading table was inadvertently published in Appendix D of the I-405 Corridor Program Draft Surface Water Resources Expertise Report. An addendum containing the correct spreadsheet has been issued to the expertise report.
L56	AQ	1	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	The long-term, construction impacts on air quality and public health cause concern. Heavy-duty, diesel-powered, construction equipment generates significant amounts of diesel particulate matter (PM). Increased congestion during construction periods can increase the ambient concentrations of benzene, formaldehyde, and 1-3 butadiene from gasoline-powered motor vehicles. The EPA has identified benzene, formaldehyde, and 1-3 butadiene as human carcinogens and California Air Resources Board has identified diesel particulate matter as a probable human carcinogen. This combination of an increase in emissions due to an increase in both construction activity and an increase in congestion due to construction activity can create toxic hot-spots in severely congested areas.	Health effects of toxic air pollutants are acknowledged in the EIS. Neither the Department of Ecology or USEPA has provided direction or guidance or procedure for the evaluation of toxic air pollution from transportation sources; therefore, the EIS has discussed the nature of the pollutants and provided qualitative comparison between the alternatives. Construction phase emissions have not been quantified because of their temporary nature and because exact project elements and phasing have not yet been defined for each of the general alternatives. Also see response to comment L55.AQ-3.

Code Number			Name	Comment	Response
L56	AQ	2	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	The current impact analysis does not provide adequate detail to properly evaluate how construction emissions will vary with the proposed alternatives, nor does the analysis compare how variations in construction activity impact total emissions from mobile sources for the proposed alternatives. We encourage WSDOT to provide information regarding quantifying emissions from individual sources that will enable decision-makers to select an alternative that best protects public health.	At this stage, exact project elements and phasing have not been defined; therefore, it is not possible to determine timing and quantities of particulate emissions in greater detail. The EIS compares the alternatives by the relative magnitude of construction air quality impacts. Once a preferred alternative has been advanced and specific projects and design elements are evaluated in detail, construction impacts and appropriate construction mitigation will be identified for each of the element projects.
L56	WET	1	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	Ecology has concerns with the acreage of wetland areas and the number of high priority wetlands proposed for impacts, especially for alternatives 2, 3 and 4. Ecology is charged with protecting wetland resources, which are waters of the state, under Section 401 of the Clean Water Act, RCW 90.48.080 and chapter 173-201A-060 through 173-201A-070 WAC. The latter, antidegradation policy, states, "existing beneficial uses shall be maintained and protected and no further degradation which would interfere with or become injurious to existing beneficial uses shall be allowed." Chapter 173-201A-060(10) WAC states, "(a) In addition to designated uses, wetlands may have existing beneficial uses that are to be protected that include ground water exchange, shoreline stabilization, and storm water attenuation. (b) Water quality in wetlands is maintained and protected by maintaining the hydrologic conditions, hydrophytic vegetation, and substrate characteristics necessary to support existing and designated uses." In order to protect the beneficial uses and functions of wetlands, Ecology requires that applicants demonstrate that they have followed the mitigation sequence in developing their project, as discussed in our guidance (see How Ecology Regulates Wetlands, Publication #97-112); the project impacts to wetlands should first be avoided, then minimized, and finally, compensated by replacing or providing substitute resources. Due to the difficulty in successfully replacing wetlands via compensatory mitigation, Ecology places emphasis on avoidance and minimization of impacts. By demonstrating that a project has gone through the mitigation sequence, Ecology has reasonable assurance that the total adverse impacts of a project have been reduced to an acceptable level, one that maintains wetland beneficial uses and functions.	The EIS identifies wetland impacts using a reasonable worst-case scenario. The actual amount of wetland impacts will likely be less than the amounts identified. It is likely that through project design many of the wetlands can be avoided or their impacts reduced. The mitigation approach will be to first avoid, then minimize, then compensate for impacts to wetland area and function as described in Section 3.6.5.1. The stated mitigation sequencing is applied on all co-lead agencies' projects. This sequencing approach is stated in Section 3.6.5.1 of the EIS. The co-lead agencies agree with your statement. The analysis in the EIS uses a reasonable worst-case scenario to identify wetland impacts. Avoidance of many of these impacts will likely be achieved through the design process. Impact avoidance is the preferred approach on all WSDOT projects. This approach is stated in Section 3.6.5.1 of the Draft EIS.

Code Number			Name	Comment	Response
				From the information provided in the DEIS, although preliminary in nature, it appears that the no action alternative, followed by alternative 1, have the fewest acres of wetland impacts, as well as the lowest number of impacts to high priority wetlands. Ecology notes in the DEIS that wetland impacts may be avoided by realigning HOV arterials and/or elevating the HCT. We strongly support the applicant pursuing all avoidance and minimization strategies during project-level design, and during alternative analysis.	
L56	TR	7	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	1. Page S-8: The alternatives do not have the same results. There is not a valid comparison of mass transit versus increased SOV capacity.	We are not sure what this comment means. There is no mention of result comparisons on page S-8.
L56	O	4	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	2. The unresolved issues list is substantial. Many of these issues must be resolved before an informed decision can be made. We recommend that WSDOT consider providing another opportunity for public comment before a final decision is made if new information about significant adverse impacts is developed.	If new information is developed on probable significant adverse impacts, another opportunity for public comment would be provided.
L56	O	5	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	3. Page S-15: The Secondary impacts should include growth enabled or caused by these projects. This should include locations, timing, and secondary impacts of growth such as loss of habitat, increased impervious surface affecting water quality, quantity and aquatic resources, increased burden on the infrastructure and air quality emissions affecting human health. This information may be provided in local planning documents, but if it has not, WSDOT has a responsibility under SEPA to analyze it in this DEIS as part of the indirect impacts.	Please refer to the response to comment L51.O-5.

Code Number			Name	Comment	Response
L56	WR	10	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	4. Page S-18: should include a graph of the impacts to water quality by each alternative if no mitigation took place.	A graph showing suspended solids loadings by alternative has been added to the set of impact graphs (Figure S2-A) in the I-405 Corridor Program Final EIS Summary and in the I-405 Corridor Program Errata and Addenda to Expertise Reports.
L56	WR	11	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	5. Page S-30: Adding impervious surface is an impact.	Section 3.5 of Table S-2 identifies the number of acres of new impervious area for each alternative.
L56	WR	12	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	6. Table S-2, Section 3.5, No Action Alternative, Summary of Mitigation: One of the possible mitigation measures cited for construction site runoff is the use of coagulants in sediment ponds. Such an action is possible, but it would require review and approval from the Dept. of Ecology. WSDOT should expect Ecology to be concerned about the potential for impacts of the coagulant in the receiving environment. Batch mode addition of coagulants has been approved by Ecology. Because this mitigation measure is being considered for construction sites under all alternatives, this comment applies regardless of the alternative chosen.	Best management practice (BMP) C250 of Volume II of the Washington State Department of Ecology's Stormwater Management Manual for Western Washington describes the conditions under which chemical treatment of construction runoff water will be operated. The I-405 Corridor Program will comply with these conditions or functionally equivalent guidance.
L56	WR	13	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	7. Table S-2, Section 3.5, No Action Alternative, Summary of Mitigation: One of the possible mitigation measures during construction to decrease the potential for groundwater contamination is restrictions on where vehicles may refuel. WSDOT should be aware that it would be expected to comply with the "BMPs for Mobile Fueling of Vehicles and Heavy Equipment" in Volume IV of the 2001 manual. Any activities at construction sites or on the newly constructed road system must comply with applicable BMP's from Volume IV of the 2001 manual.	The groundwater quality mitigation for vehicle refueling has been reworded as suggested.

Code Number			Name	Comment	Response
L56	GS	1	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	1. Page 3.4-19: All of these projects would fall under the construction stormwater permit. Any WSDOT projects would fall under their municipal stormwater permit. Yet the requirements of these permits are not included.	Text has been added to 3.5.3.1 summarizing both the construction stormwater permit and the WSDOT NPDES Permit.
L56	GS	2	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	2. Page 3.4-24: Define "most current requirements". Typically WSDOT uses requirements as of time of preliminary design. Has that been completed yet?	Section 3.4, Soils and Geology, of the I-405 Corridor Program DEIS, only has 20 pages. Your comment may apply to some other section; however, current requirements mean the requirements in place at the time of the permit application. Preliminary design work required for permitting has not been completed yet.
L56	WR	14	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	1. Subsection 3.5.1.1 Plans and Policies: Because the text references state water quality standards, this listing of codes that were used in the "analysis of impacts and the determination of mitigation for surface water" should include Chapter 173-201A WAC – Water Quality Standards for Surface Waters of Washington State.	The reference to Washington Administrative Code, Chapter 173-201A, Water Quality Standards for Surface Waters of Washington State, has been added in Section 3.5.1.1.
L56	WR	15	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	2. Subsection 3.5.2.1: The text states that long-term annual pollutant loading was estimated using methods described in WSDOT Highway Water Quality Manual (WSDOT, 1988). No further description is given in the EIS or the Surface Water Resources Report. Therefore, we cannot provide comments on the appropriateness of the method. The method should be provided within the document. Unless it is incorporated into the method, the text should also provide the stormwater quality assumptions that are used.	The factors used in the pollutant loading methodology are discussed in Section 3.1 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report. For a full description of the methods, the commentor is referred to the Washington State Department of Transportation (WSDOT) 1988 Highway Water Quality Manual, referenced in the text, which is readily available.

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L56	WR	16	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	3. Page 3.5-11. A hydrologist that can be clearer about the hydrologic impacts of this proposal should rewrite the last paragraph on the page, in particular the hydrologic processes being impacted such as evapotranspiration.	The second paragraph in Section 3.5.4 has been revised.
L56	WR	17	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	4. Page 3.5-20. 40-60% reduction through treatment of metals may be adequate if the metals in the discharge are not soluble. However, monitoring of other highway discharges, including WSDOT highways, indicates that soluble metals are substantially present in highway discharges. These are not significantly reduced by standard treatment BMPs.	This paragraph has been reworded to indicate that the pollutant load analysis, which assumes no stormwater treatment of the highway runoff, probably over-estimates the actual pollutant loads generated along I-405. This is due to the treatment provided by the existing stormwater treatment facilities. This statement has also been moved to Section 3.5.2.1.
L56	WR	18	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	5. Page 3.5-24. The document states that regional treatment and detention of stormwater will be explored with adjacent municipalities early in the design process. If WSDOT wishes to be successful in advanced watershed-based mitigation these explorations need to be considered during the conceptualization of the project, not during the design. Otherwise, the potential effectiveness of this mitigation strategy may be very low.	Regional stormwater treatment can be effectively applied at both the concept and the design stage of a project. Opportunities for regional stormwater treatment facilities will be explored as part of the Early Action Mitigation Program for the I-405 Corridor Program.
L56	WR	19	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	6. Page 3.5-24. In this and other places within the DEIS, WSDOT indicates that applying stormwater controls to existing stormwater discharges (a.k.a., "retrofitting") may occur in addition to managing stormwater from the new impervious surfaces if it is "practical." However, there is no commitment to do so. Since there is no commitment to do so, and since WSDOT's criteria for whether such an action is practical are unlikely to be met, it is inappropriate to use this as a possible environmental benefit of alternatives that expand highway surfaces. In addition, WSDOT is already required by the Puget Sound Highway Runoff Rule, and by its NPDES municipal stormwater permit, to retrofit its existing discharges. So to claim retrofitting as a compensatory mitigation measure for this project is inappropriate. Generally credits in environmental credit trading are only generated when the technology-based and water quality-based requirements are exceeded.	A number of the alternatives would require major reconstruction along I-405. This would warrant serious consideration for full or partial stormwater retrofit of existing highway lanes at the time that the individual projects move forward. The opportunity for retrofit has been identified. However, there have been no assumptions made in the programmatic EIS regarding the extent of retrofit that will occur. To the extent that the arterial and highway projects contemplated under the I-405 Corridor Program accelerate the retrofit of existing roads, a water quality benefit would accrue to the region.

Code Number			Name	Comment	Response
L56	WR	20	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	7. Although the document repeatedly identifies that construction will be stopped and bare soil areas stabilized when there is more than a half inch of precipitation in 24 hours, the reality is that if there is likely to be a discharge that is untreated, as a result of any storm frequency, that discharge will be unacceptable.	Construction best management practices (BMPs) will be applied to all road projects. No erosion and sediment control measures will work perfectly, and some sediment may escape construction sites, especially following larger storm events. However, active inspection and maintenance of erosion control measures would minimize these episodes. As stated in Section 3.3.3, Mitigation, special requirements and limitations would be imposed on construction carried out during the wet season or in the vicinity of streams and lakes.
L56	WR	21	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	8. Page 3.5-25 last Paragraph: If a WRIA-wide mitigation is proposed, it needs to be defined in order to make informed decisions. A WRIA-wide mitigation does not remove Clean Water Act requirements for local impacts.	A process for interagency review and approval of an early action mitigation program for the I-405 Corridor Program is being developed.
L56	FATE	1	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	1. Based on recent discussion with DOT and the Stormwater study, off-site/out-of-kind mitigation is no longer discussed, but has changed to discussion of advanced watershed-based mitigation. This language needs to be changed in the EIS to reflect the new understandings. Advanced watershed-based mitigation has the most potential to be appropriate and successful if the pollutant being discussed is a far-field pollutant.	The language in the EIS has been changed as appropriate.
L56	CU	1	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	1. Page 3.23-4: The HCT transit included in the Destination 2030 is not included in Alternatives 3 and 4. Thus these alternatives appear inconsistent with regional planning. However, the document assumes that there will not be any induced growth because this project is consistent with local and regional planning. This is an inconsistency that should be corrected.	The I-405 Corridor Program Draft EIS identifies 2020 as its horizon planning year. *Destination 2030* assumes that regional HCT would be implemented after the I-405 Corridor Program horizon. The I-405 Corridor Program is compatible with implementation of HCT after 2020; thus there is no inconsistency with regional planning under *Destination 2030*. Please refer to response to comment E66.SOL-1 for further information on induced growth.

Code Number			Name	Comment	Response
L56	CU	2	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	2. Page 3.23-12 first paragraph: Again, not all alternatives are consistent with regional plans. Also, unless land use patterns are revised to reduce dependence upon the automobile, the transportation demand management program will be ultimately unsuccessful.	See responses to comments L40.LU-1 and L40.LU-2 .
L56	CU	3	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	3. Page 3.23-59 "Alternative 3 would contribute to substantially greater cumulative effects within the study area." This is true. However, no additional mitigation is proposed. If the impacts are correctly analyzed and mitigation included, the cost of this alternative would be much higher.	An estimate for a substantial program to mitigate the impacts attributable to the I-405 Corridor Program is already included in the projected cost for Alternative 3. Also, please refer to the response to comment L52.SOL-11.
L56	CU	4	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	4. Page 3.23-70: Without allowing for secondary effects or appropriate mitigation, the conclusions are not supported.	As is typically the case, the discussion of cumulative effects addresses potential impacts prior to mitigation. Also, please see the response to your comments L56.PN-1 and L56.CU-3, as well as the response to comment L51.O-5.
L56	CU	5	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	5. Page 3.25 –1,2: Without secondary effects, this is incomplete.	Please refer to the responses to comments L-54.CU-6 and L51.O-5.

Code Number			Name	Comment	Response
L56	CU	6	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	6. Page 3.23-57. The text indicates that there are no requirements for retrofitting and therefore it is unlikely to occur. Once a TMDL has occurred within a water body that is listed, retrofitting is likely to be required or other ways found to create assimilative capacity so that water quality standards are met and the waste load allocation for different dischargers are met.	The paragraph in question discusses primarily hydrologic (flow) conditions, which are not directly influenced by total maximum daily loads (TMDLs).
L56	CU	7	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	7. Page 3.23-59: the cumulative analysis is that even with the no action alternative the effect upon water resources is judged to be substantial and adverse. Based on this, it would seem that DOT needs to evaluate how its piece of the problem, not just the proposed alternatives, but also the effects of existing DOT facilities need to be evaluated for retrofitting on those water bodies that are listed at a minimum. Either through receiving water studies coupled with watershed-based mitigation showing there is dilution available to the discharges or work with Ecology on TMDLs that would clearly define DOT's allocation.	One basin study has been recommended for Springbrook Creek, due to its relatively poor water quality and due to the relatively high impact that the I-405 Corridor Program would have upon this basin. Special studies on other basins may be identified as environmental documentation occurs for individual projects. As a National Pollutant Discharge Elimination System (NPDES) permit holder, Washington State Department of Transportation (WSDOT) will participate in any future total maximum daily load (TMDL) studies, which may be conducted on individual streams within the study area. Contact was made with Vashika Smith, Ecology Coordinator for Water Resource Inventory Areas (WRIAs) 8 and 9 (Cedar and Green River Basins) (personal communication with Vashika Smith, Northwest Ecology Office, Bellevue, November 26, 2001). She stated that there is presently no schedule for total maximum daily load (TMDL) studies on the stream basins within the I-405 Corridor Program study area. The scoping process will begin in 2002, and monitoring of chosen streams will likely occur in 2003. Given the long-term nature of the I-405 Corridor Program and the Washington State Department of Ecology's (Ecology's) TMDL studies, there will be mutual benefit for both programs to coordinate closely.
L56	CU	8	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	8. Page 3.23-59: It is clear that alternative 3 will contribute substantially more to the problem and therefore may not be environmentally feasible without significant work on existing and future discharges either through a TMDL or other TMDL-like processes that show how WSDOT's discharges will not add to conditions.	Please refer to response L56.CU-7.

Code Number			Name	Comment	Response
L56	WR	22	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	1. Page 1: Several times in different parts of the EIS, statements such as "would not have any long-term effects" are made with no substantiation or references to studies that support this conclusion.	The instance cited appears to be a summary statement on page 1 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report, which states in part that the No Action Alternative and Alternative 1 "would not have any long-term substantial impacts to any of the basins." The Impact Analysis (Section 5) of that report presents considerable detail to substantiate this statement. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.
L56	WR	23	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	2. Section 3. 31: Water Quality Controls: The text states that there are "no permanent source control BMP's for roadways." There are source control BMP's for vegetation management within the right-of-way.	Thank you for your comment.
L56	WR	24	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	3. Water Quantity Controls: The text incorrectly indicates that quantity controls are necessary to prevent an increase in the amount of runoff leaving a site. Quantity controls are only intended to prevent the release of stormwater at flow rates that cause increased stream erosion or wetlands fluctuations. They do not control the quantity of stormwater leaving a site.	The comment is technically correct. Stormwater quantity best management practices (BMPs) are designed to prevent an increase in the peak flows from a developed site.

Code Number			Name	Comment	Response
L56	WR	25	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	4. Section 5.3: Alternative 1: Virtually the same pollutant loadings are predicted for the No- Action alternative as for Alternative #1. This is not intuitive, and is not adequately explained. Shouldn't construction of a rail alternative under alternative #1 result in a significant reduction (as compared to the No-Action alternative) in the total numbers of vehicles traveling I-405? Since the pollutant loading is proportional to the vehicle traffic, the pollutant load reduction should be substantial. In addition, the text indicates that the construction of auxiliary lanes will present a substantial opportunity for retrofitting most of I-405. So, inherent in alternative #1 lies an opportunity to further reduce the existing pollutant loading, and the future loading as compared to the No-Action alternative.	For the methodology used, average daily traffic (ADT) is the primary variable used in calculating suspended solids loading. The No Action Alternative and Alternative 1 have closely matching traffic projections along the various segments of I-405. The ADTs for the two alternatives range from 93,000 for the northernmost segment to 262,000 for the Kirkland-Bothell segment. While Alternative 1 may present a better opportunity for stormwater retrofit, the pollutant loadings presented in the analysis assume no stormwater treatment. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.
L56	CU	9	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	1. The language relating to growth is somewhat unclear. The Overview of page 1-1 describes induced (i.e. enabled or encouraged) growth, yet the DEIS asserts that no growth will occur because of this project (see pp. S-15, 3-1, 3.5-14, etc.). Section 3.23-21 through 32 indicates that Alternatives 3 and 4, in contrast to the No Action Alternative and Alternative 1, will enable and encourage growth by providing capacity for local traffic on the freeway. This seems to contradict the statement on pp. 3.23-14 that if transportation doesn't occur, then planned growth will be unable to occur. We suggest some clarifying language for this topic as the cumulative effects of growth can, in turn, lead to adverse impacts to air and water quality and other natural resources. Ultimately, decision-makers must be informed of all the environmental ramifications of each alternative so they can make an informed decision.	Clarification has been provided in the Final EIS. Neither the Draft nor the Final EIS states that growth would be "induced" or "encouraged" by the I-405 Corridor Program. The documents state that the I-405 Program "supports" and "accommodates" planned growth in the region. The EIS, however, does state that transportation accessibility may influence pressures on growth and therefore affect environmental resources. Pressures on growth related to environmental resources are discussed in Section 3.23 Cumulative Impacts.

Code Number			Name	Comment	Response
L56	TR	1	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	2. In 1.2.1.1 Travel demand, the second paragraph states: "WSDOT's most recent traffic count data (1999) show the lowest I-405 traffic volumes, 95,000 vehicles per day, in the north end between SR 522 and I-5 at Swamp Creek, and the highest, 210,000 vehicles per day, between I-90 and SR 520. The section south of Kirkland to SR 520 carries 185,000 to 195,000vehicles per day and the section south of I-90 typically carries150, 000 vehicles per day. Figure 1.2-1 shows these findings. This variation in traffic volumes is the result of different travel demands within the corridor as well as the available capacity on the freeway." However, Figure 1.2-1: Daily Traffic Volumes at Selected Locations on I-405 does not correlate to or reflect the text data provided in 1.2.1.1. cited above. Figure 1.2-1 rather reflects different locations and projects 2020 volumes due to no action compared to 1995 data. 1999 data appears to be missing.	These data have been made compatible in the FEIS in Section 1.2.1.1 and Figure 1.2-1.
L56	TR	2	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	3. There are no estimates of vehicle miles traveled within each of the alternatives considered. Vehicle miles traveled would provide data to estimate solid waste generation from vehicle operations, litter accumulation, greenhouse emissions, etc. It would provide a consistent measure across all alternatives that would be easily comparable. There is no ability to estimate vehicle miles traveled based on information provided.	VMT results are provided in the FEIS in Tables 3.12-3, 3.23-12, and 3.23-16. VMT results were used in air quality, noise, and related studies.
L56	TR	3	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	4. The information in the transportation model used in the DEIS is not easily discernible and seems to conflict with other information relating to the effects of the various modes of transportation discussed in the document (e.g. "Our Built and Natural Environments", USEPA). Such apparent contradictory information in a document as critical as the DEIS, should be further analyzed and clarified.	It is not clear what this comment means in terms of the types of information or places where the commentor believes there are conflicts.

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L56	TR	4	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	5. It is not clear that the cost estimates take into account the expectation that Alternatives 1 & 2 would be done the soonest (see Executive Summary, p. ES-11). A significant cost to the public is the inconvenience and delays attendant on construction. According to the "Statistics of interest" on the FAQ page (http://www.wsdot.wa.gov/I-405/overview/overview.cfm#why), congestion in the Seattle-Everett area costs $930 per person per year. In an area of 2 million people, that's $1.86 billion per year. The statistic does not mention how much of this is in the I-405 corridor, or how much is anticipated to be relieved by the project. Assume that 1/3 of the area's congestion is in the I-405 corridor, and that one quarter of that would be relieved. That's a savings of $150 million per year in congestion not suffered. If alternative 3 would be done 3 years after alternatives 1 and 2, that's $450 million that should be added to its cost in delayed savings from reduced congestion. This problem is exacerbated by the additional delays created by construction activity itself. The longer construction continues, the more congestion is created during construction.	The cost estimates are reported in constant 2000 dollars. The expected time frames for completion of each alternative are described in Sections 3.12.4.2, 3.12.4.3, 3.12.4.4, 3.12.4.5, and 3.12.4.6 of the Final EIS. The companion benefit-cost analysis explicitly considered the time frame of implementation. We cannot respond directly to the congestion costs cited as they were not used in the study. However, we agree that delays in making improvements will cost substantial amounts of money in terms of added delays.
L56	TR	5	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	6. HCT v. BRT We recognize that the DEIS acknowledges that more information will be provided in the FEIS regarding the plans for a High Capacity Transit system (HCT) and a Bus Rapid Transit system (BRT). It is important that this information be provided.	The Preferred Alternative provides high-capacity transit in the I-405 corridor through a bus rapid transit system. In the BRT system, buses on I-405 would operate in the HOV lanes, stopping at stations provided along the facility. The HOV lanes would be managed, consistent with WSDOT policy, so that the buses would not be "equally stuck in traffic" as the general purpose lanes.

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				For example, what ridership assumptions went into the comparison of Alternative 3's reliance on BRT vs. HCT in Alternatives 1 & 2? A key element in making transit attractive and drawing travelers out of their cars is for transit to be immune to congestion. People stuck in traffic will not be tempted out of their cars just to get on buses that are equally stuck in traffic. (This raises the question of how accurate the designation Bus Rapid Transit is.) Does Alternative 3 envision a dedicated busway, complete with stations? If not, the congestion relief cannot be comparable to Alternatives 1 & 2. If so, its construction cost moves much closer to that of a fixed-guideway such as a train, and possibly more expensive to operate, as fewer passengers can be transported by each driver. If BRT is truly less effective at pulling cars off of roads than is HCT, then further congestion costs must be added to Alternative 3 compared to Alternative 2, and possibly compared to Alternative 1 as well.	
L56	TR	6	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	7. In light of SEPA's overriding aim to ensure that the alternatives presented meet the proposal's objectives while minimizing environmental impacts, we offer the following comments: · According to the description of current status, mass transit travel times are approximately twice that of a single occupancy vehicle (SOV), despite the congested state of the roadways. However, no alternative described includes a mass transit system where travel times are approximately equivalent to that of a SOV. Logic dictates that Alternatives 1 and 2 should be able to reduce travel times to those similar for an SOV, but the DEIS states that they do not. What were the assumptions for mass transit and SOV that caused the DEIS to predict the comparatively long mass transit travel times? Under what conditions, if any, could/would a mass transit system be approximately equivalent to that of a SOV?	The transit trips most likely to have travel times equivalent to or less than SOV travel times would be those with both origin and destination within walking distance of an HCT station. These trips represent a small proportion of total trips within the I-405 study area. Table 3.12-10 shows average travel speeds on I-405. For Alternative 1, average SOV travel speeds in 2020 would be 34 mph and 25 mph in the A.M. and P.M. peak periods, respectively. For the same Alternative 1 the average travel speed, including station stops, for the HCT line along the I-405 corridor would be 45 mph, considerably faster than the speeds for SOVs on I-405. During off-peak hours, the HCT speeds would remain the same, while general traffic speeds would increase. In Alternative 1, an HCT system was evaluated that would provide non-stop travel for a

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					person boarding the HCT at one location and that person's destination. These results are documented in the DEIS with transit ridership increases of around 25 percent. Such a system would provide the most competitive travel times compared with roadways for those persons with immediate access to the HCT. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.
L56	SCH	2	Therese Swanson PO Box 47600 Olympia, Washington 98504-7600 Agency: State of Washington Department of Ecology	· Assuming that Alternatives 1 and 2 will not be complete until 2015 and Alternative 3 will not be finished until 2018, can a reasonable evaluation be made of all the alternatives under the 2020 timeframe? Might there be a better context for impact analysis if the alternatives are analyzed over a longer time frame?	Year 2030 travel data were estimated to review transportation performance. More detailed impact analysis will be required at the project level. Funding availability will be a factor in how long it will take to complete construction under any of the alternatives.
L57	ALT	1	James C. Walker 13020 SE 72nd Place Newcastle, WA 98050-3030 Agency: Public Works, City of Newcastle	The City of Newcastle recognizes the urgent need for improvements to the I-405 corridor and we are pleased to have the opportunity to review the draft EIS document. I believe that the selection of a mixed mode alternative like alternative 3 is the only practical way to improve mobility in the corridor.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L57	TR	1	James C. Walker 13020 SE 72nd Place Newcastle, WA 98050-3030 Agency: Public Works, City of Newcastle	One issue of concern to the City not directly addressed in the report is preservation of the Burlington Northern Santa Fe rail right of way corridor. That corridor or portion of it could easily be the backbone of any future fixed mass transit system within the I-405 corridor. Obtaining that corridor for future transit use may be outside the scope of improvements considered for the I-405 corridor but we do not want to see anything initiated which would preclude future use of the rail right of way.	The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. Please refer to L52.TR-6 for discussion on your travel time concerns.

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L57	TR	2	James C. Walker 13020 SE 72nd Place Newcastle, WA 98050-3030 Agency: Public Works, City of Newcastle	Another concern of the City is the effect improvements to I-405 will have on the arterials that connect to I-405 from parallel arterials. The document adequately addresses the effect on parallel arterials but not on the arterials that feed directly on to I-405 that will see higher traffic volumes with reduction of congestion on I-405. We are particularly concerned with pedestrian safety along those roads in the City that would see higher traffic volumes but do not currently have adequate sidewalks.	The document indicates that arterials feeding into I-405 will experience increases in traffic volumes. This is one reason why each of the I-405 action alternatives includes improvements to connecting arterials. The Final EIS in Section 3.12 includes additional information on the magnitude of traffic increases within certain corridors. Designs will need to incorporate safe pedestrian facilities if they do not currently exist.
L57	TR	3	James C. Walker 13020 SE 72nd Place Newcastle, WA 98050-3030 Agency: Public Works, City of Newcastle	The criterion: Reduce Congestion on Study Area Freeways and Arterials Below Current Levels Area found on page 3.12-19 is not achieved for the road segment NE Park Dr. to I-90. Since this is a segment directly adjoining Newcastle we would like to see a solution that would decrease congestion along all segments of I-405.	The Preferred Alternative (Section 3.12.4.6 of the Final EIS) provides additional consideration of traffic improvements in the I-405 segment noted.
L57	ROW	1	James C. Walker 13020 SE 72nd Place Newcastle, WA 98050-3030 Agency: Public Works, City of Newcastle	We would like to see acquisition of real properties needed for highway system improvement occur as soon as practical to avoid further development on parcels to be acquired.	The City of Newcastle's need for information as soon as possible is understandable. Acquisition activities will occur as soon as practicable after sufficient design has been completed.
L58	O	1	Willie R. Taylor, Office of Environmental Policy and Compliance, 1849 C Street, N.W., Washington, D.C. 20240 Agency: U.S.Dept. of Interior, National Parks Service	This letter is in response to the Federal Highway Administration's request for the Department of the Interior's comments on the Draft Environmental Impact Statement and Draft Preliminary Section 4(f) Evaluation for the Interstate 405 Corridor Program, in King and Snohomish Counties, Washington. The I-405 Corridor Program is a national demonstration pilot study for the "Transportation Decision Making Process Improvement." This process moves the National Environmental Policy Act (NEPA) decision-making to the early stages of long-range planning for transportation projects and introduces concurrence and consensus points at key milestones and decision points.	Your comment is acknowledged.

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L58	REC	1	Willie R. Taylor, Office of Environmental Policy and Compliance, 1849 C Street, N.W., Washington, D.C. 20240 Agency: U.S.Dept. of Interior, National Parks Service	The I-405 Corridor Program Draft environmental Impact Statement and Draft Preliminary Section 4(f) Evaluation consider the broad issues associated with selecting an alternative at the programmatic level and do not focus on the specific design details or precise footprints of the nearly 300 individual transportation improvements under consideration. Accordingly, the Draft Preliminary 4(f) Evaluation states that "A detailed assessment of loss of park functions was not completed during this Tier 1 review." [Appendix H-6] The preparers made an early effort to identify public parks, recreational areas, historic sites and other Section 4(f) resources that might be affected by the I-405 Corridor Program. Within the study area, they identified 13 parks/recreational areas, 18 registered historic properties, and 3 recorded archeological resources that would potentially be affected by the proposed program. [Appendix H-1] Four of the park/recreational areas potentially affected by the I-405 Corridor Program were acquired or developed with assistance from the Land and Water Conservation Fund (LWCF). Mercer Slough Nature Preserve, Cedar River Park, Green River Gorge, and Interurban Trail are all LWCF-funded properties. If any of these properties are converted to non-recreational use, Section 6(f)(3) of the Land and Water Conservation Fund Act requires replacement property of equal or greater fair market value and equivalent recreational utility. This requirement applies if any portion of a property is converted, no matter how insignificant the conversion to non-recreational use might seem. For instance, the placement of highway lanes above a park would, in our opinion, constitute a conversion from recreational use even if some recreational use could continue at ground level. The Department of the Interior recommends consultation with the Interagency Committee for Outdoor Recreation (IAC) because State funds might have been spent on some of the affected properties, and there may be additional requirements associated with such funding. The Interagency Committee for Outdoor Recreation administers LWCF funds for the State of Washington. The address for the IAC is: Interagency Committee for Outdoor Recreation, Post Office Box 40917, Olympia, Washington 98504-0917. The Draft Preliminary 4(f) Evaluation indicates there is a potential for unavoidable impacts to five recreational resources. [Appendix H-10-11] These include three of the Land and Water Conservation Fund projects: Mercer Slough, Cedar River Park, and the Interurban Trail.	The Final Preliminary Section 4(f) analysis confirms that property ownership and, where necessary, consultation with the Interagency Committee for Outdoor Recreation (IAC) and other applicable state and local agencies on acquisition funding sources was completed. The 4(f) analysis identifies the property ownership, avoidance issues, and range of general mitigation measures. Reference to Section 6(f)(3) consultation has been added to the Section 3.17.4 impacts in the Recreational Resources Section of the FEIS. The National Parks Service and other appropriate agencies will have the opportunity to comment during the project-level NEPA and Section 4(f) analyses.

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				With regard to the cultural resources protected by Section 4(f) we are pleased to see that the Draft Preliminary 4(f) Evaluation indicates that typical mitigation measures for anticipated impacts on cultural resources include, among other actions, consultation with the State Historic Preservation Officer. We anticipate that decision-makers will carefully consider the impacts to Section 4(f) resources and make every effort to select a program-level alternative that avoids or minimizes harm to them. It is our understanding that there will be opportunities to comment during the project-level NEPA and Section 4(f) analyses. Please keep us informed as further planning and tiered environmental documents reveal site-specific, project-level details about alignments, project impacts and proposed mitigation measures.	
L59	O	1	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	In 1999 the Washington Department of Transportation (WSDOT) and the Federal Highways Administration (FHWA) invited the Washington Department of Fish and Wildlife (WDFW) to participate on the steering committee for the "Reinvent NEPA" pilot project for Interstate 405. We appreciate the opportunity to participate on this committee to discuss issues associated with our concerns regarding impacts to streams, lakes and rivers, and to suggest mitigation for impacts to fish and fish habitat related to this 20-year 33-mile corridor project. Staff reviewed the draft Environmental Impact Statement (DEIS) dated August 17, 2001. Although our technical comments are few at this time due to earlier review of the document, we do have some very important comments related to selection of a Preferred Alternative. WDFW asks that the FEIS provide enought information so that WDFW can insure that the following issues will be addressed:	Thank you for your comment.
L59	O	2	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	Avoidance should be the first mitigation option. Suggestions to avoid impacts include: choosing the least environmentally damaging alternative; and design concepts such as bridging entire stream beds, banks, and flood ways, elevating roadbeds over wetlands, and replacing culverts with bridges.	To help address your comments, WSDOT has prepared and is implementing a proposed early-action environmental impact mitigation decision-making process. In addition, commitments to specific mitigation have been added throughout Chapter 3 of the Final EIS. Also, please refer to the response to comment L52.SOL-11.
L59	FATE	1	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	There should be no net loss to fish or wildlife habitat, and preferably a net gain. All impacts to habitat must be fully mitigated and there cannot be a loss to fish or wildlife habitat. As a goal, WDFW would like to see a net increase in habitat. We will strive to make one or more of our habitat biologists available to your team as you develop specific mitigation options.	Thank you for your offer of assistance. The WSDOT Environmental Affairs Office is presently working on WSDOT's Draft Proposed Early-Action Environmental Impact Mitigation Decision-Making Process. This document coordinates specific programmatic basin-level mitigation with WRIA 8's "Near Term Action Agenda" for basin-level mitigation. Please also refer to response to comment L38.FATE-1.

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L59	SCH	1	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	Mitigation should be in place prior to project construction. When mitigation is constructed after a project, it is often less successful and effective. We support the concepts of advance mitigation, early action mitigation, and mitigation banking, and are working with WSDOT staff to further refine these concepts and their implementation to ensure survival and recovery of endangered and listed species.	Early mitigation will be an important component of implementation of the Preferred Alternative.
L59	O	3	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	More information will likely be needed on a selected preferred alternative (PA). Because a PA is not included in the DEIS, we are unable at this time to determine the impacts of that alternative or what mitigation is proposed for them.	Please refer to Chapter 2 and Chapter 3 of the I-405 Corridor Program Final EIS for a discussion of the Preferred Alternative and its potential adverse effects.
L59	WR	1	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	Avoidance and Minimization There is a direct link between increasing impervious surface and impacts to fish habitat. Studies have shown that aquatic ecosystems are affected at very low percentages of impervious surface, as low as 4 to 5%. At levels above 10%, the aquatic ecosystem is drastically changed in character and fish have difficulty in surviving. The Department's approach to this project is based on this direct link between impervious surface, increasing runoff during winter events, and lower summer flows, with the resultant impact on fish habitat.	Impervious surface was considered in the impact assessment for fish species (Section 3.8).
L59	O	4	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	We urge that a preferred alternative be crafted that incorporates as many techniques as possible that avoid increasing impervious surface above current levels, including: transportation demand management (TDM: incentives for commuters and employers to use transit, carpools, vanpools, buses, and bicycle modes); fixing key bottlenecks; and improving high occupancy vehicle (HOV) access. These are all ways of managing demand and which reduce the need for additional impervious surface.	All of the measures you suggest are incorporated into the Preferred Alternative. Please refer to Chapter 2 and Chapter 3 of the I-405 Corridor Program Final EIS for a discussion of the Preferred Alternative and its potential adverse effects.

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L59	ALT	1	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	The rationale for this comment and the link to salmon habitat is that fewer lanes leads to less impervious surface, which results in less impact to fish habitat, which promotes preservation of fish habitat and recovery of fish populations. Alternative 1 is an alternative that portrays this concept and as such we could support it.	As described in Section 3.8, the assessment of impacts to fish populations and habitat considered the amount of new impervious surface associated with the alternatives. Alternative 1 is the action alternative with the least increase in impervious surface, as shown in Table 3.8-3. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. In addition, please see Section 3.8.5, which identifies potential measures for mitigating impacts to fish and aquatic habitat.
L59	SCH	2	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	We strongly urge that any elements that involve substantial amounts of impervious surface, such as adding General Purpose (GP) or Express lane, be phased in later in the process rather than sooner. For example, expanding mass transit options first would make sense prior to adding GP lanes, since there is more incentive for commuters to use transit in the current congestion than if GP lanes are added first.	Impacts relating to increase in impervious surface area will need to be dealt with regardless of mode. A substantial amount of impervious surface will be added for transit related projects because supporting facilities such as park-and-rides and transit centers need to be constructed to make the system work. Avoiding or minimizing impacts relating to increase in impervious surface will be essential for project implementation. Project phasing for the various modes will depend on funding and prioritization by the implementing agencies and PSRC.
L59	SOL	1	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	We concur that elements of Alternative 2 that focus on using the Burlington Northern Right-of-Way (BNRR) for commuter or high speed rail do appear to have significant impacts to fish habitat when aligned at the surface. We ask that WSDOT pursue the design of such a facility where the track is not aligned at the surface. According to the DEIS, there is great potential for this type of design in Alternative 2 and impacts to fish and wildlife would be greatly reduced.	The technology or specific design of the HCT assumed in Alternatives 1 and 2 was not specified. However, care was taken to identify segments that would likely need to be elevated, tunneled, or surface in design. These assumptions produced an HCT system that made maximum utilization of existing rights-of-way such as portions of I-405 and the BNSF. The DEIS Appendix A.4 identified the alignment assumptions used in the HCT analysis. In conducting the environmental analysis, it became clear that the HCT system would have impacts whether it was at-grade, underground, or elevated. The DEIS captures what we believe is a reasonable worst-case set of impacts.

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					The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
L59	SOL	2	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	We also see the potential for using one lane of the existing highway (e.g., the existing HOV lane) as the roadbed for a fixed guide way or bus rapid transit system. It would seem that any system utilizing the existing lanes or built adjacent to existing lanes would likely have less impact to fish habitat than a new alignment which would cross more streams and wetlands that may have been previously unbridged.	While utilizing the existing HOV lane capacity exclusively for transit might reduce the need for added impervious surface compared to improvements within the BNSF right-of-way, the DEIS documented the need for continued use of the HOV lane for carpools and transit. The managed lane concept included in the Preferred Alternative (i.e, using two lanes in each direction on I-405 – the HOV lane and adjacent lane – for priority use by transit and HOV, with available capacity available to other users) could help accomplish your objective to more efficiently use the existing and planned roadway to maximize person throughput and minimize delay.
L59	FATE	2	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	Net gain in habitat and recovery of listed species of salmon Although the federal agencies have primary responsibility for the Endangered Species Act, WDFW asks that WSDOT join us in becoming a partner in salmon recovery for this project. The Governor=s Salmon Strategy states that salmon recovery and ESA response require partnerships at all levels and that the goal of the Strategy is Ato restore salmon, steelhead, and trout populations to healthy and harvestable levels and improve habitats on which fish rely.@ Only through partnering with the other state agencies can we hope to begin to address the issues of recovering salmon in the highly urbanized area east of Lake Washington.	Please refer to the response to comments L59.FATE-1 and and L38.FATE-1.

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				We advocate a net gain in fish habitat in the watersheds affected because there are listed fish present and because of the need to recover these species. In fact, a net gain in habitat is almost essential for the baseline condition not to continue to decline. For example, in implementing the guidance and best management practices (BMPs) from the newly issued Ecology Stormwater Manual, the decline of habitat will slow but will not reverse, since even with the best available science, these BMPs are not fully protective of fish and aquatic habitat. If WSDOT desires to address the issues of ESA and recovery, there will have to be more than the minimum implemented in terms of BMPs, for instance, committing to retrofitting of the entire roadway for stormwater treatment as a desirable goal for salmonid recovery. WDFW suggests that designers utilize technical assistance materials to protect and restore fully functioning aquatic and riparian habitat, such as the Management Recommendations for Washington's Priority Habitats: Riparian and the Aquatic Habitat Guidelines. Riparian zones make tremendous contributions to fish and terrestrial habitat and are critically important in species recovery. Mitigation concepts Some ideas have been outlined and concepts suggested, but to date a full mitigation package has not been shown to us. Such a package would include avoidance measures through design of bridges, fly-overs, etc., as well as use of early action mitigation that could take place in the watershed outside the road right of way. WDFW staff have been working with WSDOT staff on the concept of early action mitigation This work would build on the work of the newly formed Watershed Based Mitigation Subcommittee under the Transportation Permitting Efficiency and Accountability Committee (TPEAC) and would be a key concept in the mitigation of impacts in this highly urbanized corridor.	
L59	ALT	4	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	Information on impacts of the future Preferred Alternative On November 27, WDFW will receive a request for Concurrence on the PMT's Preferred Alternative (PA). This Concurrence under the Reinvent NEPA process signifies that we agree "the project information is adequate for the current stage of the process" and that "the project may proceed to the next phase without modification."	Please refer to Chapter 2 and Chapter 3 of the I-405 Corridor Program Final EIS for a discussion of the Preferred Alternative and its potential adverse effects. The deadline for agency concurrence on the Preferred Alternative and mitigation concept was delayed approximately four months until evaluation of the effects of the Preferred Alternative was complete and the mitigation concept and commitments were in place.

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				There has been discussion of a Preferred Alternative. This PA is not included in the DEIS. We are concerned that we will be asked to Concur on a Preferred Alternative for which the extent of impacts to fish and wildlife habitat have not been fully identified. If the PA is not one of the four presented in the DEIS, then any other Preferred Alternative will be "mixed and matched" from Alternatives 1 through 4, with possibly some other new concepts thrown in, such as "lane balance" and "managed lanes". This could make it difficult to quantify impacts to fish and wildlife habitat. We suggest that an addendum to the DEIS be compiled for the Preferred Alternative to quantify impacts to fish, wildlife, and surface water resources prior to agency concurrence. Another alternative might be to extend the deadline for concurrence until the publication date of the FEIS to include in that document an impact analysis of the Preferred Alternative and a Conceptual Mitigation Plan. We want to once again thank you for the opportunity to work with you on this exciting and complex project. If you need further assistance, please contact Terra Hegy of my staff at (360) 902-2597 or myself at (360) 902-2416.	
L59	O	5	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	1. On page c of the Fact Sheet, Department of Fish and Wildlife is named as a cooperating agency. This is a very specific term under NEPA. WDFW has not agreed to this status. Please correct this in the final EIS.	Please see the revision in response to your comment on page "d" of the Final EIS.
L59	WR	2	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	2. The document should make clear that some streams will continue to be impacted by all of the alternatives.	Nearly all streams will be impacted by each alternative to some degree. However, no long-term stream impacts were found to result from the No Action Alternative and Alternative 1. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.
L59	WET	1	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	3. There is insufficient analysis in the DEIS about the amount of riparian vegetation that would be impacted by construction activities and the quality of that riparian vegetation.	Riparian vegetation cannot be quantified or qualified at this programmatic level of analysis. The Draft EIS makes relative comparisons of the impacts to riparian habitat. Riparian vegetation impacts will be analyzed in more detail during the project design stage.

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L59	FATE	3	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	4. There is a recurring theme in the discussions of mitigation that WSDOT will address existing fish passage deficiencies. This ordinarily would not qualify as mitigation, since provision of fish passage is required by RCW 77.55.060.	Fish passage would be designed at all proposed projects. However, retrofitting of additional I-405 culverts beyond the vicinity of proposed projects could potentially be credited as mitigation beyond the RCW requirements.
L59	FATE	4	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	5. Page S-17. Prior presentations and documents have portrayed stream crossings as a measure of impact to fish. This criteria appears to have been dropped from the DEIS. That is unfortunate, as the only measures now appear to be riparian encroachments and impervious surface. Stream crossings was one additional measure that could be utilized.	Riparian encroachments include both stream crossings and locations where roads are parallel within the riparian zone (300 feet). Because activities within the riparian zone affect streams even if not disturbing the channel directly, changing from stream crossings to riparian encroachments seemed to be a better overall indicator for comparison of potential construction impacts among the alternatives.
L59	FATE	5	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	For instance, in earlier screening of the elements, data showed that "expanding arterials" has 47% more stream crossings than the proposed new 605 highway in rural east King County would have had. This was an interesting piece of information that is now lost.	The 605 highway was removed from the list of projects after the element screening report. Please also refer to response to comment L59.FATE-4.
L59	FATE	6	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	6. Page 3.8-7 para. 1, last line: Discussion fails to recognize the extensive spawning by sockeye salmon and longfin smelt in the lower Cedar River.	Spawning of sockeye salmon and longfin smelt in the lower Cedar River has been noted in the Final EIS.
L59	FATE	10	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	7. Page 3.8-10 Alt. 2 and 3 both need to say if riparian encroachments are "new" or not, to be consistent with Alt. 1 and 4.	In all of the action alternatives there is a combination of new encroachments and expansions of existing encroachments. All are lumped together because all are likely to cause riparian disturbance. The text in the Final EIS has been clarified.
L59	FATE	7	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	8. 3.8-11 The discussion on stream impacts due to the various alternatives is sparse, just a few sentences. It should be more extensive, perhaps drawing from information in the expertise report, particularly in light of the fact that one of the most significant impacts due to this project is to listed salmonids. Perhaps it is assumed that the reader will research the expertise report; however, reviewing the DEIS a person would not have enough information to determine impacts of that alternative, or of any, on fish, except for the one criteria, riparian encroachments.	The EIS is meant to include only summary findings of expertise reports. It would be difficult to include full detail on all resources in the EIS.
L59	FATE	8	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	9. 3.8-11 There is no discussion on potential for avoidance of impacts such as was given in the wetlands chapter. I found this particularly useful in determining how wetland impacts might be avoided. The chapter on fish should have similar discussions on avoidance measures in some detail, and perhaps some graphics to illustrate concepts such as spanning streams.	Additional discussion was added to the Final EIS in Section 3.8.5 describing avoidance mitigation strategies.

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L59	FATE	9	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	10. 3.8-12 Mitigation measures. This is a new section and is interesting laundry list of potential mitigation concepts. However, the compensatory measures are not commitments at this time. Agencies will be asking for commitments for mitigation prior to granting approval for a specific alternative.	Please refer to response to comment L38.FATE-1.
L59	WET	3	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	11. 3.6-8 to 12: Reviewer is unable to locate the number of acres of high priority wetlands. There are acres of total wetlands, and there are numbers of wetlands and of high priority wetlands. But the document does not give numbers of acres of high priority wetlands.	The National Wetlands Inventory, and other sources where available, was utilized as indicated in Section 3.6.1.1. See response to L41.WET-1.
L59	WET	4	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	12. P. 3.6-8 Para. 3, line 2. "Encroachment" should be changed to "fill". An encroachment might be grading or mowing or some possibly temporary disturbance; fill is the addition of material that permanently alters the nature of a wetland.	Encroachments include all types of impacts, including but not limited to fill.
L59	WET	5	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	13. P. 3.6-9. Table 3.6-2 should have the totals with the No Action Alternative included.	Table 3.6-2 has been changed to reflect your request. This table is Table 3.6-5 in the Final EIS.
L59	WET	6	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	14. P. 3.6-10. Para. 4 "305 acres of impervious". Is this in addition to the No Action Alternative? This should be made clear.	This has been clarified in the Final EIS.
L59	WET	7	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	15. P. 3.6-11, next to last line. "New roads". It is not clear why new roads would be built in this alternative which focuses on transit.	Alternative 2 emphasizes transit but does not eliminate the need for other modes of transportation. Additionally, the alternative requires local bus transit, which operates on the road system.
L59	WET	8	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	16. P. 3.6-13, line 2. "Two GP lanes" should be "for a total of four lanes" for clarity to the non-transportation reader.	This point has been clarified in the Final EIS.
L59	WET	9	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	17. P. 3.6-13, line 4. "Widen SR 167". The reader should note the PPA differs from Alt. 3 in that the former involves adding two lanes each way on SR 167 and additional impacts are likely to result.	The preliminary preferred alternative was never an approved alternative, and therefore it is not considered in the EIS. The Preferred Alternative includes 2 additional lanes on SR167 from I-405 to 180th. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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L59	WET	10	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	18. Table 3.6-6 (for Alt. 3) and Table 3.6-7 (for Alt. 4) both have a line showing General Purpose (GP) lanes with total impacts to wetlands of 62. However, Altern. 3 should be more than 62, maybe as much as double the impacts, since Alt. 3 has 2 GP lanes and 4 has 1 GP. This could be a significant error. If this is correct, please explain why.	The area of wetland impacted will differ and is considered in the area estimates (Table 3.6-5). However, the number of wetlands impacted remains the same. Any wetland that may be impacted by the addition of 2 lanes in each direction would also likely be impacted by the addition of a single lane in each direction, although the acreage of impact would change. This change in acreage of impact is calculated for each project.
L59	WILD	1	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	19. There are many more songbird species in the study area than listed in 3.7.3.3 Wildlife. If PMT would like a list, Trish Thompson of WDFW could provide one. The corridor habitat is less important for many of these songbirds, meaning that even if habitat is not there, does not mean there is no wildlife to speak of	The species mentioned are examples of those that most commonly occur in the respective right-of-way habitats. The wording has been revised to better clarify this and a more comprehensive list of species has been added.
L59	WILD	2	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	There is a waterfowl concentration area in north Lake Sammamish.	The waterfowl concentration area north of Lake Sammamish has been identified in the EIS.
L59	WILD	3	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	There are at least 5 more osprey territories along I-405 study area, including one right off of I-405: two in Bothell in the area of HWY 527 and I-405; Meydenbauer Bay, Bellevue; Boeing Renton cell tower; Tukwila cell tower. These territories should be available on PHS data, if not, please call WDFW Jennifer Brookshier of WDFW should have those territories.	The PHS data were re-checked to determine if additional osprey territories are identified in the study area that were not discussed in the Draft EIS. The Final EIS has been revised to address osprey territories that are documented and that were not previously identified.
L59	WILD	4	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	Does the list of great-blue heron rookeries include the large one in Kenmore (Bothell)?	Inclusion of the Kenmore great blue heron rookery has been confirmed. It has been added to the five areas referenced in the EIS.
L59	WILD	5	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	Red-tailed hawks and northern harriers us the Kent valley extensively. Red-tails use the Woodinville/Redmond area heavily also.	Red-tailed hawk and northern harrier occurrence in the Kent Valley has been addressed in the EIS.
L59	WILD	6	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	3.7.3.3 Wildlife paragraph 6: please note, species do use ROW areas, as well as other songbird species.	Section 3.7.3.3 paragraph 6 does acknowledge the use of right-of-way areas by wildlife species. The wording in the EIS has been revised to more clearly convey this.
L59	WILD	7	Greg Hueckel Agency: Habitat Program, Department of Fish and Wildlife	Paragraph 8 - Pileated Woodpeckers are in the urban forest and could potentially use the forested ROW's also. Pileated woodpeckers have been seen crossing I-405.	Pileated woodpecker use of forested habitats in right-of-ways has been included.

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L60	U	1	Darryl Eastin 19100 44th Ave, W. PO Box 5008 Lynnwood, WA 98046-5008 Agency: Community Development Dept. City of Lynnwood	Public Works Department: No response	Your comment is acknowledged.
L60	O	1	Darryl Eastin 19100 44th Ave, W. PO Box 5008 Lynnwood, WA 98046-5008 Agency: Community Development Dept. City of Lynnwood	Building Division: No comment. Ken Korshaven, Building Official 10/01/01	Your comment is acknowledged.
L60	O	2	Darryl Eastin 19100 44th Ave, W. PO Box 5008 Lynnwood, WA 98046-5008 Agency: Community Development Dept. City of Lynnwood	Police Department: No response.	Your comment is acknowledged.
L60	O	3	Darryl Eastin 19100 44th Ave, W. PO Box 5008 Lynnwood, WA 98046-5008 Agency: Community Development Dept. City of Lynnwood	Provide for adequate fire and emergency medical access in the area. Insure the availability of water from fire hydrants for freeway type incidents. Gary Olson, Operations Chief 9/28/01	We agree that adequate fire and EMT service access and fire hydrants (or an approved optional system) will be an element of constructed projects.

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L60	O	4	Darryl Eastin 19100 44th Ave, W. PO Box 5008 Lynnwood, WA 98046-5008 Agency: Community Development Dept. City of Lynnwood	Parks and Recreation Department: Recommend providing for pedestrian and non-motorized connections to transit centers; enhance landscaping; provide pedestrian 'nodes'; minimize impervious surfaces. Laurie Cowan, Parks Planner 10/01/01	Pedestrian and non-motorized connections will be an element of the transit centers. Minimizing impervious services where possible will be an objective as that will serve aesthetic and bio-filtration purposes.
L60	O	5	Darryl Eastin 19100 44th Ave, W. PO Box 5008 Lynnwood, WA 98046-5008 Agency: Community Development Dept. City of Lynnwood	Finance Department: No comment. Mike Bailey, Administrative Services Director 9/28/01	Your comment is acknowledged.
L60	O	6	Darryl Eastin 19100 44th Ave, W. PO Box 5008 Lynnwood, WA 98046-5008 Agency: Community Development Dept. City of Lynnwood	Edmonds School District: N/A	Your comment is acknowledged.
L60	O	7	Darryl Eastin 19100 44th Ave, W. PO Box 5008 Lynnwood, WA 98046-5008 Agency: Community Development Dept. City of Lynnwood	Snohomish Health District: N/A	Your comment is acknowledged.

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L60	O	8	Darryl Eastin 19100 44th Ave, W. PO Box 5008 Lynnwood, WA 98046-5008 Agency: Community Development Dept. City of Lynnwood	Other Agencies: N/A	Your comment is acknowledged.
L61	O	1	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	In response to the Department of the Interior's Office of Environmental Policy and Compliance's memorandum dated August 29, 2001, we have reviewed the subject content and offer the following comments for the Department's response to ER 01/0827. PROJECT DESCRIPTION The proposed I-405 Corridor Program proposes to implement a multi-modal system of transportation improvements throughout the I-405 corridor over the next 20 to 30 years. The Program area is the 30 mile-corridor along I-405 between the I-5 interchanges at Tukwila, King County and Lynnwood, Snohomish County. The project area includes part of State Route (SR) 167 from the I-405 interchange in Renton to Kent, King County. The DEIS includes five alternatives, including the "no action" alternative. Within each of the proposed alternatives is a list of potential projects which would be constructed as part of that alternative. The Department of the Interior (Department) has reviewed the document and offers the following comments:	Thank you for your comment.
L61	O	2	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	GENERAL COMMENTS Adequacy of Information The DEIS refers the reviewer frequently to other documents to obtain additional information regarding project impacts. This includes information contained in the expertise reports developed in support of the DEIS. Since this information was not specifically included in the DEIS, it was difficult for the Department to determine if the conclusions reached were substantiated, or if the information requested below was available in these other documents. For	The size of the I-405 Corridor Program study area, variety of transportation improvements, range of potential effects, and complexity of the study required that choices be made concerning which data and analyses to incorporate into the Draft EIS. It is regrettable that you were unable to conduct your review fully; however, placing the supporting technical studies on a searchable compact disk is the most effective, efficient, and convenient way to make such a large volume of material readily available to the public and reviewing agencies.

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				example, on Pg. 3.7-8, the reviewer is referred to the Fisheries and Wetlands expertise reports to view which projects may extend beyond existing right-of-ways and result in the loss of bald eagle perch trees and prey habitat. Without this information being more readily accessible, the reviewer is unable to determine which projects may result in these potential impacts. This further limits the ability of our review to distinguish between the impacts associated with each alternative. We (through the U.S. Fish and Wildlife Service) requested and received a copy of the compact disk containing this information. Due to time constraints, we were unable to search each document to determine if the additional information was presented. We recommend that the pertinent sections of these reference documents be incorporated into the body of the FEIS or, at a minimum, be provided as attachments to the FEIS to better enable the reviewer to evaluate the documentation and potential impacts associated with the proposed alternatives.	
L61	O	3	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Project Impacts All alternatives, including the no action, will result in some level of impact to the terrestrial and aquatic environment. The impacts to special aquatic sites, including wetlands, and riffle and pool complexes, are an important feature in the analysis of alternatives due to the need, under Section 404 of the Clean Water Act, to select the 'least damaging practicable alternative" as the preferred alternative. Permits for the proposed actions will be evaluated at a later date and will be based on an analysis of the individual or combination of projects within each alternative. Table 1 lists the potential impacts to wetlands and streams. (SEE ORIGINAL FOR TABLE, in attached Final EIS compact disk or on file at WSDOT Urban Corridors Office.)	Thank you for your comment.

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L61	WET	1	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	We recognize that the proposed impacts are presented as "worst case" due to the limited level of detail available regarding specific construction and avoidance measures. Wetland jurisdictional determinations have not been completed, therefore, the acreage of wetland impact could be either reduced or increased. The DEIS states that some values, such as those for Alternative 1, may be much less than stated, due to the high probability of avoiding wetland impacts through potential design features (i.e., elevating the HCT). Wetland avoidance opportunities are low for Alternatives 2, 3 and 4. The DEIS states that for the no action alternative, which has the least acreage of wetland impacts, the impacts of the proposals were determined to be below the level of significance. We respectfully disagree, based on the existing and continued loss of wetlands. According to the information provided, including the ability to minimize impacts of the action alternatives, Alternative 1 would result in the least acreage and number of impacts to the aquatic environment. This is an important consideration in the selection of a preferred alternative due to the past and continued loss of wetlands, and impacts to streams which contain federally listed species in the Puget Sound region.	The EIS identifies wetland impacts using a reasonable worst-case scenario, meaning that impact avoidance has been considered at this program level of detail. Further avoidance, minimization, and compensation of impacts to wetlands would be addressed in subsequent project-level documentation. The No Action Alternative includes committed and funded highway and transit capital improvement projects that have already undergone or would require project-level environmental analysis, documentation, and review. The I-405 Corridor Program EIS and expertise reports have been revised to not indicate a significance determination on the No Action Alternative impacts to wetlands.
L61	WET	2	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	The Department is unclear on how some of the wetland impact acreages were determined in the DEIS. For example, Alternative 2 will bisect many of the 81 wetlands it crosses. The acreage of impact for Alternative 2 is 12 acres (not including the impacts associated with the no action alternative). Bisecting wetlands may alter significantly more than just the area of fill. It is unclear if the stated acreage includes just the fill footprint, or if it incorporates the entire wetland due to potential changes in its hydrology and other functions. We recommend a description of what is considered a wetland impact be clearly stated for each alternative.	'Wetland impacts" has been more clearly defined in more detail in the impacts section (Section 3.6.4 in the Final EIS).

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L61	FATE	1	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	The number of stream crossings and encroachments within 300 ft of a stream has been provided by basin and in total per alternative. This number provides minimal information regarding the potential impacts of each alternative to streams, riparian habitat, and the aquatic environment. Information regarding the presence of aquatic species and their use of a stream (i.e., spawning, foraging); vegetation impacts, including removal and maintenance; whether the encroachment is within the channel migration zone of the stream; and if the encroachment is parallel or perpendicular to the stream would provide better information to portray the impacts associated with each alternative. Some of this information may be available in other documents at this time, while in other cases it will not be available until projects are further designed. If this information is currently available, we request it be provided in the FEIS.	See response to comment L41.FATE-4.
L61	O	4	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Compensatory Mitigation Mitigation for the proposed impacts is conceptual at this time. The Washington Department of Transportation (WSDOT) has been working with us (through the U.S. Fish and Wildlife Service) and other agencies to discuss and determine acceptable mitigation opportunities to compensate for unavoidable impacts. WSDOT should focus on mitigation proposals that result in the replacement of habitat functions, which are lost due to the proposed actions. The DEIS states that mitigation would be constructed in advance of wetland impacts, where feasible. We are very supportive of this proposal as a means of ensuring that unavoidable impacts to wetlands and other resources are fully compensated. The DEIS in several instances indicates that additional minimization measures would be "considered," "contemplated" or "encouraged." We suggest a commitment to implement mitigation measures to insure that resource impacts are avoided and minimized be provided in order to be considered during our review as a mitigation measure for implementation. The DEIS includes the potential use of mitigation banks and out-of-kind watershed restoration. While these are potential mitigation approaches, we suggest that your agency will need to provide sufficient rationale, including watershed plans, to demonstrate that	To help address your comments, WSDOT has prepared and is implementing a proposed early-action environmental impact mitigation decision-making process. In addition, commitments to specific mitigation have been added throughout Chapter 3 of the Final EIS. The I-405 co-lead agencies realize they must mitigate stormwater impacts to the extent required by existing laws and regulations, any policies adopted by local agencies pursuant to the State Environmental Policy Act (SEPA) and Growth Management Act (GMA), and any permits obtained for the I-405 project, including any National Pollution Discharge Elimination System (NPDES) permits and/or Hydraulic Project Approvals (HPAs) issued in accordance with Ecology's new stormwater manual or functionally equivalent guidance. The co-leads also recognize they must mitigate any site-specific stormwater impacts by first avoiding, and then minimizing (to the extent practicable) those impacts before they can use compensatory mitigation to then mitigate any remaining stormwater impacts. We also understand that it may be necessary to go beyond the application of BMPs within the project right-of-way or construction areas to minimize these stormwater impacts (if the BMPs prove to be insufficient). WSDOT will also be prepared to demonstrate that any

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				their use would result in greater environmental benefit, and would be environmentally preferable to in-kind, on-site compensatory mitigation. Mitigation for some impacts may need to be on-site, or within the sub-basin where the impact has occurred, to fully off-set the impacts associated with the action. The use of habitat preservation is also included in the DEIS as potential compensation for project impacts. Although the U.S. Fish and Wildlife Service Mitigation Policy (USFWS, 1981) allows for preservation, your agency would need to show habitat was at risk of loss, and that there were no existing laws, regulations, easements, etc., that would provide adequate protection from development, or other purposes. Preservation as mitigation has been used only rarely, and seldom without the inclusion of other types of compensatory mitigation. We strongly recommend that other mitigative measures be evaluated and discussed in the FEIS prior to proposing preservation. We are concerned with the suggestion of retrofitting existing I-405 pavement areas to obtain credit as "out-of-kind" compensatory mitigation. Your agency's current drainage policy is to treat stormwater runoff for 140 percent of new impervious surface. Treatment of greater than 100 percent of the stormwater generated from new facilities is typically performed because current methods are not 100 percent effective. In some cases, treatment of 140 percent of the stormwater generated, while minimizing impacts to aquatic species, including bull trout, still results in degradation and impacts to the aquatic system. We believe treatment to the new Department of Ecology (DOE) stormwater manual for Best Management Practices (BMP), which is greater than 140 percent treatment, should be viewed as the minimum, which will be necessary for any additional impervious surfaces that result due to	on-site or off-site use of supplemental treatment will occur in accordance with the Alternative Mitigation Policy Guidance Interagency Implementation Agreement between WSDOT, Ecology, and WDFW, and the agency does not intend to use supplemental treatment to generate "extra credit" for use off-site.

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				a proposed alternative. No additional mitigation credit will be generated for use on other projects if only 140 percent treatment or the DOE stormwater manual for BMPs is used. Additionally, treatment beyond the DOE stormwater manual may be required on a case-by-case basis to minimize site specific impacts. In these cases, this additional treatment would not generate "extra credit" for use off-site. To generate and use out-of-kind mitigation credit from stormwater treatment, it may only be generated after all mitigation necessary to meet a specific project exceeds the DOE stormwater manual, and if any additional measures necessary to minimize on-site impacts from stormwater runoff. Also, it would be necessary to demonstrate that out-of-kind mitigation is environmentally preferable to in-kind mitigation. This demonstration will require supporting documentation, such as a watershed plan, to demonstrate why this mitigation is more environmentally beneficial and preferred over in-kind mitigation. We do not anticipate at this time that use of stormwater treatment as mitigation for out-of-kind impacts, such as loss of wetlands and streams, would be appropriate in most cases due to the inability to fully replace the functions of these habitats through stormwater treatment. A number of mitigation opportunities have been identified in the DEIS by local jurisdictions, which are likely to be proposed as compensation for unavoidable impacts. Some of these mitigation projects target the restoration of the sub-basin or watershed, as opposed specifically to mitigating for impacts associated with the proposed alternatives. While we will consider some of these proposals to be acceptable, others are inappropriate as mitigative measures if they do not result in actual improvements to the environment. Examples of the latter include funding monitoring projects and inventories. Additionally, proposals which do not address the problem, but only a symptom (such has dredging sediment deposits), are unlikely to receive strong support from the Department, as they do not result in long term resource benefits. Additionally, funding or partially funding a restoration project is not sufficient compensatory mitigation unless there is a specific timeframe and commitment to implement and monitor the project to ensure its success.	

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L61	FATE	2	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Impervious Surface Impacts The DEIS states that work by May et al. (1997) has found that stream health within a sub-basin is degraded when impervious surfaces are approximately 10 percent of the sub-basin. All of the sub-basins that may be impacted by the proposed alternatives, including the no action alternative, are already beyond this 10 percent threshold (Table 2). They are, therefore, likely to have sustained some degradation in their aquatic functions, which would be further degraded with any increase in runoff from new impervious surfaces, unless the runoff is fully treated and infiltrated. (SEE ORIGINAL FOR TABLE, in attached Final EIS compact disk or on file at WSDOT Urban Corridors Office.)	Your statement is correct. The co-lead agencies are currently working on an early action environmental impact mitigation strategy to minimize additional hydrologic impacts. This strategy has been designed to coordinate closely with the WRIA 8 Near-Term Action Agenda in order to prevent further degradation of the environment.
L61	WR	1	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	The DEIS states that no substantial effects on hydrology or water quality are expected for either the no action alternative or Alternative 1. We respectfully disagree with this statement, and believe that the impacts may be significant on both an individual and cumulative scale, due to the existing degraded condition of the sub-basins, as indicated by the percent impervious surface. The level of impact would depend on the amount of existing and proposed impervious surface and treatment in each sub-basin, as well as existing conditions of the stream and riparian corridor. We request the FEIS include a reevaluation of the effects to hydrology and water quality that would result as a result of the no action alternative, and Alternative 1.	The comment implies that any hydrologic impact to any of the basins within the study area may be considered a significant surface water impact because of the level of existing development that has already impacted the streams. We do not not believe this to be a valid assertion. The I-405 Corridor Program DEIS presents a set of reasonable criteria for determining likely significant water resource impacts. These criteria are suitable for the programmatic level of environmental analysis that has been conducted. These same significance criteria were presented in Section 5.1 of the I-405 Corridor Program Draft Surface Water Resources Expertise Report and reviewed by the resource agencies and others in February and March of 2000. With regard to cumulative impacts, it is concluded under the cumulative impact analysis that water resource impacts would be substantial and adverse (third paragraph under "Cumulative and Secondary Effects of I-405 Corridor Program Alternatives" in Section 3.23.4.3 of the Final EIS).
L61	CU	1	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	In addition, the DEIS cumulative impacts section states an additional 11,000 acres of impervious surface (due to increased employment and housing) are likely to occur within the project area, over the next 20 years. Cumulative effect is substantial and adverse for all alternatives (including the no-action). Potential indirect impacts associated with increased growth may be associated with the build alternatives (e.g., direct and indirect effects on growth). Although the amount of impervious surface associated with this growth is not stated, the expected changes in growth for each alternative, are listed in (Table 3). Growth (and associated impervious surface) varies	Increasing infiltration has been identified as an objective of the I-405 Corridor Program Final EIS and can be found in the Water Resources mitigation measures in Section 3.5.5 of the Final EIS, as well as in the I-405 Corridor Program's corridor environmental program and early action mitigation process.

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				slightly by alternative. Although the percent change may be small (>2 percent in the action alternatives), any increase in growth will result in cumulative impact, and stress on the already compromised aquatic system. This concern points out the obvious need to focus on increased infiltration and forest cover, solutions which should be an objective of any alternative that is eventually selected. (SEE ORIGINAL FOR TABLE, in attached Final EIS compact disk or on file at WSDOT Urban Corridors Office.)	
L61	FATE	3	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	We request the FEIS include a definition of "impervious surface" that include lawns in addition to roads, houses, sidewalks, etc. Additionally, there are different numbers provided in different sections of the DEIS regarding the existing level of impervious surfaces. These should be clarified and/or corrected.	The co-lead agencies respectfully disagree with your definition of impervious surface. Lawns are much more permeable than pavement or rooftops, and are only considered to count as 50percent impervious (i.e., 50 percent pervious) at most. The co-lead agencies have clarified and made consistent the assumptions made in developing quantitative assessments of impervious surface in the Final EIS.
L61	O	5	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Endangered Species Act There are currently two federally listed species under the U.S. Fish and Wildlife's jurisdiction within the project area. These are the bull trout and bald eagle. Since the DEIS is not at a project level at this time, consultation on the proposals is not required. The Department requests that when the FEIS is completed, the Federal Highways Administration (FHWA) should consult with the U.S. Fish and Wildlife on the entire preferred alternative at the programmatic level.	FHWA and WSDOT will coordinate with USFWS to define the appropriate method for programmatic Section 7 consultation on the I-405 Corridor Program Preferred Alternative.

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				Each project would then be consulted on individually tiering off the programmatic consultation. The alternative needs to be consulted on in this way to fully evaluate the direct, indirect, interdependent and interrelated actions, and cumulative impacts to determine if the overall effect on listed species may jeopardize their continued existence. Additionally, the action area will extend beyond the project area described in the DEIS due to the increased housing, and employment impacts projected to occur outside of this area due to the selected alternative. The action area would potentially encompass the areas included between Dupont, Pierce County to Mount Vernon, Skagit County, and parts of Kitsap County to North Bend, King County. We will work with National Marine Fisheries Service and FHWA to define the action area that will need to be addressed in the consultation.	
L61	WILD	1	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	We have the following comments regarding the potential impacts to bald eagles and bull trout from the proposed alternatives, which we believe will assist your agency in future consultations. The information on potential impacts to bald eagles presented in the DEIS is not detailed enough for the Department to determine how significantly each of the alternatives would impact this species. The DEIS provides the linear feet of habitat that may be impacted within a bald eagle territory. In some cases, riparian habitat will be removed. This could negatively impact the bald eagle, depending on the type and quantity of habitat removed. To minimize impacts to bald eagles, in addition to the timing restrictions proposed, the projects should avoid the removal of potential or known perch or roost trees.	Lineal feet was used as unit of measure for comparison only. An accurate measure of area cannot be made at this programmatic level of analysis. PHS habitat is used as the indicator of bald eagle habitat. Removal of individual trees and timing restrictions cannot be addressed at this programmatic level, but will be addressed during the project-level analysis.
L61	FATE	4	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Due to the existing degraded watershed conditions and the increased proposed impervious surfaces included under all the alternatives (including the no action alternative), all of the proposed alternatives are likely to negatively impact bull trout and their forage species unless measures to significantly minimize these impacts are incorporated into the proposed projects. Impacts to base flow typically are not fully mitigated by stormwater treatment facilities. Minimization measures for bull trout and their forage species, such as improved infiltration or the removal of impervious surfaces within the sub-basin, should be utilized to reduce impacts.	The co-lead agencies acknowledge the comment. Minimization of stormwater runoff impacts including infiltration where possible will be addressed at the project level and strategies presented in the early-action mitiagtion strategies. No opportunities for compensatory removal of impervious surface elsewhere in the basin have been identified.

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L61	O	6	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Concurrence on Preferred Alternative The proposed action is part of a pilot under the NEPA reinvention process. We have been part of the development of the process as well as a member of the Steering Committee for this pilot. As part of the process, our agency will be asked to concur on a preferred alternative. Our concurrence, if given, will establish our position on what actions can go forward into the next stage of review/permitting. Each of the alternatives, including the no action, includes a number of proposed projects (Table 4). (SEE ORIGINAL FOR TABLE, in attached Final EIS compact disk or on file at WSDOT Urban Corridors Office.) We will, therefore, be unable to concur on any of the proposed alternatives if it would restrict our future request for an alternative analysis of a specific project, or prevent our objection to an individual project within the preferred alternative. Our concurrence, if given, will pertain to the overall major elements incorporated into the preferred alternative. These 23 major elements are provided in Appendix A of the DEIS, and are not repeated here.	Agencies with jurisdiction are allowed to concur with conditions. It is not the intent of the co-lead agencies to prevent project-level environmental review and input from USFWS or others. Also, concurrence is on the major elements of the I-405 Corridor Program Preferred Alternative; this requested concurrence does not indicate individual project concurrence.
L61	O	7	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	SPECIFIC COMMENTS Signature Page (no page number): The U.S. Fish and Wildlife Service is listed as a cooperating agency in the DEIS. This is incorrect. The I-405 corridor program is a pilot in the Reinventing NEPA pilot process. The Department (through the U.S. Fish and Wildlife Service) has participated as a member of the Steering Committee, established for the I-405 corridor program. Membership in this Steering Committee does not constitute the same standing as a cooperating agency as defined by NEPA (C.E.Q. Regs., Sec.1501.6) . We request your agency remove the U.S. Fish and Widlife from the list of cooperating agencies in the FEIS.	Please see the revisions in response to your comment on page "d" of the Final EIS.

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L61	WR	2	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. S-27, Section 3.5, Summary of Mitigation, No Action Alternative: "Construction activities which are within 300 feet of a lake or stream, or where concentrated construction site discharges may flow directly to surface waters, all site grading and initial stabilization would be scheduled to occur only during the dry season, April 1 through September 30." The Puget Sound area continues to receive heavy rainfall through May. Therefore, these activities should not occur until after June 1. Please reference this comment to all alternatives.	King and Snohomish counties and many of the cities have more restrictive grading and cover restrictions that apply during the period between October 1 and April 30. This mitigation is revised to read "May 1 through September 30" (Table S-2, Section 3.5, Water Resources, third paragraph of last column).
L61	WR	3	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. S-28, Section 3.5, Summary of Mitigation, No Action Alternative: "Where water quality data indicate degraded baseline conditions in the receiving waters, enhanced stormwater treatment would be considered." The document states that many of the streams which may be affected by the proposed alternatives are on the Department of Ecology's 303(d) list due to exceedance of a water quality standard. Even for those streams, which are not on the list, existing stormwater treatment is not sufficient to meet the needs of listed fish species. We suggest a commitment to perform enhanced stormwater treatment be made in most, if not all, cases. Please reference this comment to all alternatives.	The Washington State Department of Ecology's Stormwater Management Manual for Western Washington requires that enhanced treatment be given to stormwater runoff from highways and arterials. The I-405 Corridor Program will adhere to that requirement or functionally equivalent guidance. See response to comment L56 WR-4.
L61	WR	4	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. S-28, Section 3.5, Summary of Mitigation, No Action Alternative: "Disturbed riparian areas within the road right-of-way would be planted with native vegetation for a minimum width of 100 ft from each stream bank." We concur with the use of native plant species indigenous to the local area. The mitigation should also state the minimum distance that vegetation would be planted from the stream and the type of vegetation. Woody, as well as herbaceous, species should be planted to increase the habitat complexity and value to wildlife and aquatic species. Please reference this comment to all alternatives.	The information requested in the comment would be highly site-specific. This information will be developed during the design phase of the individual projects.

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L61	WR	5	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. S-28, Section 3.5, Summary of Mitigation, No Action Alternative: We suggest all refueling should be over contained areas. Please reference this comment to all alternatives.	This mitigation has been reworded to incorporate the requirements or functionally equivalent guidance under the Guidelines for Mobile Fueling of Vehicles and Heavy Equipment (The Washington State Department of Ecology's Stormwater Management Manual for Western Washington).
L61	WR	6	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. S-29, Section 3.5, Summary of Mitigation, No Action Alternative: "Do not store large quantities of hazardous construction materials in sensitive areas." Even small amounts of hazardous materials can have a significant negative impact on sensitive areas should they be discharged into the environment. Hazardous materials, in general, should not be stored in any quantities within 300 ft of sensitive areas. We suggest containment measures should be in place prior to construction, to prevent any accidental spillage into sensitive areas. Please reference this comment to all alternatives.	This mitigation has been reworded (Table S-2, Section 3.5, Water Resources).
L61	WR	7	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. S-29, Section 3.5, Summary of Mitigation, No Action Alternative: The DEIS states that a program will be developed to ensure that incoming fill does not contain hazardous materials. This program should be developed in consultation with the U.S. Fish and Wildlife Service. Material which meets state standards for use as fill (i.e., meet Model Toxics Control Act standards), can still have adverse impacts on upland and/or aquatic species due to leaching or bio-accumulation. Please reference this comment to all alternatives.	Table S-2 and Section 3.5 have been revised to indicate that fill should not contain hazardous materials or materials that could adversely affect upland and/or aquatic species due to leaching or bioaccumulation.

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L61	WET	3	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. S-32, Section 3.6, Summary of Mitigation, No Action Alternative: "Stormwater treatment facilities would be designed to meet Ecology, local, and/or WSDOT standards . . . " Currently, stormwater facilities, including those designed to meet DOE stormwater manual standards, are inadequate in addressing the needs of listed species in terms of water quality and quantity. The DOE manual does not adequately protect base flow, but primarily focuses on detention. Additional measures are likely to be needed to mitigate for stormwater impacts to provide adequate protection for aquatic species, including bull trout. Please reference this comment to all alternatives.	Impacts to base flow are a major consideration of the water resources impact analysis (Section 3.5 of the I-405 Corridor Program Draft EIS). This analysis identifies several stream basins where base flow may be substantially reduced as a result of projects constructed under the I-405 Corridor Program. Mitigations for addressing flow impacts are presented. If bull trout are determined to reside in or use any of these streams, temperature impacts and mitigation would be equally important. More detailed analysis of water quality and quantity impacts would occur in the environmental documentation developed for the individual projects. Table S-2 and Section 3.6 have been revised to incorporate your comment.
L61	WR	8	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.5-4, Surface Water Quality, first bullet: The DEIS concludes that serious water quality impacts may occur if five or more projects, each disturbing greater than one acre in a basin with a high proportion of steeply sloping areas, are constructed. We request you state the rationale to support this statement. We believe that to use only these criteria for assessing potential construction impacts ignores the potential impacts from potentially fewer but larger projects in a minimally sloping area, especially if they are in proximity to aquatic features. The criteria for determining if surface water quality from construction may be significant should be expanded.	The criteria for five or more projects was based upon professional judgement that multiple projects within a single basin would not only increase the amount of total area temporarily disturbed, but would increase the chances that two or more projects would occur simultaneously within a single basin. Both these factors increase the potential for significant construction impacts to water resources. At this early stage, very few of the individual projects have been defined in sufficient detail to estimate disturbed area during construction. However, if one looks at new impervious area as a surrogate for disturbed area, the average area of new impervious surface for those basins experiencing four or fewer projects, across all alternatives, is 7.3 acres. The average area of new impervious surface for those basins experiencing 5 or more projects, across all alternatives, is 52.4 acres. The criterion used therefore seems reasonable. Specific construction impacts will be examined in more detail during the environmental documentation for the individual projects.

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L61	WR	9	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.5-5, 3.5-6, and 3.5-9, Surface Water: We recommend that a table be provided which includes the sub-basin, its existing impervious surface percentage, future impervious surface by alternative, and future impervious surface associated with cumulative impacts. Additionally, the percent of impervious surface needs to be presented for the entire sub-basin, not solely that which is within the study area.	With the exception of future cumulative impervious area, the requested information was previously calculated and will be available in the addenda being released for the I-405 Corridor Program Draft Surface Water Resources Expertise Report. There is insufficient information on the specific locations of future development to permit an accurate estimate of future impervious area by stream basin. Section 3.23, Cumulative Effects, therefore, discusses future impervious area across the entire study area. All basin impervious area percentages presented in the text are for the entire stream basin. However, the Cedar River Basin impervious area percentage, which is 12 percent, was not included because only a very small fraction of the Cedar Basin (less than 12 percent) lies within the study area. This would not be representative of the suburban residential and downtown Renton land uses, which comprise most of the lower Cedar Basin.
L61	WR	10	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.5-12, Table 3.5-2: The table indicates that base flow impacts are "0" for the no action alternative and Alternative 1, and water quality impacts are "0" for the no action alternative, Alternative 1, and Alternative 3. We respectfully disagree with this assessment. Standard water quality treatment can reduce 80 percent of suspended solids and chemical oxygen demand, and 40 to 60 percent of the metals and nutrients present in road runoff (DEIS pg. 3.5-20). It is apparent that 100 percent treatment of runoff is currently not feasible, and thus additional pollutants may enter aquatic systems. Unless all water is fully treated and infiltrated, impacts to base flow and water quality are likely to occur. We request the FEIS provide a reassessment of the potential impacts to base flow, and water quality due to the proposed alternatives.	There appears to be some misunderstanding of the information presented in Table 3.5-2; "0" does not mean that there are no water quality or base flow impacts from the No Action Alternative and Alternative 1. Instead, it means that the impact analysis demonstrated no long-term substantial impacts to water quality and base flow for any of the stream basins. Water resource impacts will be investigated in more detail during project-specific environmental documentation. Also refer to response to comment L61.WR-1.
L61	WR	11	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.5-24, Mitigation Measures, Surface Water: If coagulants are proposed for use in sediment ponds, please state which ones in the project specific description. Those ones that are least impacting to aquatic organisms should be selected for use. Some coagulants, such as neutral and cationic polyacrylamides, have LC50s low enough to potentially impact certain aquatic organisms, whereas anionic polyacrylamides do not.	The mitigation has been expanded to require the use of nontoxic coagulants, such as anionic polyacrylamide.

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L61	WR	12	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.5-25, Mitigation Measures, Surface Water, second paragraph: If your agency proposes to develop a program which would support both local and regional stream enhancement projects to improve stream water quality and habitat for bull trout, the Department (through the U.S. Fish and Wildlife Service) should be included in the list of agencies with whom you need to coordinate.	The United States Fish and Wildlife Service (USFWS) has been added to the list of agencies with which regional stream enhancement projects would be coordinated.
L61	WR	13	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.5-25, Mitigation Measures, Surface Water, last paragraph: Instead of within-basin mitigation, the DEIS proposes to use a WRIA-wide approach to address hydrologic impacts to more cost-effectively address base flow impacts. We are concerned with the use of a WRIA for addressing hydrologic impacts due to its much larger geographic coverage. Impacts should be addressed at a sub-basin scale due to the localized changes to base flow and the impacts to species associated with that system. Work by May et. al (1997) is based on this smaller scale for assessing impacts. Before out-of-basin mitigation will be considered acceptable for any purpose or alternative, your agency would need to demonstrate that it is more environmentally beneficial and preferable than within-basin mitigation. We suggest that cost alone is not the only factor, which needs to be considered. We suggest this should be clearly stated in the FEIS.	No basin- or Water Resource Inventory Area (WRIA)-level stream mitigation will be proposed unless it meets the criteria stated in the State of Washington Alternative Mitigation Policy Guidance (February 10, 2000), which is reproduced as Appendix H of the I-405 Corridor Program Draft Surface Water Resources Expertise Report. One of those criteria requires that alternative mitigation result in a greater net environmental benefit than would on-site mitigation. (The I-405 Corridor Program DEIS mitigation referred to in the comment has been reworded to include this concept [Section 3.5.5.1, Surface Water, last paragraph in the Alternative 2 (and 3 for Kelsey Creek) subsection].) This same principle is contained in the Draft Washington State Department of Transportation (WSDOT) Proposed Early-Action Environmental Mitigation Decision-Making Process, which has circulated among the resource agencies as part of the I-405 Corridor Program.
L61	WET	4	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.6-2, Wetlands, Methodology: The DEIS distinguishes between "high priority" and "lower priority" wetlands. Lower priority wetlands are stated as having lower value, therefore, protection and mitigation may be less stringent than for other wetlands. Although there is value in identifying "high priority" wetlands, we suggest that avoidance of all wetlands should be the focus during project design. It should not be assumed that a "lower quality" wetland does not have significant value due to is location and function in the landscape. Additionally, under Section 404 of the Clean Water Act, it is assumed that other alternatives to filling wetlands are available for non-water dependent projects, such as roads.	Avoidance of the wetlands is the preferred option, as stated in Section 3.6.5.1. The EIS has been revised to better clarify that both high- and low-quality wetlands will be avoided to the greatest extent practicable.

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L61	WET	5	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.6-9, No Action Alternative, Operational Impacts: The DEIS states that there are existing detention and water quality facilities in the I-405 corridor which would assist in reducing the impacts of the no action alternative. The document does not state if these facilities were sized to include the treatment of the additional stormwater from this project. If not, then these projects would further strain or reduce the ability of these facilities to effectively treat water quality and quantity within the corridor. Additional discussion on the use of these facilities is needed in the FEIS.	Further discussion regarding the capacity of existing water quality and detention facilities has been added to Section 3.6. Also see Section 3.5 (Water).
L61	WILD	2	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.7-7, Table 3.7-1: Impacts to riparian habitat and bald eagle habitat are expressed in terms of linear feet. The Department, (through the U.S. Fish and Wildlife Service) have previously discussed the difficulty in assessing the impacts to the bald eagle based on the information provided. The impacts associated with the loss of riparian habitat are also difficult to assess based on linear feet alone. Although the information provides a relative sense of impacts, there are no other dimensions nor habitat type associated with this data. For example, Alternative 1 has 12,340 linear feet of impacts in riparian areas compared to 20,900 linear feet for Alternative 2, 13, 560 linear feet for Alternative 3, and 11,120 linear feet for Alternative 4. While Alternative 2 appears to result in the greatest impacts to riparian areas, without knowing the width of impact (10 ft? 100 ft?) or the type of habitat (mature forest versus black berry dominated scrub-shrub), a determination on its effects compared to the other alternatives is not possible.	Lineal feet was used as unit of measure for comparison only. An accurate measure of area cannot be made at this programmatic level of analysis. PHS habitat is used as the indicator of bald eagle habitat. Removal of individual trees and timing restrictions cannot be addressed at this programmatic level, but will be addressed during the project-level analysis.
L61	WILD	3	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.7-10, Alternative 3: The document states that one bald eagle nest will experience increased noise disturbance. Please indicate if this disturbance is due to construction activity or operational activity. If it is due to operational activity, there is a higher probability that the bald eagle may abandon the nest due to the long term disturbance. This should be addressed in the FEIS.	Increased noise could result from both construction and operational activity. Given the existing level of similar disturbance in the vicinity of this nest, the disturbance increase will not likely be substantial. The eagles are nesting in an urban environment and have therefore shown habituation to noise. However, abandonment due to construction or operational noise is possible.

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L61	WILD	4	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.7-11, Alternative 3: The DEIS states that Alternative 3 would result in less bald eagle habitat loss than Alternative 1 in the first paragraph. The second paragraph states that Alternative 3 would result in slightly greater impacts to bald eagle territory. These statements appear to be in conflict. Please clarify in the FEIS.	The first statement refers to impacts to suitable bald eagle habitat. The second refers to a specific bald eagle territory. The presence of suitable habitat does not imply that a territory occurs in the area.
L61	WILD	5	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.7-12, Mitigation Measures: Timing restrictions will not protect bald eagle nesting habitat; it will only protect the potential nesting success of this species due to disturbance. The statement should be revised in the FEIS.	The reference to "nesting habitat" has been changed to "nesting success".
L61	FATE	5	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.8-14, Construction Impact Mitigation, first bullet: In-stream work windows for bull trout are also established by the U.S. Fish and Widlife Service, and need to be followed to minimize impacts to this listed species.	The Final EIS has been revised to note that the U.S. Fish and Wildlife Service also establish in-stream work windows for bull trout.

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L61	FATE	6	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.8-15, Impact Avoidance Measures, first bullet: Stream crossings should be made passable for both migrating and resident fish species. Creating migration barriers to resident fish species will not be acceptable under section 7, Endangered Species Act consultation.	At project-level analysis, stream crossings will be assessed to determine if they are passable for resident fish as well as migrating anadromous fish and to detemine appropriate mitigation.
L61	FATE	7	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.8-15, Impact Avoidance Measures: Add the following measure in the FEIS to further minimize impacts - "Avoid the removal of woody riparian vegetation."	The co-lead agencies will make every effort to minimize the removal of woody vegetation but cannot commit to "Avoid the removal of woody riparian vegetation" as an impact avoidance measure.
L61	FATE	8	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.8-15, Compensatory Measures: In addition to retrofitting impervious surfaces with stormwater detention or other facilities, the removal of existing impervious surfaces, and the planting of woody riparian vegetation, especially trees, are other measures,which can help to compensate for increases in impervious surface and should be included in the FEIS.	No opportunities have been identified for compensatory removal of impervious surface elsewhere in the basin, but has been added to the EIS as a potential compensatory mitigation measure.

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L61	FATE	9	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.8-18, City of Bellevue Mitigation Opportunities, sixth bullet: It is unclear what measures would be performed to retrofit riprap and weirs. Please provide additional information on this proposed mitigation measure in the FEIS.	The opportunity is to remove existing riprap, restore stream banks, and remove faulty weirs. This has been clarified in the Final EIS.
L61	CU	2	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3-23, Tables 3.23-3, 4, 5 and 6: Please double check the percent change, including the positive or negative, for each of these tables. For those values which are less than 0.1 percent, please indicate that the percent difference of "0.0" reflects rounding due to significant numbers in the FEIS.	The tables have been corrected and were renumbered to Tables 3.23-3, 3.23-5, 3.23-7, and 3.23-9.
L61	CU	3	Regional Director, US Fish & Wildlife Region 1 911 NE 11th Avenue Portland, OR 97232-4181 Agency: US Dept of the Interior Fish & Wildlife Service	Pg. 3.23-63, Fish Population Trends: There is no discussion on bull trout--only salmon. Please include a discussion of bull trout and other aquatic species which serve as forage for listed fish in the FEIS.	Discussion of bull trout has been added to Section 3.23 of the Final EIS. Because a discussion of the aquatic species that serve as forage fish would not change the outcome of the Fish and Aquatic Habitat analysis at the programmatic level, one has not been added. However, a discussion will be addressed under programmatic Section 7 consultation with the services.
L62	O	1	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	On behalf of the National Marine Fisheries Service (NMFS), I thank you for the opportunity to comment on the draft environmental impact statement (DEIS) for the Interstate 405 Corridor Program. These comments are largely a distillation and compilation of NMFS' prior correspondence and commentary from earlier stages of the I-405 planning process. That prior documentation is incorporated by reference into these comments.	Your comment is acknowledged.

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L62	O	2	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	As a preliminary matter, NMFS has been named as a "Cooperating Agency" in the DEIS. We are uncertain whether this status is accorded to each of the Reinventing NEPA agreement signatories, through the agreement. If not, we do not agree that our status as a participant in the I-405 Pilot project renders NMFS a "cooperating agency" under NEPA.	Please see the revisions in response to your comment on page "d" of the Final EIS.
L62	O	3	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	NMFS has participated in the "Reinventing NEPA" process, and appreciates the effort that your agency has made to include Alternative 1, which creates the least impervious surface and has the fewest riparian crossings and encroachments of any action alternative. As you are aware, NMFS participation in the Reinventing NEPA process and submission of these comments do not substitute for NMFS' obligations under the Endangered Species Act and other laws. These comments are not necessarily intended to reflect NMFS' views on the adequacy of the project under ESA standards, which has yet to be determined. However, the scoping of the DEIS for the I-405 Pilot as a programmatic environmental review preceding the vast majority of project-level design information begs for a complementary programmatic treatment under the ESA, for which the DEIS could not be viewed as providing sufficient initial information. NMFS recommendation that FHWA pursue programmatic Interagency Consultation under the ESA as a threshold matter is the subject of a separate correspondence.	Your comment is acknowledged.
L62	FATE	1	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	As stated above, the DEIS does not present enough information for NMFS support any of the action alternatives. Indeed, given WSDOT's determination to proceed with a corridor-wide decision in the absence of specific design and mitigation data, NMFS struggles to provide meaningful input on the likely impacts to ESA-listed fish. NMFS is concerned that the corridor-wide strategy will result in a choice of preferred alternative in the absence of complete information. NMFS believes that further information will have to be developed on impacts and mitigation prior to moving ahead under any of the alternatives.	The co-lead agencies have had to balance the ideal of fully detailed baseline description and impact assessment with the reality of a vast study area with hundreds of streams, hundreds of construction projects, and numerous jurisdictions. The analysis effort has focused on allowing comparisons among alternatives based on criteria that are quantifiable and mappable at this early programmatic level, and yet will represent the potential level of impacts to fish habitat and populations.

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L62	FATE	2	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	Chapter 3.8 on fish and aquatic habitat does not specifically identify effects to ESA- listed species. While the DEIS does provide useful summary information comparing aggregate environmental changes that would likely occur under the alternatives (e.g. added impervious surface from new roadway, number of streamcrossings, number of places where construction will occur within 300 feet of streams, etc), the DEIS does nothing to relate these environmental changes to functional effects on fish. A comparative discussion of these relationships is a fundamental omission in the DEIS; one that contributes to NMFS' inability to discern the effects of the proposed action on salmonids, listed and non-listed.	Additional discussion of the relationship between impervious surfaces, riparian encroachments, and functional effects on fish has been added to the Final EIS.
L62	FATE	3	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	The cumulative effects section on fish, section 3.23.4.5, finds that fish populations, presumably including ESA-listed stocks, are likely to continue to decline under any alternative. NMFS does not necessarily agree with this conclusion. Assuming no changes from past methods and patterns of land0use and other practices affecting freshwater salmonid habitat (among other things), the DEIS assertion might be true. However, this sweeping conclusion ignores the changes in practices that have emerged in Washington State, especially since the ESA-listing of certain salmonid ESUs in the late 1990s. This conclusion is especially troubling in the context of the I-405 Pilot given the role that large scale transportation planning could play in addressing myriad environmental issues including salmonid conservation.	The co-lead agencies seek to support the NMFS goal of restoring listed species during the choice of programmatic alternatives as well as the design, permitting, construction, and operation of the individual projects. We are enthusiastic about the potential for coordinating I-405 environmental mitigation with existing efforts such as the Tribal programs and the WRIA steering committee studies in order to advance regional habitat restoration efforts. However, it must be noted that population and employment increases have created the need for transportation improvements, and that the I-405 Corridor Program improvements will not change the overall trend that has brought salmonid stocks to their threatened status. Outside of the I-405 Corridor Program, there are efforts underway to change the negative trend.
L62	FATE	4	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	NMFS is aware that WSDOT is developing a program-level approach to applying mitigation on a separate track from the I-405 Pilot. The decision-making process contemplated by that program can and should be integral to addressing the contribution of the myriad I-405 corridor expansion projects to the generally identified cumulative effects. Unfortunately, timing of the DEIS publication prevented any consideration of the Environmental Early Action decision making process as an overlay on any of the alternatives, to the detriment of the DEIS.	WSDOT's environmental early-action strategy will be applied equally to whatever program alternative is advanced out of the I-405 Corridor Program Final EIS, and will have even more influence at the project-level implementation. Therefore, comparison of the program alternatives' potential impacts before applying the overall mitigation strategy still allows a valid comparison.

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L62	FATE	5	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	NMFS also believes that the DEIS summary conclusion of cumulative effects on listed salmonids ignores WSDOT's legal duties to contribute to the conservation of these ESUs. When assessing the effects of any project on the freshwater habitat of listed salmonids, NMFS subscribes to the considerations stated in The Habitat Approach (NMFS) 1999). This paper was written to provide guidance for those conducting interagency consultation under section 7(a)(2) the ESA, but the paper presents a useful framework for assessment of effects under any section of the ESA. In assessing proposed habitat modifying activities under the ESA, NMFS must ensure or be assured that the proposed actions will not jeopardize the continued existence of the ESU. The jeopardy standard is complemented by a similar requirement that actions not adversely modify or destroy critical habitat. Under either of these standards, impeding a species' progress toward recovery exposes it to additional risk, reducing the likelihood of survival. Incremental loss of habitat function is a primary issue for NMFS in the conservation of ESA-listed species and the habitat and ecological functions upon which those species depend. To accomplish this ESA-conservation, actions must specifically address their effects on functional habitat conditions.	The I-405 Corridor Program may support the implementation of existing recovery efforts. FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for consultation on a programmatic level. In-depth consultation may be required at the project level. WSDOT has also prepared a Draft Proposed Early-Action Environmental Impact Mitigation Decision-Making Process document. This document coordinates specific programmatic basin-level mitigation with WRIA 8's forthcoming "Near Term Action Agenda" for basin-level mitigation. The Final EIS and programmatic consultation adequately address all ESA listed species found in the project area in a manner consistent with a programmatic analysis, thus meeting the legal obligation to protect local ESUs. Please also see response to L62.FATE-3.
L62	FATE	6	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	The DEIS makes brief reference to the Matrix of Pathways and Indicators (MPI). Since the MPI was devised to assist in making effects determinations at large scales (basins and watersheds), its use in the programmatic environmental review of the I-405 alternatives might provide useful insight into the likely effects of the proposed program on functional habitat condition. Instead, the MPI in the DEIS is juxtaposed with reliance on compliance with state and local regulations to ensure that effects would be minimal. NMFS has neither conducted nor participated in the review of any of these regulations. The MPI includes many criteria that are not considered in state and local regulations. Where the criteria do overlap, differences between the different approaches may show substantial effects on habitat conditions and ecological functions. Therefore, the DEIS lacks a basis for this conclusion regarding effects on salmonid habitat.	Although the MPI offers an excellent framework for basin-level analysis, this level of detail is being deferred to the ESA documents at the project level. The EIS is not an ESA document, and an MPI-format description and assessment at this programmatic phase would go considerably beyond what is necessary for comparison of alternatives and disclosure of significant impacts. The methodology used is considered adequate. MPI could be used in the Section 7 ESA analysis at the project-level phase, where functions and site-specific conditions are critical.

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L62	O	4	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	NMFS could concur with an action alternative that makes an affirmative contribution to the conservation of listed salmonids through minimizing the effects of projects on properly functioning habitat conditions and avoiding further degradation of habitat that is functioning poorly or not at all. Unfortunately, as NMFS stated in its October 24, 2000 letter to mike Cummings regarding the Second Concurrence Point, the scope of the proposed alternatives in the DEIS remains insufficient to adequately address under ESA Section 7, the adverse effects of I-405 corridor expansion on ESA-listed Puget Sound chinook.	Please refer to the responses to your comments L62.FATE-1 and L62.FATE-5.
L62	WR	1	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	The DEIS provides an inconsistent discussion about how WSDOT will manage stormwater. The Washington Department of Ecology (Ecology) recently published the Stormwater Management Manual (Manual) for Western Washington. NMFS participated in a detailed review of the Manual and found that this document contributes substantially to the best available science regarding stormwater management, and improves management over past practices. Use of the new Manual to guide approaches to minimizing the effects of stormwater on ESA-listed species should result in improved species and habitual protection over past approaches. However, NMFS was not able to find that the Manual completely meets the needs of listed salmonids in terms of stormwater effects. The efficacy of the Manual is limited in this regard by the fact that it makes no effort to contemplate the land-use based causes of stormwater effects on salmonids and their habitat. This shortcoming is exacerbated by the fact that because of criteria limiting applicability, the Manual does not address cumulative effects.	With regard to cumulative effects, the surface water mitigation measures do address the cumulative I-405 Corridor Program impacts upon hydrology. The cumulative impact of multiple projects upon impervious area within each subbasin and the resultant potential for reduction in dry season base flow cited in Section 3.5.4, are specifically addressed in the I-405 Corridor Program DEIS. Impacts to ESA species has been discussed in Section 3.8 and will be further addressed through programmatic consultation.
L62	WR	2	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	The shortcomings in the Manual are compounded in the DEIS treatment of stormwater. Specifically, the DEIS contemplates addressing stormwater concerns consistent with Ecology's Manual, but not in every instance. This consistency with Ecology's standards in some places but not others is not explained. This lack of certainty as to stormwater management practices further diminishes the DEIS' descriptions of remaining effects to ESA-listed species, and additional	Inconsistences in the EIS were not intended. Although there may be alternatives to Ecology's manual, it is the most current, consistent methodology throughout the study area and is being used as the best current standard to protect water resources. Stormwater will be controlled and treated according to the most current version of the Ecology Stormwater Management Manual for Western Washington or functionally equivalent guidance.

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				measures necessary for the conservation of ESA-listed species. For example, on page 3.8-15, the DEIS states: -- Stormwater runoff quantity: Detaining runoff from new impervious surfaces in accordance with Ecology's current stormwater drainage manual, and infiltrate to groundwater where feasible. -- Stormwater runoff quality: Treating collected stormwater runoff from new impervious surface using sedimentation ponds, filter systems, wetponds, vegetated swales, filtering devices, etc.	
L62	WR	3	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	Page 3.8-15 compounds the inconsistency stating "[s]tormwater retrofitting would, at a minimum, implement WSDOT's current drainage policy to control stormwater runoff from 140 percent of the new impervious surface." The 140 percent standard remains the centerpiece of WSDOT's interim instructional letter only because WSDOT refused to adopt stronger approaches for the two to three year period WSDOT insisted would be required to design-in stronger, more appropriately protective standards of stormwater management. NMFS notes that when WSDOT inquired about a standard for interim stormwater management pending the revision of WSDOT's Highway Runoff Manual, NMFS suggested WSDOT track the standards that were being proposed through the Ecology Manual. The 140 percent treatment approach provides less protection of the habitat conditions and ecological functions necessary for ESA-listed species than the 2001 Ecology Stormwater Management Manual for Western Washington.	The 140 percent standard is no longer applicable, and will be deleted from the Final EIS text. Stormwater will be controlled and treated according to the most current version of the Ecology Stormwater Management Manual for Western Washington or functionally equivalent guidance.
L62	WR	4	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	Section 3.5 addresses water resources, and provides yet another approach to managing stormwater. The impact analysis assumes that as part of each project, the standard erosion and sediment control measures and permanent stormwater detention and treatment requirements specified in the *Stormwater Management Manual for Western Washington* (Ecology, 2000) would be implemented. When this manual is finalized, the specific requirements in that manual would be applicable. Then WSDOT would have one to two years to revise its *Highway Runoff Manual* to meet the requirements in the Ecology manual.	Please refer to the response to comment L62.WR-2.

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				NMFS welcomes WSDOT's recognition that "beyond this (stormwater detention and treatment), considerably more could be done in compensation for specific project impacts, because I-405 was constructed at a time of less stringent stormwater control standards and much of the stormwater runoff was not detained or treated" (DEIS page 3.8-15). However, the DEIS does not provide enough information about the effects to ESA-listed species that occur after BMPs are employed, and what additional conservation measures are necessary such that the action contributes to the conservation of listed species. As the Ecology Manual states, BMPs alone are not sufficient to prevent adverse effects and restore beneficial uses of waterways.	The text you cite was meant to suggest a mitigation possibility of "stormwater retrofitting" whereby stormwater from existing impervious surfaces that currently do not capture stormwater would be collected and treated. We acknowledge that BMPs can not generally prevent all impact, only reduce it substantially. Additional measures to prevent impact and restore beneficial uses will be developed in WSDOT's Early-Action Environmental Impact Mitigation Decision-Making Process, as well as during project-specific permitting.
L62	FATE	7	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	Avoidance of environmental affects as a threshold matter comports with the Services' policy on mitigation. In fact, avoidance of effects obviates the need for mitigation in the first place. Therefore, NMFS would support an alternative in which every opportunity to avoid effects on salmonids and salmonid habitat is exercised. Recognizing that specific circumstances within the I-405 corridor will render certain types of environmental effects unavoidable, NMFS would support a mitigation decision making process triggered by a narrow definition of "unavoidable" environmental effects. As stated above, NMFS uses the functional condition of habitat to assess the effects of projects on ESA listed salmonids. Therefore, the propriety of any mitigation decision making scheme depends on whether or not the scheme prioritizes the protection of properly functioning habitat conditions or eventually enables the attainment and maintenance of properly functioning conditions for habitat that is degraded or not properly functioning. These conditions must exist spatially and temporally such that the survival and recovery of the ESA listed species is ensured. Within the DEIS study area, indicators of habitat functional condition are generally functioning at risk or not properly functioning. Therefore, an ESA driven approach to planning mitigation for the expansion of the I-405 Corridor should address the effects of any underlying proposal on those indicators. Mitigation activities would be used close ro where projects' effects occur, e.g., on-site and in-kind mitigation is preferred and should be used for the vast majority	WSDOT's Early Action Environmental Impact Mitigation Decision-Making Process is currently being developed. In addition to establishing a decision-making process, it also addresses impact avoidance and minimization. On-site, in-kind mitigation for each project is expected to be required by regulations including the Washington Hydraulic Code and local agency critical area ordinances. Watershed- or basin-level mitigation would typically be in addition to on-site, in-kind mitigation. NMFS has been invited to work with the co-lead agencies on the early-action mitigation strategy.

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				of unavoidable effects. NMFS also recognizes that mitigation activities may be accorded at the sub-basin and watershed level as well, but cautions that in the context of salmonid conservation, larger scale approaches are most appropriate for pervasive, large-scale issues that manifest on a cumulative basis as changes in total impervious area and non-localized degradation of water quality. Nevertheless, the actual location and type of mitigation activities should link with the location and extent of lost function, and then, only when those losses are truly unavoidable.	
L62	FATE	8	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	Compensatory mitigation, specifically in the form of actions that do not address degraded or lost functions where project effects occur (i.e., off-site, out of kind) is undesirable and may be ineffective in the context of salmonid conservation. As a threshold matter, salmonids depend on extant properly functioning habitat to support their life history as they are expressed throughout their freshwater range. This means that when a project affects the functional condition of habitat in a stream, the survival and recovery of salmonids are impeded unless those affects are dealt with in the stream reach where they occur. Stated another way, it is very difficult to show that degraded habitat in one stream can be offset by restoring or protecting those or other functions somewhere else. Reliance on the use of offsite or out-of-kind mitigation (or both) to offset adverse project impacts to ESA listed species and their habitat, therefore, is speculative.	The co-lead agencies recognize the speculative nature of off-site and out-of-kind mitigation for various kinds of project impacts, including any adverse impacts to ESA-listed species and their habitats. Therefore, WSDOT will (and other agencies are encouraged to) follow the "Compensatory Mitigation Requirements" specified on page 10 of the Alternative Mitigation Policy Guidance Agreement being implemented by WSDOT, Ecology, and WDFW. According to that agreement, on-site and/or in-kind mitigation is required in various specified situations when the greatest ecological benefits can be obtained therefrom. Off-site, out-of-kind mitigation can result in meeting the goal of long term preservation of the species by protecting higher-quality habitat in higher-quality watersheds instead of trying to mitigate within a degraded watershed in which mitigation might have no positive net effect.
L62	FATE	9	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	As to onsite, in-kind mitigation, the DEIS does not identify or discuss any accounting method. Ratios have not been identified or discussed. Again, the utility of mitigation, especially compensatory mitigation, is questionable to the point of rendering any such discussion unripe. However, NMFS would suggest that since the use of mitigation to address unavoidable effects is inevitable, that an accounting be developed that considers existing functional condition, the extent of effects, and the likelihood of success of the proposed mitigation. WSDOT should also devise a strategy and rationale for the duration of mitigation activities (e.g. if mitigation involves improving riparian buffers, NMFS would want to know for how long and by what means the riparian buffers would remain in place). In many instances, proposed mitigation would have to be permanent to offset impacted functions important to the conservation of ESA listed species.	Recognizing that your comment was written prior to the WSDOT/FHWA/NMFS January 7th, 2002, meeting regarding mitigation and Section 7 consultation, NMFS has been invited to review and comment on the early action mitigation process. Ratio requirements that are required by federal, state, and local regulations will be met.

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L62	FATE	10	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	On page 3.8-12, the DEIS states that, "… some regulatory agencies believe that on-site mitigation may be less effective in a highly urbanized area where pre-existing watershed conditions prevent restoration of good quality salmonid habitat. In these areas, they suggest that off-site and/or out-of kind mitigation elsewhere in the sub-basin or watershed would be a more effective and efficient use of mitigation to protect resources." This statement provides a convenient rationale for avoiding a full discussion of conservation approaches in the context of the I-405 corridor expansion. However, NMFS does not have the luxury under the ESA to gloss over appropriate responses to project effects on listed salmonids merely because such approaches might be harder or more expensive to implement. Indeed without full disclosure regarding the source and basis for that statement, it remains little more than an unsubstantiated assertion calculated merely at shaping public perceptions regarding mitigation without adding value to the environmental review. NMFS believes that it might be difficult if not impossible for WSDOT to demonstrate that, even as a strategic matter, it can appropriately conserve listed salmonids through off-site and out of kind mitigation.	The statement is not meant to shape public perception or to enable avoidance of on-site, in-kind mitigation. It is merely to inform the reader that some agency staff, notably King County Department of Development and Environmental Services, have expressed opinions that the co-lead agencies should seek out and implement basin-level mitigation. The co-lead agencies expect on-site, in-kind mitigation for each project to be required by regulations including the Washington Hydraulic Code and local agency critical area ordinances. Watershed- or basin-level mitigation would typically be in addition to on-site, in-kind mitigation. In fact it is not clear what specific legal framework exists to conduct such off-site, out-of-kind mitigation or how it could be credited toward required mitigation. WSDOT's Early Action Environmental Impact Mitigation Decision-Making Process and its "Alternative Mitigation Policy Guidance for Aquatic Permitting Requirements from the Departments of Ecology and Fish and Wildlife" provide direction on this issue.
L62	FATE	11	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	The DEIS lists potential mitigation/restoration projects on pages 3.8-15 to 3.8-20. Some of these actions might fit within the definition of an authentic restoration project and would therefore contribute to the conservation of salmonids if proposed to address specific effects of related projects (replanting riparian areas, day-lighting streams, retrofitting hardened streambanks with "softer" technologies, upgrading high-flow bypass facilities, among others). Projects like these could work within the context of larger-scale mitigation planning if they are linked to lost function within watersheds that might not otherwise be realized. On the other hand, projects that merely address some symptoms of functional degradation have little value and should not be recognized as restoration. That is because such projects do nothing to restore watershed functions and fish habitat (for example, establishing stormwater detention standards, wetland creation, retrofitting of rock weirs, installation of sediment vaults, dredging of sediment at Lake Washington stream mouths).	The discussion of potential mitigation efforts included a variety of proposed or ongoing efforts that the I-405 mitigation could complement or build upon, and mitigation needs identified by local jurisdictions. Mitigation planners definitely need to be aware of these issues in order to avoid either duplicating or thwarting others' mitigation efforts. The co-lead agencies agree with the comment, that the potential mitigation efforts will need to be evaluated based on whether they address project impacts, and not all will be considered worthwhile.

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L62	WR	5	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	Watershed-level mitigation of stormwater problems should include non-structural stormwater treatments. NMFS encourages WSDOT and the local governments that will participate in projects comprising the I-405 corridor expansion to look for opportunities to increase the "perviousness" of a watershed by reducing existing impervious surface where doing so would contribute to improved hydrological function. Additionally, the development and maintenance of continuous riparian buffers would contribute to offsetting stormwater impacts.	Increasing the amount of pervious area within a stream basin can be an effective off-site measure for mitigating many of the hydrologic impacts of the I-405 Corridor Program. This approach can offset both the peak flow and base flow effects of new road surfaces. This mitigation has been added to Section 3.5.5.1 of the I-405 Corridor Program Final EIS.
L62	FATE	12	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	Preservation of areas already displaying properly functioning conditions could be perhaps credited as mitigation but only under very limited scenarios. As stated above, salmonids require properly functioning habitat conditions, spatially distributed throughout watersheds: preserving isolated areas of watershed (for example, rural areas or areas high in basins) while doing nothing in the middle and lower basins, does not necessarily provide functions needed for survival and recovery.	The co-lead agencies expect on-site, in-kind mitigation for each project to be required by regulations including the Washington Hydraulic Code and local agency critical area ordinances. It is not clear what specific framework exists to conduct such off-site, out-of-kind mitigation, or how it could be credited toward required mitigation. Co-lead agencies would explore opportunities to tailor mitigation so that it achieves the best environmental benefit. WSDOT's Early Action Environmental Impact Mitigation Decision-Making Process and its "Alternative Mitigation Policy Guidance for Aquatic Permitting Requirements from the Departments of Ecology and Fish and Wildlife" provide direction on this issue.
L62	O	5	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	In addition to addressing the scientific and technical concerns raised in this and previous comments from NMFS, we need to see the mechanism to ensure certainty of implementation. WSDOT often lacks the authority to act or spend money outside a narrowly defined project area. To the extent that conservation measures may occur off-site, the mechanisms to ensure implementation, including: evaluation, monitoring, and adaptive management, is essential to success. Leaving aside questions about the adequacy of the mitigation in light of uncertain and ill-defined impacts, NMFS is concerned that project implementation will move ahead in the absence of assurances that mitigation will actually occur.	WSDOT has authority under the eighteenth amendment to the state constitution and RCW 47.12.330 to implement concurrent or advance mitigation (including evaluation, monitoring, and adaptive management) even outside of a project area provided it can demonstrate that the mitigation is directly related to projects approved by the transportation commission as part of the state's six-year plan or included in the state highway system plan. The agency also intends to use early-action mitigation to mitigate many of the unavoidable impacts of the I-405 corridor program on water resources, wetlands, floodplains, aquatic species and habitat, and protected upland species and habitat, so it can ensure successful implementation before those impacts occur. In addition, WSDOT intends to comply with any permits obtained for the project, which should identify any credits available from advance mitigation (and may require additional mitigation). The agency has an exemplary track record in implementing mitigation.

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L62	CU	1	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	The DEIS apparently ignores the indirect effects guidance developed jointly with NMFS and other agencies and finalized in May 2001. While the guidance was intended to help Biological Assessment authors determine when to pursue and develop a full indirect effects analysis in the context of interagency consultation under ESA section 7(a)(2), that product should be considered instructive in any environmental review that contemplates addressing issues under the ESA. Unfortunately, the guidance receives no mention in the DEIS. In fact, consideration of indirect effects such as induced development and growth is a major flaw in the DEIS, which largely defers that consideration until after an alternative is chosen. NMFS does not agree that there are few differences between the alternatives with regard to indirect effects, as the DEIS states. It is very likely that different alternatives will have substantially different outcomes in terms of development and growth patters in the region. These outcomes could mean very different things for fish conservation. The DEIS fails to consider these impacts. The Trans-Lake pilot is taking a very aggressive and innovative approach to exploring the relationship between transportation planning and growth. While the Trans-Lake approach has yet to take the step of relating the effects of new development on salmonids and their habitat, there is nothing in the I-405 DEIS which comes close to that effort.	Please refer to the response to comment L51.O-5. Indirect effects to ESA-listed species will be addressed under programmatic Section 7 consultation with the services.
L62	CU	2	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	Cumulative effects are also important, and require additional analysis and consideration. NMFS supports the intent of the Tri-County ESA Response Effort, and has participated actively since that process started. Successful planning through Tri-County could address the cumulative effects of development in the Study Area. Success, however, cannot be assumed or ignored. NMFS must consider effects to ESA-listed chinook in the event that an agreement is reached in the near term or in the long term.	WSDOT will continue to work with NMFS on ESA issues.
L62	FATE	13	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	Numerous tools are available to guide efforts to protect and restore those habitat conditions and ecological functions necessary to conserve ESA-listed fish. NMFS has endorsed revisions to Part IV of the Shoreline Management Act as ESA-compliant, yet the DEIS makes no mention of this tool. State agencies are developing Aquatic Habitat Guidelines that provide additional information about effects to shorelines and ways to minimize effects or improve environmental	The Draft EIS discussion of baseline conditions is a condensed summary of the analysis presented in the Draft Fish and Aquatic Habitat Technical Expertise Report, which referenced the WRIA 8 and 9 documents as well as numerous sources from local jurisdictions including the limiting factors report and others. Additional discussion has been brought into the Final EIS, and the relevant parts of the Shoreline Management Act are discussed.

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				conditions. King County and others recently published the Salmon and Steelhead Limiting Factors Report for the Lake Washington Watershed (WRIA 8). The DEIS makes only a slight reference to an earlier draft. King County and others published a comparable Report for the Green-Duwamish River (WRIA 9) that also received little discussion in the DEIS. While NMFS does not endorse these Reports as habitat recover plans, they contribute to the pool of the best commercial and scientific data available regarding ESA-listed species. Additional information on the environmental baseline is available in the subbasin plans that King County and other jurisdictions have prepared. Several programs at the University of Washington have conducted reviews of subbasins within the I-405 Corridor Program Study Area. State agencies and tribes have information on stream flows, fish distribution, habitat and instream conditions, and other relevant factors.	
L62	O	6	Steven Landino 510 Desmond Drive SE/Suite 103 Lacey, WA 98503 Agency: NMFS	NMFS looks forward to working productively with WSDOT to resolve outstanding issues regarding ESA-listed chinook and identify a preferred alternative. NMFS is willing to make decisions in a timely way provided those decisions are based on the best available science and contribute to the conservation of ESA-listed species.	Your comment is acknowledged.

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L63	ALT	1	see the following pages for a list of names	Your help is needed... Join Move on 405 Yes, it's time to Move on 405 and approve a plan that relieves congestion and improves mobility along the I-405 corridor. Please sign me up as a supporter of Alternative 3, the Preliminary Preferred Alternative, and keep me updated on the I-405 improvement process. Please relay my endorsement of the Preliminary Preferred Alternative to the I-405 Corridor Executive Committee. What is Move on 405? Move on 405 was formed by concerned citizens whose daily lives are impacted by congestion along the I-405 corridor. We are supportive of the efforts of the Washington State Department of Transportation to involve citizens and elected leaders over the last two years to improve the transportation system of our region. We intend to ensure public awareness of this process and encourage citizen involvement in the selection and implementation of a final solution package which will reduce congestion and improve mobility along the 1-405 corridor. -Roger Harbin, Chair, Move on 405	There is no preliminary preferred alternative in the I-405 Corridor Program Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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Code Number			Name	Comment	Response
E1	SOL	1	Christopher J. Centerccenter@metronsys.comFall City, WAAgency: Public	Additional lanes are costly to build, costly to maintain (both road repair and accidents) and indicate a short-sighted future. I would strongly recommend that the light-rail system be installed where the long term solition is to add more trains to the track.	Thank you for your comment.
E2	SOL	1	John Reinke 9350 Red-Wood Rd #B212 Redmond, Washington 98052 jmreinke@pioneernet.net Agency: Public	We simply cannot afford to spend 18 years and 8 billion dollars to replicate the current gridlock, as you are proposing to do. Instead, I urge you to analyze Alternative 5 which has been proposed by Sensible Solutions for 405. This alternative will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E3	COST	1	Brad Davis Brad@ArtSource.com Agency: Public	My vote is for Alternative 1 (high capacity transit). Constructing new lanes on I-405 is not cost effective. Making a sound investment in high capacity rapid transit is cost effective and will sooner than later pay for itself. In particular automated monorail, Maglev or similar technology.	Thank you for your comment.
E3	TR	1	Brad Davis Brad@ArtSource.com Agency: Public	My vote is for Alternative 1 (high capacity transit). Constructing new lanes on I-405 is not cost effective. Making a sound investment in high capacity rapid transit is cost effective and will sooner than later pay for itself. In particular automated monorail, Maglev or similar technology.	Alternative 3 (a mixed mode approach) showed the highest benefit-cost results. Alternative 1 provided the fewest benefits per unit cost. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
E4	COST	1	Daniel LaVassar 3430 26th Ave West #123 Seattle, WA 98199 dlvassar@aa.net Agency: Public	I would like to express my support for Alternative Two. Simply adding lane capacity is not a long term solution to the problems facing the Eastside. We need high capacity transit operating on a grade separated guideway. Specifically, I would like to see an elevated, automated system. A Skytrain system like the one in Vancouver BC or a more traditional monorail would provide all the capacity of light rail at a fraction of the cost. Looking at the Executive Summary, the costs listed for the HCT component of the project are stated to be a little over $130 million dollars a mile. This seems incredibly expensive when compared with a monorail! Much of I-405 has a wide median, and a guideway could be constructed for around $25-40 million a mile. A monorail would also only take up a few feet of right-of-way, allowing for expansion of general purpose lanes and HCT within existing medians, also reducing cost.	The high-capacity transit element included in the alternatives did not specify technology. Cost estimates were developed for a fixed-guideway system that included tracks, stations, maintenance facilities, and all amenities required for a fully operational system. Estimates were based on typical system costs that would fall in the high end for light rail technology, medium range for monorail or an automated guideway system, and low range for heavy rail. Addition of both an elevated HCT system and more traffic lanes within the I-405 footprint would require additional right-of-way for columns, stations, and connection points. Costs released in January 2002 for the 14-mile monorail from Ballard to West Seattle were estimated between $970 million and $1.735 billion to build, according to the Elevated Transportation Company ($70-125 million per mile).
E4	TR	1	Daniel LaVassar 3430 26th Ave West #123 Seattle, WA 98199 dlvassar@aa.net Agency: Public	I would like to express my support for Alternative Two. Simply adding lane capacity is not a long term solution to the problems facing the Eastside. We need high capacity transit operating on a grade separated guideway. Specifically, I would like to see an elevated, automated system. A Skytrain system like the one in Vancouver BC or a more traditional monorail would provide all the capacity of light rail at a fraction of the cost. Looking at the Executive Summary, the costs listed for the HCT component of the project are stated to be a little over $130 million dollars a mile. This seems incredibly expensive when compared with a monorail! Much of I-405 has a wide median, and a guideway could be constructed for around $25-40 million a mile. A monorail would also only take up a few feet of right-of-way, allowing for expansion of general purpose lanes and HCT within existing medians, also reducing cost.	Thank you for your comments regarding support of Alternative 2.
E4	TR	2	Daniel LaVassar 3430 26th Ave West #123 Seattle, WA 98199 dlvassar@aa.net Agency: Public	I would strongly argue against the Bus Rapid Transit proposal. HOV lane speeds are dropping, and in my personal observation are operating at speeds not much above the oft-crawling mainline. I also do not see how BRT could possibly be expected to help congestion at all. Commuters are not going to be enticed to switch travel modes by shaving a few minutes off a bus trip. Even if they were, there is a finite limit to how many buses can use one HOV lane, especially if it is clogged with carpoolers. We need HCT.	The design of a BRT system would include provisions to ensure reliably swift travel on the HOV lanes. The HOV lane was also assumed to be changed to a 3+ carpool rule by 2020 to reduce volumes in the lane. The average travel speeds for transit on HOV lanes is typically in the 45-55 mph range, while most rail systems average around 50 mph, not including stops. A well designed BRT system can provide very competitive travel times to comparable rail systems.

Code Number			Name	Comment	Response
E4	TR	3	Daniel LaVassar 3430 26th Ave West #123 Seattle, WA 98199 dlvassar@aa.net Agency: Public	I suggest you develop a plan to build an elevated guideway from Alderwood Mall and the Swamp Creek P&R to Southcenter and Sea-Tac. This would be lower cost than building a light rail line, and more quickly constructed.	Alternatives 1 and 2 include a fixed-guideway rail system through the corridor. This system could be evaluated. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E4	O	1	Daniel LaVassar 3430 26th Ave West #123 Seattle, WA 98199 dlvassar@aa.net Agency: Public	I do not see the need to hand this project off to Sound Transit either. The state should solicit bids from Hitachi and Bombardier to design, build and operate the system. An automated system will pay for itself with farebox revenue over a few decades, and then the system could be turned over to ST or successor agency.	Thank you for your comment.
E5	ALT	1	Lars Henrikson 2142 N 87th ST Seattle, WA 98103 LHHenrikson@aol.com Agency: Public	Having looked at your four alternatives for improving I 405 I can see that there is one that stands head and shoulders above the rest. Option 2 (two) is the only one that integrates several modes of travel and gives options that will stand the region in good stead into the future.	Each of the alternatives combines investments in different modes. The Preferred Alternative is similar to Alternative 3, which is also a multimodal solution.
E5	TR	1	Lars Henrikson 2142 N 87th ST Seattle, WA 98103 LHHenrikson@aol.com Agency: Public	There is no reason to expect that if we just build more of the same as would be the case with options 3 and 4 that the resulting future traffic would be any different from today's other than in increased quantity. Option 1 is good too, but it discounts the need to improve HOV lanes on feeders to I405.	Please see the response to comment E66.SOL-1 related to induced travel.
E5	TR	2	Lars Henrikson 2142 N 87th ST Seattle, WA 98103 LHHenrikson@aol.com Agency: Public	One CRITICAL concern that I have is that when you look at high capacity transit you look beyond "Light Rail." Seattle has been looking into monorails and found that costs are far below light rail, Vancouver's Skytrain is quite popular and recent expansions are coming in well under budget. If you only look at Light rail for your transit alternative you will be short changing the region and opening yourselves up to lawsuits and bad press. Don't fall into Sound Transit's mire.	In the DEIS Alternatives 1 and 2 assumed that HCT service along the I-405 corridor would be provided by a physically-separated fixed-guideway system, without committing to a specific technology. For your information, the Elevated Transportation Company recently published estimated monorail construction costs in the City of Seattle. These costs ranged from $69 to $124 million per mile for a 14-mile elevated system. These costs were similar to the fixed-guideway transit system costs evaluated in Alternatives 1 and 2 in

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					the Draft EIS. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E6	SOL	1	William C.S. Affleck-Asch 3648 Francis Ave N, #B Seattle WA 98103-9323 affleckasch.w@ghc.org Agency: Public	I notice, while looking at the presented alternatives that there is no suggestion of a freeway monorail along this route. Or an expanded bike lane. In fact, you could easily build a freeway monorail and even use any guideway for this for a bike lane at the same time (monorail up about 10 feet, bike lane underneath, sound wall on one side). Then you could: 1. provide inexpensive fast commuter service 2. provide a much needed bike lane for commuters and residents 3. provide sound baffling (also a plus) One hopes you'll include this option in further planning. Hate to see all that money go to waste on roadway that will just gridlock, or expensive transit when inexpensive is more highly suited. You could always replace any monorail/bike lane with a light rail lane later on, at minimal cost, with minor station retrofits. And, bonus part, you could build it quickly.	Alternatives 1 and 2 include a fixed-guideway transit system, which would likely be rail. We have not specified the technology, but the assumptions used in the study are consistent with monorail or similar guideway systems. The system evaluated operated largely along the BNSF railroad alignment and portions of the I-405 right of-way. The potential would exist for bicycle facilities adjacent to or underneath such a system. Such a design would not necessarily be easy or inexpensive given the physical constraints in the I-405 Corridor. For your information, the Elevated Transportation Company recently published estimated monorail construction costs in the City of Seattle. These costs ranged from $69 to $124 million per mile for a 14-mile elevated system. These costs were similar to the fixed-guideway transit system costs evaluated in Alternatives 1 and 2 in the Draft EIS. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E7	O	1	Matt Hays Seattle matth@lcl.com Agency: Public	It's helpful to understand your bias about I-405. Today's DJC article was very instructive. WSDOT can and should stand up for facts. But this arguement was mostly about philosophy. Citizens have every right to discuss the pros and cons of conceptual plans, at whatever junctures they choose.	Thank you for your comment concerning public dialogue.

Code Number			Name	Comment	Response
E7	LU	1	Matt Hays Seattle matth@lcl.com Agency: Public	FYI, my own bias is to not expand SOV capacity. If traffic is a problem for people, let this influence their location decisions. For example, I decided to live near work.	Your comment is acknowledged.
E8	TR	1	George L. Hadley 1401 SW 172nd Street Normandy Park, WA 98166-3460 George@Hadley.org Agency: Public	I was reading the Draft EIS web site alternatives and found several concepts listed that were new to me. These included "Truck operations improved", "Intelligent Transportation Systems", "Travel Demand management", and "Express Lane" (as opposed to General Purpose Lane.) I was hoping that you might be able to provide a link (where the terms are used) to a (new) page (or the FAQ section), where there would be a description of what they mean, how they would affect users of I-405, how they would reduce congestion, and how much they might cost.	Definitions for these concepts are in the glossary of the DEIS. The costs are detailed in the Recommendations Report on file at the WSDOT Urban Corridors Office.
E9	SOL	1	Linda Sarpy Agency: Public	I am commenting to the I-405 corridor plan placed on the internet. Basically, I believe that anything less than adding 2 general purpose lanes both directions is no fix at all. I-405 should be 5+1 lanes each direction (five general purpose, 1 HOV).	The Preferred Alternative includes up to two additional lanes in each direction on I-405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E9	SOL	2	Linda Sarpy Agency: Public	And the HOV lane should have restricted access, like those HOV lanes in southern California (I-10 going towards San Bernardino) and those on the LBJ freeway (I-635) in > Dallas, Texas. These examples have a thicker solid line between the general lanes and it, and are slightly separated. Plus with the restricted access, means someone can only enter or exit the lanes at certain points, usually before an off ramp for vehicles to exit (which is on the right side) and immediately after an on-ramp (which is also on the right side) for vehicles to come in and get make their way into the HOV lanes if they so choose.	Various means of more restricted access to the HOV lanes are being considered as part of the Preferred Alternative. Managing access to the HOV lanes is essential to maintain speed and reliability.
E9	SOL	3	Linda Sarpy Agency: Public	I feel this corridor should be consistent in lane numbers from SR 167 continuous through to the end at I-5 near Lynnwood (Alderwood Mall area). Having 5+1 lanes on both sides of the freeway would move goods and services and cut down or at least hold steady (as the years progress) the length of the commute hour. This fix needs to be a 20-30 year fix, not these cheap temporary do nothing to help the flow current fixes that are going on now or most recently with the so-called straightening of the S-curves (which still curve).	Thank you for your comments concerning lane balance.
E9	O	1	Linda Sarpy Agency: Public	When I came to this state in 1978, I was impressed with the forward thinking advanced express lanes system on I-5. I thought, WOW, this area is ahead of its time. Since then, this area has backslided and now become well behind moving goods and services -- it has failed to keep pace. But we are trying. And that is good!	Your comment is acknowledged.

Code Number			Name	Comment	Response
E9	TR	1	Linda Sarpy Agency: Public	Viewing the current I-405 it just never made since that the roadway narrows as you approach the largest employer in the state's facilities in Renton (Boeing). Between I-5 (Tukwila) and I-90, there is 2+1 lanes. Between I-90 and SR 522 there is 3+1 lanes, and between SR 522 and I-5 (Lynnwood, Alderwood Mall) it is back down to 2+1. Yet, Mill Creek has grown remarkably, even north Kirkland, Bothell and Monroe has grown dramatically, but the I-405 has not (except for adding the HOV lanes). The result has been that if you travel northbound on I-405 from Bellevue heading to Lynnwood after 2:30 p.m. weekdays, you run into some serious traffic just as you pass Kirkland-Totem Lake area. It used to be (back in the 1980s) that once you passed the Totem Lake exit on I-405 going northbound, you practically had the road to yourself from there all the way up to Lynnwood. The only way this happens nowadays is if there is a major accident blocking all lanes in Kirkland, and you happen to get on the freeway at Totem Lake and head north. We don't want that.	Thank you for your observations on travel behavior along I-405.
E9	O	2	Linda Sarpy Agency: Public	Please be sure to announce the public hearings over the media (radio, newspaper, TV news) after Labor Day when schools are back in session and people have returned from vacations and summer things. Making the broad announcement in the last 2 weeks of August is reaching the smallest amount of public as possible. And you want a good turnout at these hearings to get validity. I look forward to attending the September 18th hearing being held at the Northshore Senior Center. Thank you.	The I-405 Corridor Program provided public notice of the issuance of the Draft EIS and public hearings using a much more extensive approach than is required or is typically employed for other NEPA and SEPA EISs. This approach included the following: display ads were placed in the Seattle Times, Eastside Journal, and all community newspapers in the corridor on two occasions (weeks of August 17, 2001, and September 3, 2001); legal ads were placed in the Seattle Times and Eastside Journal on August 17, 2001; a news release was issued to local and regional media on August 17, 2001; media kits containing the announcement were mailed to all local and regional media outlets in the corridor the week of September 10, 2001; newsletters and display posters were distributed to all libraries, city halls, neighborhood organizations, public access television stations, and major employers in the corridor on August 17, 2001; notices were distributed through the program's mailing list and through the program's electronic newsletter on August 17, 2001; special populations fact sheets were distributed to social service providers in the corridor the week of August 17, 2001; and notice was placed on the program's web site on August 17, 2001. The volume and number of comments received, including your own, suggest that the program's efforts to invite public review have been largely successful.

Code Number			Name	Comment	Response
E10	SOL	1	Leonard L Rasquinha Leonard.Rasquinha@PSS.Boeing.com Agency: Public	Many of you have come up with a plan to Add 2 more lanes on each side of I-405. I think, this at best a short term solution.	Thank you for your comment.
E10	SOL	2	Leonard L Rasquinha Leonard.Rasquinha@PSS.Boeing.com Agency: Public	The real solution: Make I-405 a double layer freeway like in Seattle. One layer would go North, and One layer would go South. 1. This should reduce cost, since the DOT would not need to access/buy property near I405. 2. This would also make I405 safer for Drivers, since it would prevent rubber-necking when an accident happens.	Thank you for your comment.
E10	O	3	Leonard L Rasquinha Leonard.Rasquinha@PSS.Boeing.com Agency: Public	Please also use existing monies collected like 35 cent gasoline tax to fund these projects. Tax Money collected from Vehicle related collection efforts should be directed towards traffic related resolutions. These Taxes should also be distributed based on Statistics available from Tax Collection. So if Areas like East-side pay more taxes, then greater effort should be made to resolve traffic problems seen by the residents in these areas. Equitable Distribution of Wealth is never the answer to solve "urban congestion" issues.	Revenues required to implement the recommended range of multimodal projects will come from a variety of sources, including federal, state, and local agency programs. Legislative action and support from the local agencies and the public will be critical for generating the needed funds. Regional pricing strategies that could be implemented in the future include recommendations for use-based funding where those who benefit the most pay more.
E11	SOL	1	Greg Valentin greg.valentin@intp.com Agency: Public	Please provide better bicycle access/routes, more public/mass transit and carpool lanes.	All of the action alternatives would provide improved bicycle connections and crossings of I-405, new and expanded transit service and facilities, and HOV improvements on the freeway and/or arterials. Please refer to Chapter 2 of the I-405 Corridor Program Draft EIS for a discussion of the action alternatives and the improvements and modal elements that are contained in each.
E11	O	1	Greg Valentin greg.valentin@intp.com Agency: Public	While there is a need to grow, there is not a need to become like Southern California. More roads breeds dependence on cars. Limited growth with emphasis on mass transit is the sensible solution.	Thank you for your comment.

Code Number			Name	Comment	Response
E11	SOL	2	Greg Valentin greg.valentin@intp.com Agency: Public	When I lived in Portland, there was a lot of controversy over the development of light rail. Now that it is in place, it is highly effective and successful. A similar implementation of light rail in Seattle and along the I-405 and state route 167 corridor would, in my opinion, be even more successful if designed correctly.	Alternatives 1 and 2 considered a 40+ mile fixed-guideway transit system along the I-405 corridor. Quick bus connections to the SR 167 corridor were also included. The system was designed to provide access to the major activity centers within the study area. The Preferred Alternative includes a bus rapid transit system operating in improved access HOV lanes. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E12	SOL	1	Edwin M Schlapfer visualizepeace@juno.com Agency: Public	My input is very simple. Fix all the bottleneck points that exist with the minimum of cost. In other words maximize the lanes we currently have out on 405 and of use the best on ramp metering technology but do not build any new lanes to the system as a whole.	The corridor study analyzed improvements to the system of roads in the study area with the intent to meet the study purpose and need. The implementation of the improvments is expected to focus first on the key bottleneck points combined with major reconstruction of deficient roadway segments. A systemwide approach is needed to avoid moving bottlenecks from one location to another.
E12	SOL	2	Edwin M Schlapfer visualizepeace@juno.com Agency: Public	Second, install a fixed guideway using technology such as "www.aerobus.com" where you do not need to build any expensive track bed and do not have to give up any precious lanes of roadway and costing only 15 million a mile!	Alternatives 1 and 2 assumed that HCT service along the I-405 corridor would be provided by a physically-separated fixed-guideway system, without committing to a specific technology. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E12	COST	1	Edwin M Schlapfer visualizepeace@juno.com Agency: Public	7-11 billion is way to much to add four lanes to simply end up with choke on I-5.	Transportation improvements recommended from the I-405 Corridor Program will also benefit mobility region-wide parallel routes, reducing hours of congestion on I-5 and SR 99 in Seattle as well as within the I-405 corridor.
E12	O	1	Edwin M Schlapfer visualizepeace@juno.com Agency: Public	I love to drive, but the open roads of the early 1970's when I grew up here are over and we need to deal with our transportation problems like more dense countries have by providing a car alternative that does not cost as much as road system expansions.	Thank you for your comment.

Code Number			Name	Comment	Response
E12	SOL	3	Edwin M Schlapfer visualizepeace@juno.com Agency: Public	Again, fix any bottleneck points and install an aerobus.com type solution with feeder buses and park and ride lots and have the future ability to connect to Seattle, Northbend, Marysville, South Tacoma via the fixed guideway aerobus.	The Preferred Alternative includes a variety of transit and park-and-ride improvements combined with a bus rapid transit system.
E13	ALT	1	Shane Macaulay 3832 132nd Ave NE Bellevue, WA 98005 Agency: Public	I'd like to state my preference for alternative number 4 for the 405 corridor plan, which is the general capacity emphasis. I think it will be the most useful.	Please see response to comment L30.ALT-1.
E14	ALT	1	Tom and Anne Ryan 118 Ninth AVe Kirkland, WA 98033 Agency: Public	After reviewing your EIS Draft in some detail, I hope that you'll focus on Alternative Four, or adding general capacity to the I-405 corridor.	Please see response to comment L30.ALT-1.
E14	SOL	1	Tom and Anne Ryan 118 Ninth AVe Kirkland, WA 98033 Agency: Public	Mass transit makes no sense for a suburban area, and only increasing road capacity and building a new 520 bridge will help matters. Have the courage to build more roads - it's what real people who live here want.	Thank you for your comment.
E15	O	1	James Butzberger 8612 113th Way NE Kirkland Agency: Public	Thanks for the opportunity to address a project that will have significant long-term effects on our region. The various alternatives will have a major impact on how our culture evolves. My feeling is that this is an opportunity for us to reduce our dependency on the automobile and fossil fuels, and increase our interactions with our fellow citizens.	Thank you for your comment.
E15	ALT	1	James Butzberger 8612 113th Way NE Kirkland Agency: Public	I prefer Alternative 1 for several reasons: 1. It has the lowest cost of the action alternatives. 2. It has the lowest environmental impact. 3. It has the lowest construction impact. 4. It will encourage people and businesses to locate near the transit lines, and thereby reduce sprawl.	The Preferred Alternative is similar to Alternative 3. For a description of the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E15	SOL	1	James Butzberger 8612 113th Way NE Kirkland Agency: Public	I would love to be able to just walk a few steps from my condo in Kirkland, and hop on a train to Bellevue, Seattle, Renton, Redmond, and even to my job at SeaTac airport. For this to work, the transit would have to be clean, safe, frequent, fast, and operate for extended hours (say from 5am til midnight). If we put some of the money we save with this choice toward these goals, it would increase the ridership significantly.	Thank you for your comment.
E15	O	1	James Butzberger 8612 113th Way NE Kirkland Agency: Public	I've used rail transit in many cities around the world, and I'm convinced it's far superior to bigger freeways and increased traffic congestion.	Thank you for your comment.

Code Number			Name	Comment	Response
E16	O	1	Inez P. Petersen 3306 Lake Wash Blvd North #2 Renton, WA 98056-1978 425-255-5543 Agency: Public	Regardless of which plan you go with, get a good a cost estimate and a realistic schedule and stick with it. Cost overruns and projects behind schedule are the norm for the road projects. Why not surprise us this time?	Thank you for your comment.
E17	O	1	LeAnne Woolf LeAnneMyWo@aol.com Agency: Public	I don't see where building more road surface is really going to do much. People will just expand their driving habits to fill it. That just makes more cement for more nasty runoff, ugliness, and air pollution. Not to mention the traffic snarls created during construction which clear in time only to decide there needs to be more construction. When I was at the U, I took the bus all the time. Service has gotten better since, but there are still gaps for those on the east side of the lake. Still, you can't serve all the people all the time. I remember the biggest gap used to be late night service. Haven't looked recently at that issue myself. Baltimore has a real nice light rail. It was full the time I used it. D.C.'s subway sees a lot of use, too. I've been on a BART. That was good.	Thank you for your comment.
E17	O	2	LeAnne Woolf LeAnneMyWo@aol.com Agency: Public	When people get frustrated enough with the traffic jams, they'll wise up and use the mass transit system. IF it's available. IF it's efficient. IF it's running when they need it to be running. Then there's non-motorized traffic. Bicycles and walking are very healthful modes of transportation, but they're scary as hell to use around here. Downtown Bellevue is doggone non-pedestrian friendly, for example. And bike lanes there, ha! If you're afraid of being hit by a car, then you tend to just wrap up inside a car yourself and join all the other road rage nuts. I've dreamed for so long of a bicycle lane across 520 (out of your scope, I know).	Thank you for your comment.
E17	SOL	1	LeAnne Woolf LeAnneMyWo@aol.com Agency: Public	I realize with exit ramps you can't have bicycles along the freeway, but the surface streets nearby could be upgraded for bikes. It's too piecemeal right now as far as I've seen. You get most of the way where you're going, then you're stuck for a bit with no shoulder. Eeek!	The Preferred Alternative includes a variety of bicycle improvements for crossing I-405 and for completing major trail linkages along the corridor. In addition, many of the arterial improvements will be designed with improved bicycle facilities, consistent with local agency plans and design standards.

Code Number			Name	Comment	Response
E17	O	3	LeAnne Woolf LeAnneMyWo@aol.com Agency: Public	In short, anything but more lanes on 405. Yes, I got stuck in traffic on 405 for over a year going from Bellevue to work at Boeing in Kent, with little choice of mass transit because I never knew when I'd be working overtime, but I accept that that's the way it is, no matter how many lanes you put in.	Thank you for your comment.
E17	TR	1	LeAnne Woolf LeAnneMyWo@aol.com Agency: Public	It will be congested NO MATTER HOW MANY EXTRA LANES YOU ADD.	Please refer to comment E66.SOL-1.
E18	SOL	1	John LaBrie jwlabrie1@home.com Agency: Public	I feel strongly that a major cause of grief up and down I-405 is the nterchange with 167. That thing is a disaster. You need a clover leaf there which will prevent the intermingling of cars coming on to and off of the freeway. The ripple effect of that interchange is obvious each and every day, so that needs to be addressed for any other plans to have a prayer of working. I can't believe that we have waited this many years to address what is clearly the single greatest contributor (forget traffic volumes, it was bad even a decade ago) to the I-405 congestion.	Each of the action alternatives include substantial improvements to the SR 167/I-405 interchange. Alternatives 3 and 4 provide the maximum reconstruction of the interchange to eliminate the time-delaying and unsafe weaving movements that now occur. WSDOT is currently constructing an interim ramp improvement to reduce the delays that occur in the southbound direction on I-405 approaching the interchange.
E19	ALT	1	K. Camille Nims camilleebob@hotmail.com Agency: Public	I have been reading the alternatives you laid out at your website for transportation in the I-405 corridor. I just wanted to let you know that I believe that #1 is the best choice. #2 is OK.	Please see response to comment E15.ALT-1.
E19	SOL	1	K. Camille Nims camilleebob@hotmail.com Agency: Public	It's ridiculous that in this wealthy nation, we can't get around without automobiles. In much of the rest of the world, it's been taken care of long ago. Let's get with it here in Seattle and provide a reasonably priced means of public transportation so that low-income people can live in affordable neighborhoods and still get to jobs in the main job-centers.	Thank you for your comment.
E19	O	1	K. Camille Nims camilleebob@hotmail.com Agency: Public	Any alternative that doesn't focus on train-related, non-road public transport is crazy and a waste of time. We have enough roads and more than enough cars. We need to create an alternative for people who choose not to own cars -- or so that people in Seattle CAN choose not to own cars. Or for people who can't afford to own and maintain a vehicle.	Thank you for your comment.
E20	ALT	1	Jack S Allen jack.s.allen@Boeing.com Agency: Public	In my opinion, alternative 4 makes the most sense for the simple reason that it is the people with cars along with the commercial trucks that are congesting the highway, not the people who are forced to ride the transit system.	Please see response to comment L30.ALT-1.

Code Number			Name	Comment	Response
E20	O	1	Jack S Allen jack.s.allen@Boeing.com Agency: Public	Converting people from their private mode of transportation to public transit is like trying to get the pope to change his religion.	Thank you for your comment.
E20	SOL	1	Jack S Allen jack.s.allen@Boeing.com Agency: Public	Express traffic lanes will help eliminate the rubber necking effect of roadside distractions and enable long distance commuters and truckers to get through town with a minimal impact on city traffic as long as the on and off ramps have enough capacity to allow the express traffic onto the main corridor without disruption.	Thank you for your comment.
E20	SOL	2	Jack S Allen jack.s.allen@Boeing.com Agency: Public	Do not fall into the same pitfalls that I-5 has proven to be flow fatal. Left lane entrances and exits are fatal mistakes. Necking down traffic from four lanes to two or less just to feed onto a connecting freeway is also flow fatal. Crossing entrance and exit feeders are only asking for trouble and slowdowns.	Thank you for your comment.
E20	TR	1	Jack S Allen jack.s.allen@Boeing.com Agency: Public	I drive from Mountlake Terrace to Renton and back every day for the past twelve years so I have some experience with this corridor. I have carpooled approximately half of the time and found that it only cuts the commute about five minutes on the average day. On days that have unusual traffic it saves substantially more.	Thank you for your comment on your carpool travel times.
E20	O	2	Jack S Allen jack.s.allen@Boeing.com Agency: Public	As you probably well know, southbound traffic is impeded at the 520 interchange (crossing exit and entrance ramps) I-90 interchange (multiple lanes necked down to connect with another freeway) coalcreek parkway (crossing exit and entrance ramps) and the fabulous 167 / 405 interchange (probably the best example of how NOT to access one freeway to another in the entire northwestern united states. PLEASE do not employ any of these examples in your improvement plans for they will only guarantee failure. I'm sure you will find a way to finance this project on our backs so don't throw away our money on a plan that is doomed from the start.	Thank you for your comment.
E20	O	3	Jack S Allen jack.s.allen@Boeing.com Agency: Public	IF you do anything, do it right from the start, don't settle for the short term Band-Aid, it will only infuriate us out there on the road later.	Thank you for your comment.

Code Number			Name	Comment	Response
E21	SOL	1	Donald F. Padelford dfp@dfpnet.net Agency: Public	I favor a variation on Alternative 3, namely adding 2 HOT (high occupancy/toll) lanes each direction, as well as converting the exiting HOV lane to a HOT lane, thus creating a 3 GP / 3 HOT configuration over much of the corridor (3/3 x 3/3). Dynamic pricing would be applied in the manner of San Diego's I-15, to keep the HOT lanes free of congestion. Revenues collected from the HOT lanes would be used to add additional capacity to the corridor.	The Preferred Alternative includes support for considering a managed lane system along I-405. This system would likely consist of two lanes in each direction (i.e., the existing HOV lane plus the immediately adjacent lane). These lanes would be managed either through access controls, limits on users (such as HOV), or potentially through some form of pricing. Depending upon demand and operations, your suggestion for three managed lanes in each direction may be studied in the future. Keep in mind that many segments of I-405, however, will have a total of five lanes in each direction, not six, under the Preferred Alternative.
E22	ALT	1	Tim Brockhoff 1819 Vernon St. Seattle , WA 22314 Agency: Public	Washington State Department of Transportation's "Alternative 3" plan for I-405, which calls for the construction of four new lanes and the widening of neighborhood streets over 18 years, is not the answer to the region's traffic problems. Not only have independent studies shown that reliance on new lanes creates more traffic, Washington cannot afford the $8 billion price tag. In addition, "Alternative 3" threatens our quality of life. It will harm neighborhoods by boosting traffic on local streets, increasing noise, air and water pollution and worsening sprawl.	Please see response to comment E66.SOL-1.
E22	SOL	1	Tim Brockhoff 1819 Vernon St. Seattle , WA 22314 Agency: Public	I urge you to analyze "Alternative 5" as proposed by Sensible Solutions for 405. This plan will produce traffic improvements in half the time and at half the cost of "Alternative 3" by focusing on strategic road improvements, an aggressive trip reduction program and significantly increasing the number of buses, vanpools and park & rides. Thank you for your consideration.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service, including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E23	SOL	1	Todd Mills supertodd@earthlink.net Agency: Public	I have one thing to say on traffic. I think that ALL people who drive should use common sense and ride public transportation,Park your car suv and ride the bus. I-405 should be left as is	Thank you for your comment.
E23	O	1	Todd Mills supertodd@earthlink.net Agency: Public	Why should we all have to pay for those who drive,I think cartabs should be $1200.00 a year thats right make the drivers pay for something they caused.	Thank you for your comment.

Code Number			Name	Comment	Response
E24	O	1	Jim Persing 8023 124th Avenue NE Kirkland, WA 98033 jpersing@ncfweb.net Agency: Public	I have been making comments for years about I-405 and have never even had a response. It is my opinion that the power system in the Seattle area will never be happy until there is a mass transit system in place. It has nothing to do with reducing traffic congestion or making it easier for commuters who need their cars at work, work extra hours or have a small office with nobody to carpool with.	Thank you for your comment.
E24	O	2	Jim Persing 8023 124th Avenue NE Kirkland, WA 98033 jpersing@ncfweb.net Agency: Public	And the bus system -- It's better than it used to be but it still would take me about 45 minutes to get to work and I live about 15 minutes away. How does that save commute time? Until the WSDOT, the Governor, the legislator, the King County Council and the cities of Bellevue, Kirkland and Redmond are REALLY interested in reducing traffic congestion then don't ask me for more comments about studies that study old studies that study EIS statements, etc. The local governments can't even time traffic lights. They can't set the timing of traffic lights where the most traffic occurs. They put stop signs where there shouldn't be any. And then you ask me for comments?	Thank you for your comment.
E24	O	3	Jim Persing 8023 124th Avenue NE Kirkland, WA 98033 jpersing@ncfweb.net Agency: Public	I really think your unspoken philosophy is "If we don't build it they won't come". But since they came anyway it could be more accurately stated "If we don't build it they will leave".	Thank you for your comment.
E25	SOL	1	Randy Holmberg 24005 30th DR SE Bothell, WA 98021 randyholmberg@hotmail.com Agency: Monte Villa Highlands Home Owners Association	Alternatives 1 and 2: These alternatives appear to add a Freeway Off Ramp from I-405 at 240th ST which runs adjacent to our residential community. The Bothell Street Plan originally contained provisions for an overpass type connection that would extend 240th street across I-405. However, the Bothell Street Plan Connection 30-C was modified such that the overpass would be moved south to Monte Villa Parkway. Please consider modifying the I-405 Corridor Plan such that the Off Ramp shown at 240th is moved down to Monte Villa Parkway as well.	This interchange location has been nominally shown in the vicinity of 240th St SE. The exact location will be the subject of more detailed project-level studies, at which point optional access points (such as Monte Villa Parkway) will be considered. We will forward your comments to the project evaluation process.

Code Number			Name	Comment	Response
E25	SOL	2	Randy Holmberg 24005 30th DR SE Bothell, WA 98021 randyholmberg@hotmail.com Agency: Monte Villa Highlands Home Owners Association	I believe the same rational for moving the Bothell Street Plan connection 30C from 240th to Monte Villa Parkway applies here as well. The following reasons were cited on page 106 of the Bothell Street Plan Draft Report which was published in March of 2001. * The grade of the crossing is more favorable at Monte Villa Parkway (compared to NE240th ST). * The NE240th ST connection would have resulted in a major relocation of North Creek. * The Monte Villa connection impacts Business parking lots whereas the 240th Steet impacts residents. * Monte Villa is already improved with Curb and Gutter. * A Park-and-Ride garage could be more easily constructed at Monte Villa than 240th ST. * The Monte Villa crossing is closer to the end of 112th AVE NE requiring less road construction. * Monte Villa provides superior access to the commercial district.	Please see response to comment E25.SOL-1.
E25	N	1	Randy Holmberg 24005 30th DR SE Bothell, WA 98021 randyholmberg@hotmail.com Agency: Monte Villa Highlands Home Owners Association	Other Alternatives: Some of the other alternatives include adding lanes to improve capacity on I-405. Given that some of the homes in our community are within 100 yards of the existing freeway, I would request that any additional lanes added here include provisions for the same type of concrete sound barriers that were added along I-405 in Bellevue and Kirkland when the additional lanes were added.	At this stage, the overall potential for noise increases under each of the alternatives has been evaluated. Noise impacts at specific locations along the corridor, along with mitigation measures such as noise walls, will be evaluated as specific designs are developed.
E25	O	1	Randy Holmberg 24005 30th DR SE Bothell, WA 98021 randyholmberg@hotmail.com Agency: Monte Villa Highlands Home Owners Association	SUMMARY: In general, the I-405 Corridor Plans appear to be helpful for improving the traffic conditions in our region. Please consider the above suggestions to move the 240th ST Off-ramp to Monte Villa Parkway (to be consistent with local planning) and consider adding provisions for sound barriers to help mitigate any additional lanes constructed along I-405.	Thank you for your comment.
E26	SOL	1	Frank Schembs FNSeattle@aol.com Agency: Public	first priority should not be 405. GET ON WITH IT and build 18 into a full interstate. first state i5 to i90. And while building determine route north from i90 to i5 which might mean moving another 5-6 miles east along i90 but DO IT. it will help both 405 and 5	A study of a freeway in east King County sponsored by WSDOT (CONEKC) showed there would be some effects on the traffic on I-405. Development of a new east King County freeway corridor was not advanced for further consideration as part of the I-405 Corridor Program for the reasons discussed in Section 2.2.7 of the I-405 Corridor Program Draft EIS. This does not preclude future consideration of a rural King County freeway as part of another study.

Code Number			Name	Comment	Response
E26	SOL	2	Frank Schembs FNSeattle@aol.com Agency: Public	as another note, you are fighting i90 lane configeration changes into a 4-3-4 configeration. WHY? when so aligned (during construction and when the bridge sank) there were no unusual tie ups due to accidents. I have yet to see comparisons before, during and after so what are you hiding??	The I-405 project has taken no position on the I-90 configuration, which is undergoing separate environmental studies.
E27	N	1	Stephen Harlan shdesign@msn.com Agency: Public	I live in Renton, specifically Windsor Hills Addition thereto, just above the no-name access ramp to 405 N (exit 4 being at SR169 and exit 5 being at Park/Sunset)., right where Sunset Ave does an "S" curve under 405. During the last "improvements" to 405, the sound barrier walls stopped along the north bound lanes right at Sunset and then were started again a little ways north of where the no-name access ramp merged in to 405. What this has effectively done is create a channel through which all the road noise travels and then blasts up our hillside making use of our back yards virtually impossible at times. My wife and I, for the most part, can't even carry on a conversation, especially when the wind is from the north, affecting the direction and intensity of the noise. It's far worse now than it was before the walls were even constructed.	At this stage, there is not sufficient design detail to determine the noise effects of design options at specific locations; therefore, only the potential for noise increases under each of the alternatives has been evaluated. Noise impacts at specific locations along the corridor, along with mitigation measures, including noise walls, would be evaluated as specific designs are developed for areas of the corridor. Any capacity increases in the vicinity of Renton will include evaluation of the effectiveness of existing noise barriers and expansion of those barriers or construction of new ones as needed. Project design development may also evaluate realignment of ramp and roadway sections where feasible to reduce noise levels.
E27	SOL	1	Stephen Harlan shdesign@msn.com Agency: Public	I don't know where 4 new lanes of traffic are going to be squeezed through the Renton "S" curves but I do know that something has to be done about this acoustical design defect. Either get rid of the access ramp and wall the whole thing off, making people go up Sunset to Park Ave or staying downtown and getting on 405 by 169; or, extend the sound barrier wall on the Sunset overpass and start one near the beginning at the bottom of the access ramp extending till it connects to the full height wall further up.	See the response to your comment E27.N-1.
E27	N	2	Stephen Harlan shdesign@msn.com Agency: Public	Are there not maximum decibel ratings allowed along freeways?	As described in the EIS, FHWA has established, and WSDOT has adopted, noise abatement criteria. These levels are not absolute noise limits, but are levels above which abatement measures must be evaluated for new projects.

Code Number			Name	Comment	Response
E28	SOL	1	Scott Lumsden lumsden1@msn.com Agency: Public	My comment is that traffic congestion will only be solved by reducing traffic! - taking more cars off the roads; not making more room to add cars to the roads. We need sensible transit options: * more frequency on bus routes * encouraging bicycles * light rail that connects the eastside to the westside	Each of the action alternatives includes substantial increases in transit frequencies. Alternatives 1 and 2 include a high-capacity transit system using a fixed-guideway method, while Alternative 3 includes a bus rapid transit system. Each of these systems was found to attract similar levels of transit riders using up to twice the level of transit service that currently exists in the corridor. The shift to transit riders was most notable in the peak periods, with transit usage approaching 15 percent in downtown Bellevue and up to 10 percent in other activity centers in the corridor. These levels are encouraging but were found not to remove the need for making roadway improvements in the corridor as well. Therefore, the Preferred Alternative is a balanced approach serving multiple modes of travel. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E29	PPA	1	Brad Norton 13421 129th Pl. NE Kirkland, WA 98034 Agency: Public	Please log my endorsement of the Preliminary Preferred Alternative (PPA). It is the most comprehensive and cost-effective way in which to serve the transportation needs of the Eastside of Lake Washington---and is critically needed!	In January 2001, the Executive Committee for the I-405 Corridor Program recommended a preliminary preferred alternative that represented their then-current thinking on the direction of the program. The preliminary preferred alternative was similar to Alternative 3, but there were differences. Please see response to comment L6.ALT-1. The Preferred Alternative is also similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E30	ALT	1	Catherine Arend ArendCC2@dshs.wa.gov Agency: Public	I favor alternative 3, but I also think a 4 lane express way is a very good idea.	Please see response to comment L12.ALT-1.
E30	O	1	Catherine Arend ArendCC2@dshs.wa.gov Agency: Public	I like the idea of mixed mode emphasis, but would probably not take mass transit no matter what you did.	Thank you for your comment.

Code Number			Name	Comment	Response
E30	O	2	Catherine Arend ArendCC2@dshs.wa.gov Agency: Public	We already subsidize transit, and are not getting our money's worth. I am not interested in penalizing the people who do take transit, but would like to see MY tax dollars go for something I want as well.	Thank you for your comment.
E30	ALT	2	Catherine Arend ArendCC2@dshs.wa.gov Agency: Public	I think alternative 3 is the most across the board improvement of the 4.	Please see response to comment L12.ALT-1.
E31	ALT	1	Marianne Conger Director of Information Technology WA Society of CPAs 902 - 140 Ave NE; Bellevue, WA 98005 Agency: Public	I have just skimmed the Executive Summary of your EIS for I405. It seems that if I am reading it correctly, that Alternative 2 is the best for our long term needs. This is especially true if it is done in conjunction with work that other communities are doing that may link up to the I405 corridor.	The Preferred Alternative is similar to Alternative 3. For a description of the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E31	SOL	1	Marianne Conger Director of Information Technology WA Society of CPAs 902 - 140 Ave NE; Bellevue, WA 98005 Agency: Public	I assume that the HCT that is discussed is a lightrail type of solution. I have experienced the subway and light rail systems in Washington DC, Boston, and most recently Japan. I can say without doubt that a rail system of some sort, especially one that is linked to other communities, is the best solution. We can't be looking at today or tomorrow's answer for the solution. We've been doing that for the last 25 years and now we're stuck. There are going to be people that are impacted unfavorably for a time, but if we are going to do more than put a stick in the dike of the problem, we have got to move forward with more proactive solutions.	The I-405 Corridor Program Alternative 1 - HCT/TDM Emphasis, and Alternative 2 - Mixed Mode with HCT/Transit Emphasis, both contain a physically separated, fixed-guideway, high-capacity transit system potentially using some form of rail technology as described on pages 2-1 through 2-7 of the I-405 Corridor Program Draft EIS. These systems, along with the bus rapid transit system included in Alternative 3 (and the Preferred Alternative) were found to attract similar levels of transit riders using up to twice the level of transit service that currently exists in the corridor. The shift to transit riders was most notable in the peak periods, with transit usage approaching 15 percent in downtown Bellevue and up to 10 percent in other activity centers in the corridor. The transit systems would have sufficient capacity remaining after 2020 to accommodate future demands within the I-405 study area. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
E31	SOL	2	Marianne Conger Director of Information Technology WA Society of CPAs 902 - 140 Ave NE; Bellevue, WA 98005 Agency: Public	One more lane on I405 is just a temporary solution. Forget about the temporary ones and put the money and effort towards networking our communities together.	Thank you for your comment.
E32	TR	1	Lester Goldstein 3735 Meridian Ave. N Seattle WA 98103 Agency: Public	I cannot believe that you are seriously considering a preferred alternative for I-405 that would include adding two lanes of traffic in each direction. Knowing that will only attract a great deal of additional traffic, such a proposal should be recognized as insanity. Rarely has adding more highway space ever eased congestion for more than a brief period, otherwise Southern California commuting would be heavenly.	Please refer to comment E66.SOL-1.
E32	TR	2	Lester Goldstein 3735 Meridian Ave. N Seattle WA 98103 Agency: Public	You will never ease traffic suggestion by encouraging more automobile use.	Please refer to comment E66.SOL-1.
E33	TR	1	Steve Francis 13901 SE 47th St. Bellevue WA 98006 Agency: Public	1. On page ES-13, I disagree with finding that none of the action alternatives would substantially improve congestion compared to current levels on roads other than I-405. A classic example where 405 improvements will dramatically improve surface arterials is in the Factoria area. Here, much office traffic (from buildings along I-90) drives through Factoria to get on 405 at Coal Creek Parkway, instead of accessing the freeway system at I-90 in Eastgate. If the I-90 merge to SB 405 flowed smoothly (as I would expect in Alternative 3 or 4), this traffic would be incentivized to get off the local arterials, resulting in significant reduction in local congestion.	The congestion effects of improvements to I-405 cannot be isolated to the freeway itself. While average congestion would be reduced on the I-405 facility by 1 to 2 hours, there would also be reductions in congestion on arterials and other freeways in the study area. At the same time, the action alternatives accommodate additional persons within the corridor with lower levels of congestion. Therefore, total regional vehicle and person hours of travel decrease due to the I-405 improvements.
E33	SOL	1	Steve Francis 13901 SE 47th St. Bellevue WA 98006 Agency: Public	2. On page ES-14, I understand the validity of assuming the additional lanes would be proposed for the entire length of the project at this phase on the analysis. I hope you will actively consider the use of drop lanes to balance flow. A couple of examples:	All alternatives include a package of basic improvements that include collector and distributor lanes for these choke points.

Code Number			Name	Comment	Response
				> * a. SB 405 at I-90: Two incoming lanes from I-90 merge with three SB lanes, all funneling into three SB lanes (all complicated by the close-coupled Coal Creek interchange). The addition of more SB lanes (or the constriction of SB lanes prior to the merge) would allow an easier merge. > * b. NB I-405 between NE 85th and NE 116th: High volumes of traffic center at 85th and exit at 116th. The traffic exiting at 116th often slows in the #3 lane (one from the right), waiting for the entering traffic to get up to speed in the #4 lane and merge in. This action paralyzes two (of the 3) GP lanes. If a drop lane was added to accommodate the entering 85th traffic and the exiting 116th traffic, the #3 lane would continue to function properly for thru traffic. This approach of add/drop at interchanges is routinely used in the Chicago area.	
E34	SOL	1	Barbara Poyneer 18149 147 Ave. SE Renton WA 98058 Agency: Public	Many people who live in the southeast of the corridor in the Maplewood, Fairwood, Covington and other neighborhoods, go up to Redmond and Woodinville on a regular basis; many are daily commuters. Presently we have to head west on crowded streets and arterials to get to 405, make our way through thoroughly congested traffic on 405, and then head east to our destinations on crowded streets and arterials. How much better it would be if there were an alternative. Why not an arterial that runs from at least the Maple Valley Highway, north along the Jones Road/Coal Creek Pkwy route indicated in your alternatives 3 and 4 but continues on through and beyond Factoria and I-90 to Redmond. Hooking up with 148th NE at I-90 would be a good idea even though it might require construction east of Factoria rather than through it. Constructing a four lane arterial through this area should be much cheaper than adding lanes to 405. It would drain off substantial numbers of cars from 405, relieve congestion on arterials and streets leading to 405, and shorten the drive.	We will forward your suggestion to the local jurisdictions along this route.

Code Number			Name	Comment	Response
E34	SOL	2	Barbara Poyneer 18149 147 Ave. SE Renton WA 98058 Agency: Public	Currently, King County is adding lanes to 140th SE from the Maple Valley Hwy south and eventually will add lanes all the way to about 256th or even Kent Kangley. All of these projects are disconnected from each other. Wouldn't it be wonderful if they could be connected smoothly and run from Kent Kangley up to SR 522! I have suggested this alternative to study groups before, but no one ever seems to take it up. Is there some reason why such an alternative paralleling 405 but to the east could not be built? I am not suggesting a freeway - only a four lane arterial. SR 18 does not help as it goes too far north east and is itself crowded. Is it because of the rural-urban boundary line and the fears that additional good roads through that area might lead to unwanted growth in the area? If so, maybe the rural-urban line needs to be rethought. All the routes I have suggested appear within the study area outlined in the maps in the Citizen's Guide so I am doubtful that the rural-urban designations could be a major factor, but one never knows.	Alternatives 3 and 4 include improvements to the portion of Coal Creek Parkway from Newcastle to Renton. Development of new east King County arterials were identified through the CONEKC study. Preliminary analysis indicated that these arterial improvements would provide substantial congestion reduction to the regional and the I-405 corridor. However, like the freeway, the proposal also would likely violate the objectives of the I-405 Corridor Program Purpose and Need to planned regional growth and environmental protection because of its effects outside the Urban Growth Boundary, and because of the substantial impacts to the natural environment.
E35	ALT	1	Denise Skyba rv-densky@microsoft.com Agency: Public	After reviewing the 4 purposed alternatives I would like to strongly urge the push for Alternative #2. As a person who spends 1 hour on a 12 mile commute on 405 I am very interested in getting additional highways and High Capacity Transit	Please see response to comment E31.ALT-1.
E36	TR	1	Rami Haddad mdxix@hotmail.com Agency: Public	Good morning, I read in the March 2001 newsletter the travel profiles in the year 2020 in the form of two pie charts. How do the profiles look for the current year (or most recent)?	We did not produce similar data for current conditions. However, Appendix I of the DEIS shows 1995 conditions in comparison with the 2020 conditions.

Code Number			Name	Comment	Response
E37	TR	1	Rami Haddad mdxix@hotmail.com Agency: Public	Good morning, where do you report the details behind two pie charts in the March 2001 newsletter? I reviewed appendix I of the EIS report. I could not find comparable data. Let's take the first chart for example. It represents the travel profile in 2020 if we do nothing. It states the following percentages: - Carpool/vanpool: 43% - Transit: 2% - Single occupant vehicles: 55% When I read appendix I of the EIS report, all three tables report numbers different from these above. I used the tables for Bellevue screenline for the no-action scenario. - Table 1b: - HOV: 26% - Non-HOV: 73% - Bus transit: 0% - Table 2b: - HOV: 21% - Non-HOV: 79% - Bus transit: 0% - Table 3b: - HOV: 12% - Non-HOV: 81% - Bus transit: 6% Where do I find the details behind the two pie charts on the March 2001 newsletter?	The newsletter percentages for carpool/transit include non-work related HOV trips, which are classified as non- HOV in Appendix I. Appendix I shows data taken directly from the travel model, which only forecasts work-related HOV trips. For the newsletter, we made some estimates of non-work related HOV usage, resulting in a higher reported level of carpool/vanpool. For the FEIS, we have reported both work and nonwork HOV trips in Section 3.12.
E38	SOL	1	Peter and Naomi Rimbos 19711 241st Ave SE Maple Valley, WA 98038-8926 Agency: Public	As users of I-405 we encourage WSDOT to evaluate Alternative 5, as proposed by Sensible Solutions for 405. Alternative 5 is based on 3 principles: 1. Costs <$4 billion, so it is more likely to be funded and can be built more quickly. 2. Has two new lanes instead of four; and that gives priority to transit, vanpools, and carpools. 3. Spends more on trip-reduction incentives (bus pass, flexible work hours and weeks, telework, more jobs located near transit centers).	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E38	TR	1	Peter and Naomi Rimbos 19711 241st Ave SE Maple Valley, WA 98038-8926 Agency: Public	We believe that WSDOT's preferred alternative has four serious flaws: 1. It won't work -- "Build it and they will come." Independent studies show that 90% of new road capacity is gobbled up by new trips within 5 years of construction; this after 10 - 18 years of construction-related snarled traffic	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3 - Mixed Mode Emphasis. Much of the utilization of new road capacity is related to the growth in population and employment within the study area and region. The other effects, known as induced travel, have been largely accounted for in the I-405 travel forecasts. Please see comment E66.SOL-1 related to induced travel.
E38	COST	1	Peter and Naomi Rimbos 19711 241st Ave SE Maple Valley, WA 98038-8926 Agency: Public	2. It's too expensive -- $7.7 billion is as much as the entire region is likely to raise for transportation in the next 10 years. With the Alaska Way Viaduct, SR 520, I-5, and transit all needing investments, nearly $8 billion for I-405 is so unrealistic it will delay funding.	Please refer to comment E66.SOL-1.
E38	TR	2	Peter and Naomi Rimbos 19711 241st Ave SE Maple Valley, WA 98038-8926 Agency: Public	3. It will harm neighborhoods -- Adding so much new pavement will draw thousands of new trips, increasing traffic on neighborhood streets.	Thank you for your comment regarding neighborhood impacts. Please refer to comment E66.SOL-1.
E38	O	1	Peter and Naomi Rimbos 19711 241st Ave SE Maple Valley, WA 98038-8926 Agency: Public	4. It worsens sprawl and pollution -- Scientific studies show that the new lanes will worsen water, air, and noise pollution.	Thank you for your comment regarding sprawl and pollution. Please refer to comment E66.SOL-1.
E38	SOL	2	Peter and Naomi Rimbos 19711 241st Ave SE Maple Valley, WA 98038-8926 Agency: Public	Please consider our very real concerns and evaluate Alternative 5. Thank you.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. Please refer to the response to comment E66.SOL-1.
E39	PPA	1	John Graves, Newcastle JohnG@LozierHomes.com Agency: Public	I am writing in support of the Preliminary Preferred Alternative aka Alternative 3 for I-405 WSDOT's Corridor Program. I have reviewed this alternative and don't believe it goes far enough in contructing new lanes for I-405 but it represents an acceptable middle ground with those supporting complete gridlock along I-405.	Please see response to comment E29.PPA-1.

Code Number			Name	Comment	Response
E39	TR	1	John Graves, Newcastle JohnG@LozierHomes .com Agency: Public	Our population continues to grow and has resulted in the consequent increase on capacity/demands for our roads. For the last twenty years we have been negligent in the construction of new roadway capacity which has resulted in the high degree of congestion that we experience today.	The I-405 Corridor Program evaluates growth effects through 2030.
E39	ECON	1	John Graves, Newcastle JohnG@LozierHomes .com Agency: Public	The main issue is economic. This congestion is inhibiting our economy and will continue to threaten its growth until we agree to increase the capacity of our roadway system i.e build more lanes and fix bottlenecks. That does not mean to cast aside mass transit. It does mean to concentrate 97% of our resources to 97% of the problem.....which is roadway capacity. The statistics are clear; mass transit satisfies the mobility demands for about 3-5% of those utilizing roadways. The rest of us taxpayers (95%-97%) have a need to utilize the roadways in an automobile.	Thank you for your comment.
E39	ECON	2	John Graves, Newcastle JohnG@LozierHomes .com Agency: Public	If we continue on the same path we have been walking for the last twenty years, businesses will start walking a different path to other states and locations. We need to stop being so arrogant that we feel people and businesses will continue to locate here at any cost....they won't.	Your comment is acknowledged.
E39	O	1	John Graves, Newcastle JohnG@LozierHomes .com Agency: Public	PLACE THE PRIORITY ON BUILDING MORE CAPACITY AND THEN....BUILD IT!!!	Thank you for your comment.
E40	O	1	T.J. Woosley Hal Woosley Properties, Inc. "Commercial Real Estate Services" P.O. Box 3325 Bellevue, WA 98009-3325 Agency: Public	This message comes to you on behalf of the 64 businesses along the I-405 corridor located in commercial properties represented by Hal Woosley Properties, Inc.. These businesses' success is dependent upon the reduction of congestion and the improvement of mobility in our region and particularly along I-405.	Thank you for your comment.

Code Number			Name	Comment	Response
E40	PPA	1	T.J. Woosley Hal Woosley Properties, Inc. "Commercial Real Estate Services" P.O. Box 3325 Bellevue, WA 98009-3325 Agency: Public	We are in strongly support the Preliminary Preferred Alternative (Alternative 3) of the I-405 D.E.I.S. and are particularly in support of the 2 additional general purpose lanes, which appear to provide the most congestion relief.	Please see response to comment E29.PPA-1.
E40	SOL	1	T.J. Woosley Hal Woosley Properties, Inc. "Commercial Real Estate Services" P.O. Box 3325 Bellevue, WA 98009-3325 Agency: Public	In addition, the general purpose lanes appear to be the most cost effective component of the Alternative in accommodating the projected passenger trips.	Thank you for your comment.
E40	O	2	T.J. Woosley Hal Woosley Properties, Inc. "Commercial Real Estate Services" P.O. Box 3325 Bellevue, WA 98009-3325 Agency: Public	Finally, I believe the general purpose lanes have the least environmental impact per passenger trip. My position is based on the facts presented in the D.E.I.S.	Thank you for your comment.
E41	ALT	1	Leslie McClure / 333 7th Ave. Kirkland, WA 98033 Agency: Public	Please accept this mail as a comment in favor of Alternative 3.	Please see response to comment L12.ALT-1.
E41	SOL	1	Leslie McClure / 333 7th Ave. Kirkland, WA 98033 Agency: Public	If it doesn't go through, how about the idea of tollways?	"Pricing" such as tolls is being considered as a regional policy.

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E41	SOL	2	Leslie McClure / 333 7th Ave. Kirkland, WA 98033 Agency: Public	An increased gas tax should be accepted, even though the proceeds are distributed unfairly in favor of counties who complain they don't have King County's problems and shouldn't pay higher taxes. However, if a higher gas tax won't fly, how about tollways? Then it really will be those who use 405 who will pay for it.	Thank you for your comment.
E42	SOL	1	Kevin Moore 508 Summit Ave E #14 Seattle, WA 98102 kevin1006@home.com Agency: Public	I have heard of plans to expand Interstate 405. I encourage you to to evaluate Alternative 5, as proposed by Sensible Solutions for 405. It costs less and makes more sense.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E42	TR	1	Kevin Moore 508 Summit Ave E #14 Seattle, WA 98102 kevin1006@home.com Agency: Public	FLAW #1: Building more lanes simply encourages more traffic, which cloggs up those lanes.	Please see the response to comment E66.SOL-1 related to induced travel.
E42	COST	1	Kevin Moore 508 Summit Ave E #14 Seattle, WA 98102 kevin1006@home.com Agency: Public	FLAW #2: It's too expensive.	See response L50.COST-1.
E42	TR	2	Kevin Moore 508 Summit Ave E #14 Seattle, WA 98102 kevin1006@home.com Agency: Public	FLAW #3: It will negatively impact the quality of life in neighborhoods close to freeway entrances and exits.	Please refer to comment E66.SOL-1.

Code Number			Name	Comment	Response
E42	LU	1	Kevin Moore 508 Summit Ave E #14 Seattle, WA 98102 kevin1006@home.com Agency: Public	FLAW #4: It will encourage sprawl.	Please see the responses to comments L27.LU-1 and E66.SOL-1.
E43	ALT	1	David Schooler DavidS@SterlingRealty.com Agency: Public	I am writing in support of Alternative 3. Though expensive, Alternative 3 has been shown to be the most cost-effective.	Please see response to comment L12.ALT-1.
E43	SOL	1	David Schooler DavidS@SterlingRealty.com Agency: Public	I believe the corridor is need of both high capacity and general purpose improvements. The need for high capacity is to provide alternatives to general purpose. The need for more general purpose is to provide for the increase in traffic flow and decrease the use of other, surface roadways. Alternative 3 strikes a proper balance.	Thank you for your comment.
E43	O	1	David Schooler DavidS@SterlingRealty.com Agency: Public	The Sensible Friends suggestion confounds me. Their representatives have participated in this quite thorough process. Alternative 3 represents a compromise. I consider it unfair, senseless and negative to consider cutting back on that compromise further.	Thank you for your comment.
E44	ALT	1	Wpnelson@aol.com Agency: Public	Bottom line is that it looks like Alt. 3 is the best way to go for now considering the many years in development and the need to move forward without further delay.	Please see response to comment L12.ALT-1.
E44	O	1	Wpnelson@aol.com Agency: Public	I would hope that the projects are closely monitored and strict performance goals are set along with penalties for WDOT and the contractor(s) if those goals are not met. I would suggest penalties up to killing the remainder of the project(s).	Thank you for your comment.
E45	O	1	George Joy 8221 122nd Ave NE Kirkland, Washington 98033 georgejoy@hotmail.com Agency: Public	I live in the South Rose Hill area of Kirkland and am alarmed at the expansion plans for I-405. Although I live two blocks from the freeway, there is a constant drone of traffic throughout the day and night. Additionally, the traffic on 908E and other arterial streets is always congested around rush hour.	The study alternatives included improvements to SR 908 at I-405.

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E45	SOC	1	George Joy 8221 122nd Ave NE Kirkland, Washington 98033 georgejoy@hotmail.com Agency: Public	Two additional lanes on the freeway (alternative 3) will dramatically worsen both the above problems. Our neighborhood will be practically unlivable.	Thank you for your comment.
E45	TR	1	George Joy 8221 122nd Ave NE Kirkland, Washington 98033 georgejoy@hotmail.com Agency: Public	It is clear that what we need is means for more efficiently carrying commuters, not additional lanes. Independent studies show that reliance on new lanes creates more traffic and more sprawl.	Refer to comment E66.SOL-1.
E45	SOL	1	George Joy 8221 122nd Ave NE Kirkland, Washington 98033 georgejoy@hotmail.com Agency: Public	I would recommend Alternative 5 as proposed by Sensible Solutions for 405 as a more responsible and long-term approach that combines road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E46	O	1	Jreyr@aol.com Agency: Public	Found the notice of your EIS and comment opportunities in this AM Seattle Times, 21 Sep, 01; nice that from the web site I learn all comment meetings were over 20 Sep.! I conclude, this was diliberate to appear to welcome public involvement, but in fact, frustrate it. I may or may not have a chance to see the EIS, which in themselves, by and large, are uninformative!	The I-405 Corridor Program provided public notice of the issuance of the Draft EIS and public hearings using a much more extensive approach than is required or is typically employed for other NEPA and SEPA EISs. This approach included the following: display ads were placed in the Seattle Times, Eastside Journal, and all community newspapers in the corridor on two occasions (weeks of August 17, 2001, and September 3, 2001); legal ads were placed in the Seattle Times and Eastside Journal on August 17, 2001; a news release was issued to local and regional media on August 17, 2001; media kits containing the announcement were mailed to all local and regional media outlets in the corridor on week of September 10, 2001; newsletters and display posters were distributed to all libraries, city halls, neighborhood organizations, public access television stations and major employers in the corridor on

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					August 17, 2001; notices were distributed through the program's mailing list and through the program's electronic newsletter on August 17, 2001; special populations fact sheets were distributed to social service providers in the corridor the week of August 17, 2001; and notice was placed on the program's web site on August 17, 2001. The volume and number of comments received, including your own, suggest that the program's efforts to invite public review have been largely successful.
E46	TR	1	Jreyr@aol.com Agency: Public	I-405 is consistently jugged up at and approaching the I-90 interchange, up the Kennydale hill, at the SR-169 south bound on-ramp, at the SR-167 bound ramps, and several on-off ramp sites. I have no doubt you are abundantly aware of these facts. I am not sure you know, or more likely are in denial that at the above specific sites, the HOV lanes enormously exacerbate the pileups, by effectively reducing the through lanes to one (1) lane, or less. This occurs on the Kennydale Hill, either direction but especially southbound, due to trucks unable to pull the grade at freeway speeds, and often down to 30 MPH and less, blocking, at leat, the outside lanes. Often a slightly faster truck pulls into the center lane, blocking it, and the HOV restriction is of no benefit, except to those very few 2+ person vehicles. The interchange problem has several contributing causes, but in all cases is greatly exacerbated by HOV lanes. Doubtless, a primary cause is lack of specific on-off ramp lanes, especially off ramp. Remediation of this requires major construction.	The Preferred Alternative includes a balance of roadway expansion HOV and transit improvements. Additional hill-climbing lanes for trucks are being considered on Kennydale Hill.
E46	TR	2	Jreyr@aol.com Agency: Public	The exacerbation due to HOV lanes is of at least two forms: they restrict traffic flow by their very restriction and the frustrate traffic flow due to drivers crossing the one through lane to leave or access the HOV!	The HOV lanes on I-405 have been included as a core feature of the bus rapid transit system. In the Preferred Alternative, carpool and vanpool use are forecasted to increase as well.
E46	SOL	1	Jreyr@aol.com Agency: Public	The remedial steps are easy and fairly inexpensive compared with all other measures: A. Preferably, do away with HOV lanes. B. If not A. above in total, than at least remove the restriction in the vicinity of the congested regions, e.g., I-405 and SR-167, SR-169, S-curves, Kennydale Hill, I-90, Bellevue, SR-520, and probably the Kirkland and Totel Lake on-off points.	During the peak periods of congestion, the HOV lanes are near capacity currently. By 2020, HOV lanes will likely be limited to 3+ passengers. Opening up HOV lanes to all traffic would make little impact on peak-period congestion and would reduce overall person flows.

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E46	O	2	Jreyr@aol.com Agency: Public	But I really wonder, from whence came the HOV obsession. Even though I can (and do) take advantage of HOVs, with considerable guilt feelings. The have not been significant to reducing traffic, are an outrageous waste of taxpayer money to benefit very few and, in fact, are counter-productive. I can only concluded it is one of those "politically correct" schemes, that satisfy a noisy gang of revisionists and opponents to good sense, not to mention engineering.	See response to comment E48.TR-2.
E47	SOL	1	Dean Rebhuhn deanr@johnlscott.com Agency: Public	405 needs the additional general purpose lane capacity in conjunction with other multi- model improvements. Without the additional capacity we are not solving the problems.	The Preferred Alternative contains a bus rapid transit system operating in improved access HOV lanes, as well as other substantial improvements including park-and-ride lots, transit stations, bicycle and pedestrian facilities, and truck freight enhancements. The Preferred Alternative also includes up to two additional lanes in each direction on I-405 to help reduce congestion and improve mobility across all transportation modes. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E48	O	1	Anne Phillips 4010 89th Ave SE Mercer Island, Washington 98040 felicity@nw.incc.net Agency: Public	I attended the hearing in Bellevue 9/20, and I was disturbed by the strong impression I got that, although the moderator was gracious and the committee members seemed attentive to public comments, this was just a front. They were just tolerating the process as a legally necessary nuisance, not as valuable input that might influence decisions.	As demonstrated by identification of the Preferred Alternative and the I-405 Corridor Program Final EIS, public and agency comment are taken very seriously and all of the feedback received is deliberately considered.
E48	WR	1	Anne Phillips 4010 89th Ave SE Mercer Island, Washington 98040 felicity@nw.incc.net Agency: Public	I spoke at the hearing as a citizen who opposes the unnecessary addition of pavement, pointing out that four 11-ft-wide lanes for 30 miles would be the equivalent of 160 acres of impervious surface, causing flooding and pollution of waterbodies.	Potential impacts and mitigation measures to floodplains and water resources associated with alternative increases of impervious surface are described in Sections 3.10 and 3.5, respectively, of the Draft EIS.
E48	O	2	Anne Phillips 4010 89th Ave SE Mercer Island, Washington 98040 felicity@nw.incc.net Agency: Public	We feel that adding general-use lanes would only add more of those SOVs, cost too much, and be a terrible mess for a long time.	Thank you for your comment.

Code Number			Name	Comment	Response
E48	SOL	1	Anne Phillips 4010 89th Ave SE Mercer Island, Washington 98040 felicity@nw.incc.net Agency: Public	After reporting on the hearing to the other riders the next morning, I have an additional idea to put forth that wasn't addressed at the hearing. We feel there should be a massive public education effort made to encourage alternative ways to get to work, such as public transit and car/vanpools. All those people in their own cars, traveling to their own destinations on their own schedules, must have some personal reasons that justify the illogic of their daily habit. We need to find out why they do this (what the barriers are to a more sensible way to go), and address those barriers with a massive education campaign. It should point out the benefits, to the commuter and to the environment, of sharing rides or taking the bus. It needs to establish the idea that smart commuting is the norm -- just like the "Designated Driver" campaign against drunk driving a few years ago that forged a new behavior pattern for the nation. If we spend even 15% of the proposed budget on public education to get those SOVs off the road, it would be more effective, cheaper and quicker than all the capital improvements and mitigations of any of the proposed alternatives.	The State of Washington has been promoting carpooling and transit since the passage of the Commute Trip Reduction Law in the early 1990s, and even before then. The TDM program included in all the Alternatives will be one of the largest in the United States and will include education programs.
E49	ALT	1	Stu Vander Hoek 6410-106th Ave. NE. Kirkland, WA. 98004 stuvhc@nwlink.com Agency: Public	I strongly support Alt. #3 because it is the most cost effective and efficient proposal to reduce congestion while improving safety on neighborhood streets. It is critical that we move as quickly as possible to incorporate these improvements along the length of the 405 corridor. And, to find out that this alternative is the most environmentally friendly choice is an added bonus.	A number of different views have been expressed by the public and resource agencies concerning which alternative is the most environmentally friendly. Chapter 3 of the I-405 Corridor Program Draft EIS provides the best and most detailed evaluation and discussion of the environmental effects of the action alternatives. A discussion of some of the trade-offs that must be considered is included in Sections 3.24 and 3.25 of the I-405 Corridor Program Draft EIS.
E49	O	1	Stu Vander Hoek 6410-106th Ave. NE. Kirkland, WA. 98004 stuvhc@nwlink.com Agency: Public	Our family operates two businesses in Kirkland that are highly dependent on a free flowing road and highway system. We own commercial and multi-family residential property in both Kirkland and downtown Bellevue. Our tenants need these improvements to better operate their businesses be competitive by providing better travel times in getting customers back and forth. Our apartment residents need these them so they can get back and forth to their jobs in a safe and timely fashion.	Your comment is acknowledged.
E50	N	1	Del99mar@aol.com Agency: Public	Please, do not make 405 in the Bellevue area any larger. I live in Woodridge and due to the noise level from 405, to listen to our TV at night, we have to close all our windows, we cannot enjoy our backyard without having to yell at each other and at night, we sleep with ear plugs when the windows are open.	Thank you for your comment concerning the effects of noise intrusion. During follow-on project-level environmental analysis, the I-405 Corridor Program will conduct additional, more detailed noise analyses and review of the effectiveness of other potential noise mitigation approaches for possible implementation. Also, please see the response to comment T64.N-1.

Code Number			Name	Comment	Response
E50	O	1	Del99mar@aol.com Agency: Public	It is not the fault of local residence that the traffic has increased. Woodridge and many other communities close to 405 are well established neighborhoods that are being ruined because of people moving into the outer areas. The noise level is already unbearable and is only made worse by the airplane flight paths	Air traffic and airplane flight paths are outside the scope of the I-405 Corridor Program EIS, and would not be affected by the proposed action or alternatives.
E51	ALT	1	R.C. Wallace PO Box 4184 Bellevue, WA. 98009-4184 rwallace@wallaceproperties.com Agency: Public	I understand that you are in the comment period for the I-405 study. I am strongly in favor of the alternative which includes at least two general purpose lanes in each direction.	The Preferred Alternative; Alternative 3 - Mixed Mode Emphasis; and Alternative 4 - General Capacity Emphasis; would add at least two general purpose lanes in each direction on I-405. The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3.
E52	SOL	1	Dean Rebhuhn deanr@johnlscott.com Agency: Public	We need the additional capacity. The additional general purpose lanes - two in each direction will with the hov improvements and additional busses scheduled provide a workable plan	Thank you for your comment.
E53	TR	1	Scott Kaseburg 5443 Pleasure Point Lane SE Bellevue, WA 98006 scott.l.kaseburg@boeing.com Agency: Public	I attended the public meeting on 9/19/2001 and heard a number of references to utilizing the train route along Lake Washington for potential light rail, bus routes, and bicycle paths. As I understand it, any of these options would require discontinuing the rail line as their use is incompatible.	Not necessarily. The right-of-way currently is wide enough for multiple uses.
E53	ECON	1	Scott Kaseburg 5443 Pleasure Point Lane SE Bellevue, WA 98006 scott.l.kaseburg@boeing.com Agency: Public	It should be noted that deactivating this rail line would be of significant impact to the Boeing Renton facility. We currently receive the entire 737 fuselage via rail car, as well as the forward section of the 757. This comes to us from Wichita; the line crosses under I-405 at Totem Lake and ends at the Renton Dinner Train station. I'm unaware of any other rail routes that would be available if this line was deactivated.	It has not yet been determined if light rail, bus, and pedestrian access would preclude freight along this rail line. There may also be other freight routes or other transport alternatives that could meet the needs of the Renton Plant in the event that freight access was precluded.
E53	TR	2	Scott Kaseburg 5443 Pleasure Point Lane SE Bellevue, WA 98006 scott.l.kaseburg@boeing.com Agency: Public	Furthermore, we have announced that we will be fabricating more of the 757 fuselage in Wichita which will increase our need for this transportation. Due to the size of both fuselages, I don't see as to how over-the-road transportation would be possible.	Thank you for your comment on use of the BNSF for Boeing freight movements.

Code Number			Name	Comment	Response
E54	ECON	1	Ben D. Wilson ben.wilson@wgint.com Agency: Public	Recently I visited our office in Bellevue. I was shocked and dismayed to see the traffic on I-405. The lost time and economic impact on the eastside is tragic, and unnecessary.	Thank you for your comment.
E54	SOL	1	Ben D. Wilson ben.wilson@wgint.com Agency: Public	Widen and improve I-405 now! Nothing has a higher priority.	Thank you for your comment.
E55	ALT	1	David Luckman 4648 89th Sve SE Mercer Island, WA 98040 LuckmanKaren@aol.com Agency: Public	I strongly support Alternative 4 - general capacity emphasis. This option will provide the most cost effective solution to improving congestion in the I-405 corridor.	Please see response to comment L30.ALT-1.
E55	O	1	David Luckman 4648 89th Sve SE Mercer Island, WA 98040 LuckmanKaren@aol.com Agency: Public	It has been shown that commuters will not abandon their cars, so it is a waste of tax dollars to pursue mass transit solutions (especially alternatives 1 and 2). Mass transit solutions often involve spending billions of dollars with very little to show for it (Sound Transit is a case in point).	Thank you for your comment regarding transit. The Preferred Alternative includes a balance of roadway and transit investment.
E56	ALT	1	Craig A Foreman cforeman@pclient.ml.com Agency: Public	I support Alt 3 for the I405 project. I feel it is the most bang for the buck.	Please see response to comment L12.ALT-1.
E56	O	1	Craig A Foreman cforeman@pclient.ml.com Agency: Public	I have a big concern that we will not do enough to fix this problem. We need to do it right the first time!!	Thank you for your comment.
E57	O	1	Marc Auerbach 927 N. 91st Street Seattle, Washington 98103-3909 marc587@home.com Agency: Public	I am opposed to the DOT preferred alternative for I-405. Why? It is too expensive. It will promote more sprawl, damage neighborhoods, and, ultimately, fail to solve the problems it seeks to address.	Please refer to the response to comment E66.SOL-1.

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E57	TR	1	Marc Auerbach 927 N. 91st Street Seattle, Washington 98103-3909 marc587@home.com Agency: Public	More pavement will ultimately lead to more car travel, just continuing the vicious cycle.	Please refer to the response to comment E66.SOL-1.
E57	SOL	1	Marc Auerbach 927 N. 91st Street Seattle, Washington 98103-3909 marc587@home.com Agency: Public	We need to use the space we have more efficiently -- with a mix of targeted road improvements and high capacity transit.	Thank you for your comment.
E57	SOL	2	Marc Auerbach 927 N. 91st Street Seattle, Washington 98103-3909 marc587@home.com Agency: Public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E57	O	2	Marc Auerbach 927 N. 91st Street Seattle, Washington 98103-3909 marc587@home.com Agency: Public	The voters of King County overwhelmingly rejected Initiative 745, but Alternative 3 revives the misguided spirit of that initiative. We can and must do better.	Thank you for your comment.
E58	ECON	1	Mary Portlock maryp@johnlscott.com Agency: Public	Delays in transportation, no matter what the mode is affects us all. It costs money no matter what. The questions to ask is what is the result desired from the cost. To improve our economy? Or not improve our economy. Either way it costs,	Thank you for your comment.
E58	O	1	Mary Portlock maryp@johnlscott.com Agency: Public	please take swift and immediate action for improving our transportation needs. We cannot afford to waste anymore time and money.	Thank you for your comment.
E59	SOL	1	Atley Ralston Kirkland a.ralston@verizon.net Agency: Public	I believe we must increase our bus service everywhere in Greater Puget Sound. We need enough comfortable buses that it onvenient and pleasant for us to take them. I use them now when I can but many times they are too infrequent or they do not go to my destination without transfer (i.e Kirkland to Seattle Center).	Each of the action alternatives includes an increase in transit service ranging from 50 percent up to 100 percent.

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E59	ALT	1	Atley Ralston Kirkland a.ralston@verizon.net Agency: Public	Therefore I vote for alternative #1 as the choice that most closely fits my ideas.	Please see response to comment E15.ALT-1.
E59	O	1	Atley Ralston Kirkland a.ralston@verizon.net Agency: Public	We need to discourage single occupant autos, so no new general purpose lanes.	Thank you for your comment.
E60	SOL	1	Sheila J Dwyer sheila.j.dwyer@Boeing.com Agency: Public	My comment or suggestion is that we get rid of the HOV lanes so we can all use the lanes; or let the HOV lanes be open to all on the weekends. Another suggestion is that if we let the HOV lanes be open on the weekends, we can do away with the long lines taking the Auburn, Kent exit, that slow everyone else up.	Please see response to comment E46.TR-2.
E60	SOL	2	Sheila J Dwyer sheila.j.dwyer@Boeing.com Agency: Public	I do not think we need to put more money into transit.	Thank you for your comment.
E60	SOL	3	Sheila J Dwyer sheila.j.dwyer@Boeing.com Agency: Public	We need to take care of our roads and quit doing the road work during the day creating long lines, etc.	Thank you for your comment.
E60	TR	1	Sheila J Dwyer sheila.j.dwyer@Boeing.com Agency: Public	Also need to make 520 a 2 person, one signs says 2 person, another says 3.	HOV usage is based on state policy that relates the number of occupants to the average travel speed on the freeway. SR 520 is HOV 3 west of I-405 due to safety and operational concerns.
E61	TR	1	Manuel Schmitt mgschmitt@hotmail.com Agency: Public	Short point on pedestrian accomodation at freeway exchanges: it is imperative that the on and off ramps be designed to be easily and safely crossed by pedestrians. I ventured across 405 today at NE 8th in Bellevue, and the pedestrian accomodations are a joke - at least there are sidewalks and wheelchair notches, but there is zero signaling, even when there are two very wide lanes to be crossed. I wonder what it's like at night... At least on 520 (Bellevue Way and 148th come to mind), there is some signaling for cars to point out that pedestrians might cross the road	Several nonmotorized crossing improvements are included in the Preferred Alternative. These improvements include widened sidewalks, bike lanes, and signing. The details of these improvements will be determined during the project design process.

Code Number			Name	Comment	Response
E62	SOL	1	Alan Borning 5735 Woodlawn Ave N Seattle, WA 98103 borning@speakeasy.org Agency: Public	I urge you to fully analyze Alternative 5 as proposed by Sensible Solutions for 405. This is a more realistic and cost-effective solution than the alternatives presented already.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E63	O	1	Mark Minickiello P.O. Box 731854 Puyallup, WA 98373 mminickiello@waleague.org Agency: Public	I oppose any improvements to I-405 that those of us living outside of King County would be required to pay for.	Thank you for your comment.
E64	SOL	1	Tom Buergel 7236 121 Place SE Newcastle WA 98056 bergs30@home.com Agency: Public	The largest problem in my mind is the access ramp at SR 167. When cars have to cross each other to get on and off the freeway, it causes back ups. In SR 167, it backs it up almost everyday, all the way to Renton or further. Please put the initial focus and money into fixing this problem, and other ramps that have similar challenges.	Substantial improvements to the interchange with SR 167 is included in all Alternatives.
E65	O	1	Mark & Karen Carton 21st Legislative District MarkCarton@home.com Agency: Public	We have lived in the north end of Seattle and Kirkland area all of our life's. We have witnessed mass transit's dismal attempt to relieve traffic congestion. Mass transit will move people who are going where mass transit goes only if it's convenient.	Thank you for your comment.
E65	O	2	Mark & Karen Carton 21st Legislative District MarkCarton@home.com Agency: Public	The rest of us who pack the tools of our trades or go routinely where transit doesn't go or when it doesn't go there deal with the hours of delay every day. If bad weather sets in the delay is worse. Buses and rail will not fix that problem!	Thank you for your comment.
E65	SOL	1	Mark & Karen Carton 21st Legislative District MarkCarton@home.com Agency: Public	Please help the tax payers and voters get to work as well as drive to our personal lives away from the "corridors" by expanding our freeway system. Now is the time.	Thank you for your comment.

Code Number			Name	Comment	Response
E65	O	3	Mark & Karen Carton 21st Legislative District MarkCarton@home.com Agency: Public	Please support the I 405 committee recommendation and give us more pavement.	Thank you for your comment.
E66	SOL	1	Please see the pages that follow for a list of the parties who submitted this comment.	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl. I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	Please see the response following the list of submitters.

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Response to E66.SOL-1
Introduction

Duplicate comments responding to the DEIS for the I-405 Corridor Program were received from over 1,000 individuals. The comments read as follows: "WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl. I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides."

The following discussion responds to those comments in detail. "Alternative 5" was a proposal advanced by the Sensible Solutions for 405 organization. Because there is no official "Alternative 5" in the DEIS, the alternative is referred to as the "Sensible Solutions proposal."

Background on I-405 Corridor Program Purpose and Need

The selection of the Preferred Alternative was based upon a thorough analysis of its transportation performance and environmental effects in meeting both the need and purpose for the I-405 Corridor Program. The transportation need identified for the I-405 Corridor Program is:

> To improve personal and freight mobility and reduce foreseeable traffic congestion in the corridor that encompasses the I-405 study area, from Tukwila to Lynnwood, in a manner that is safe, reliable, and cost-effective.

The purpose of the I-405 Corridor Program is to provide an efficient, integrated, and multi-modal system of transportation solutions within the corridor that meets this need in a manner that:

- Provides for maintenance or enhancement of livability for communities within the corridor;
- Provides for maintenance or improvement of air quality, protection or enhancement of fish-bearing streams, and other regional environmental values such as continued integrity of the natural environment;
- Supports a vigorous state and regional economy by responding to existing and future travel needs; and
- Accommodates planned regional growth.

The Preferred Alternative is a multi-modal solution to the transportation needs in the I-405 corridor that is very similar to Alternative 3, Mixed Mode Emphasis.

Alternatives Development and Selection

Beginning with a broad range of transportation and mobility strategies, the environmental review process narrowed the range of alternatives to the four multi-modal solutions evaluated in the I-405 Corridor Program Draft EIS. Strategies that examined only one modal element - such as transit only, freeway only, or arterial only - were not judged to meet the purpose and need of the I-405 Corridor Program. At one extreme, a roads-heavy strategy was studied that included substantially more arterial and freeway lane miles than Alternative 3. Another strategy looked at avoiding actions in the I-405 corridor by building new freeway capacity in another corridor to the east of I-405. These strategies were screened out by the Citizens, Steering, and Executive committees as being not fully responsive to the program's purpose and need. The resulting multi-modal alternatives (i.e., Alternatives 1 through 4) were the focus of detailed evaluation and scrutiny within the Draft EIS.

The Preferred Alternative is a multi-modal solution to the transportation needs in the I-405 corridor that is very similar to Alternative 3, Mixed Mode Emphasis. The selection of the Preferred Alternative was based upon a thorough analysis of its transportation performance and environmental effects in meeting both the need and purpose for the I-405 Corridor Program. Alternative 3, Mixed Mode Emphasis, was selected as the basis for the Preferred Alternative by consensus of the three study committees for the following primary reasons:

- Transportation performance was superior in relationship to the study committees' evaluation criteria;
- Environmental effects within the corridor could be avoided, minimized, mitigated, or even enhanced through sound design practices and a "watershed" or "basin-level" approach to examining key environmental features;
- Comparison of program benefits to costs (addressed separately from the EIS) was the most positive of the alternatives; and
- Mix of modal investments provided a system of balanced roadway, transit, and demand-management/trip-reduction strategies.

Focus of Preferred Alternative and Sensible Solutions Proposal

The following table compares the proposed transportation improvements contained in the I-405 Corridor Program Alternative 3 (Mixed Mode Emphasis), the Preferred Alternative, and the Sensible Solutions proposal. The Sensible Solutions proposal is based upon information received from the group in September 2001. A modified "Phase One" proposal was submitted via letter to the I-405 Corridor Program Steering Committee on February 12, 2002.

Comparison of Key Elements in Alternative 3 (Mixed Mode Emphasis), the Preferred Alternative, and the Sensible Solutions Proposal

MAJOR ELEMENTS	Alt. 3 Mixed Mode Emphasis	Preferred Alternative	Sensible Solutions Proposal	Comments on Preferred Alternative	Comments on Sensible Solutions Proposal
TRANSPORTATION DEMAND MANAGEMENT					
TDM Package	Yes	Yes	Yes		Contains more seed money for transit-oriented development (TOD) than Alternative 3 or the Preferred Alternative
Expanded TDM Package (Regional pricing through PSRC)	No	Yes	Yes	Contingent upon adopted regional pricing policy	Generally supportive
TRANSIT and HOV					
Transit Expansion Within Study Area	Yes (up to 100%)	Yes (up to 75%)	Yes (up to 100%)	Expansion limited to around 75% based on demand	
High Capacity Transit (HCT) - Fixed Guideway	No	No	No	Accommodates future planning for expanded HCT in central core	

MAJOR ELEMENTS	Alt. 3 Mixed Mode Emphasis	Preferred Alternative	Sensible Solutions Proposal	Comments on Preferred Alternative	Comments on Sensible Solutions Proposal
High Capacity Transit (HCT) - Commuter Rail	No	No	Yes		Originally proposed within BNSF alignment, but deleted in Phase One proposal after original proposal was evaluated in this response
High Capacity Transit (HCT) - Bus Rapid Transit	Yes	Yes	Yes		Focused on arterials, but not specifically defined
Arterial HOV Priority	Yes	Yes	Yes		Similar to Alternative 3 and the Preferred Alternative
HOV Express on I-405 With Direct Access Ramps	Yes	Yes	Yes (reduced scope)		Limited investment in freeway-to-freeway ramps only
Add Park-and-Ride Capacity to Match Demand	Yes	Yes	Yes		Similar to Alternative 3 and the Preferred Alternative
Add Transit Center Capacity to Match Demand	Yes	Yes	No		
FREEWAY					
Basic I-405 Improvements	Yes	Yes	Yes	Committed projects plus hill-climbing lanes	Includes most basic improvements
Add 1 General Purpose Lane Each Direction on I-405	No	No	Yes		1 lane added south of I-90 (north of I-90 includes basic I-405 improvements only)
Add 2 General Purpose Lanes Each Direction on I-405	Yes	Yes	No	Up to 2 through-lanes added	
Add 2 Express Lanes Each Direction on I-405	No	No	No		
Provide Collector-Distributor Lanes on I-405 Where Needed	Yes	Yes	No	Up to 2 collector-distributor lanes added	
Widen SR 167 by 1 Lane Each Direction to Kent (Study Area Boundary)	Yes	Yes	Yes	Up to 2 lanes south to 180th (no widening south of 180th)	

MAJOR ELEMENTS	Alt. 3 Mixed Mode Emphasis	Preferred Alternative	Sensible Solutions Proposal	Comments on Preferred Alternative	Comments on Sensible Solutions Proposal
SR 167 / I-405 Interchange Improvements	Yes	Yes	Yes (reduced scope)		Partial interchange reconstruction only
Improve Connecting Freeway Capacity to I-405	Yes	Yes	No		Exception is SR 167 (see above)
ARTERIAL					
Implement Planned Arterial Improvements	Yes	Yes	Yes		Contains fewer projects than Alternative 3 or the Preferred Alternative
Expand Capacity on North-South Arterials	Yes	Yes	Yes (reduced scope)	Contains all arterials included in Alternative 4	Contains limited arterial projects
Upgrade Connecting Arterial Connections to I-405	Yes	Yes	No		
NON-MOTORIZED					
Corridor Pedestrian and Bicycle Improvements	Yes	Yes	Yes (reduced scope)		Contains fewer projects than Alternative 3 or the Preferred Alternative
INTELLIGENT TRANSPORTATION SYSTEMS					
Corridor Intelligent Transportation System Improvements	Yes	Yes	Yes		Similar to Alternative 3 and Preferred Alternative
FREIGHT					
Corridor Freight Enhancements	Yes	Yes	Yes (reduced scope)		Limited truck geometric improvements only
PRESERVE BNSF RIGHT-OF-WAY					

MAJOR ELEMENTS	Alt. 3 Mixed Mode Emphasis	Preferred Alternative	Sensible Solutions Proposal	Comments on Preferred Alternative	Comments on Sensible Solutions Proposal
Preserve BNSF Right-of-Way for Future Transportation use	No	No	Yes	Letter of support for preservation sent to appropriate agencies by Executive Committees	Generally supportive
MANAGED LANES					
Manage Up to 2 Lanes Each Direction	No	No	Yes	Accommodates future planning for expanded managed lanes in corridor	Generally supportive
Managed lanes: Utilize Tolls as Management Tool	No	No	Yes	Accommodates future tolls contingent upon adopted regional pricing strategy (see Expanded TDM Package above)	Generally supportive

In addition to added roadway capacity on I-405 and in key arterial corridors, the Preferred Alternative includes a substantial expansion of transit service throughout the Eastside and the implementation of a bus rapid transit (BRT) system serving the entire corridor. The transportation demand management (TDM) element of the Preferred Alternative represents one of the most extensive corridor-based demand-management/trip-reduction programs considered in the United States.

The need for the magnitude of transportation investment reflected in the Preferred Alternative originates in planned growth in population and employment in the region that is projected to result in a 56 percent increase in corridor daily person-trips by 2020 (I-405 DEIS; PSRC Travel Forecast model). This growth is fully accounted for in the travel forecasts along with the major effects of what is termed "induced travel" by Sensible Solutions. As described in this response, any unaccounted-for induced travel is likely to be very small. The I-405 corridor is not a situation in which a small-scale investment in any single mode can be expected to accommodate the growth in travel that will occur within the study area, even with the substantial investment in transportation demand management and trip reduction programs like that contained in the Preferred Alternative and Sensible Solutions proposal.

The recommendations contained in the Sensible Solutions proposal are consistent with the range of alternatives evaluated in the Draft EIS and have many elements in common with Alternative 3, Mixed Mode Emphasis. Sensible Solutions' transit service costs are the same as those in Alternative 3. The proposal also includes several of the arterial projects contained in Alternative 3 and Alternative 4, General Capacity Emphasis. Sensible Solutions acknowledges that key freeway improvements must be made, although they propose a much smaller freeway investment similar to elements evaluated in Alternative 1, High-Capacity Transit/TDM Emphasis, and Alternative 2, Mixed Mode with High-Capacity Transit/Transit Emphasis.

The Sensible Solutions proposal omits several key components of a more balanced I-405 corridor solution. In particular, the proposal fails to include completion of the HOV system in the corridor. Freeway-to-freeway HOV connections along the I-405 corridor are essential to serving the large carpool and vanpool volumes anticipated, and will serve a vital function in the proposed BRT system by maintaining the flow of express buses separate from the general traffic lanes. The Sensible Solutions proposal would fund only a small portion of these HOV improvements.

Despite the investment in transit and HOV improvements proposed as part of the Preferred Alternative, Section 3.12 of the EIS documents the need for expanded general traffic capacity to meet the stated program need of reducing foreseeable traffic congestion. The Sensible Solutions proposal would not produce any meaningful congestion reduction.

Response to Specific Comments of Sensible Solutions and Others

The following response provides an in-depth discussion of each of the four "fatal flaws" arguments made with respect to Alternative 3, Mixed Mode Emphasis. The response demonstrates that the Sensible Solutions claims are not supported by the documented environmental studies embodied in the Draft EIS or by sound planning judgment. The response does support the conclusion that the Sensible Solutions proposal can be viewed as a possible strategy for implementing an initial stage of the broader I-405 vision. In fact, many of the Sensible Solution proposals are consistent with a phased implementation approach being developed by WSDOT and the I-405 partner agencies. Finally, the response places the Sensible Solutions proposal into context of the alternatives studied in the I-405 Corridor Program EIS.

Comment: WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic.

The I-405 Corridor Program EIS acknowledges that induced travel occurs in response to improvements in accessibility. The forecasting conducted for the EIS analysis explicitly includes the major induced demand factors cited in published literature. These include changes in trip patterns, trip lengths, and mode shares. Of the remaining factors (e.g., changes in trip generation or temporal shifts), there is no clear research that documents the magnitude of those effects.

While a number of researchers draw conclusions regarding the potential effects of added capacity (e.g., lane miles) on induced travel, there are many other factors (population changes, income, gasoline prices) that complicate any research findings in this area. The oft-cited Hansen and Huang research acknowledged, "As expected, population growth emerges as a major determinant of VMT [vehicle miles traveled]" (Hansen, p. 213). For example, they noted that trend analysis of California urban areas from 1977 to 1990 showed that around 40 percent of total changes in VMT (on state highways only) was caused by general population changes in the region (Hansen, Figure 3, p. 216). Conversely, lane mile changes were found to account for 8 percent of the VMT effects, with "other" factors accounting for 52 percent of the effects.

Another area of recent focus has been the Texas Transportation Institute (TTI) statistics on congestion levels in major metropolitan areas around the country. The most cited reports include, "Easing the Burden: A Companion Analysis of the Texas Transportation Institute's Congestion Study", May 2001, by the Surface Transportation Policy Project (STPP), and "Breaking the Gridlock: Real Solutions for Transportation Problems", September 2000, by WashPIRG. Both of these reports utilize portions of the TTI database to examine relationships between changes in population, lane miles, and congestion. Review of the underlying TTI data and discussions with TTI staff showed relatively weak relationships between various indicators of added capacity (e.g., lane miles, lane miles per capita) and congestion (e.g., the TRI index in the TTI studies). There also appeared to be no meaningful correlation between change in population and congestion. While these reports did a credible job of extracting and analyzing certain data for the purposes of their research, it is also clear that there are many confounding factors within the TTI database that could also lead to other conclusions.

Depending upon the phasing of roadway and transit improvements in the Preferred Alternative, there may be a period of time immediately after construction during which the addition of transportation capacity precedes the effects of growth within the study area and region. In this event, it is reasonable to expect a temporary, short-term shifting of traffic patterns and modes that reflect the improved mobility that is provided. However, since the I-405 transit and TDM strategies are expected to be implemented as early actions during and after the construction period, the effects of short-term induced travel are likely to be minimized.

Many of these research studies try to draw simple correlations between growth in travel and growth in highway capacity; however, the strength of these correlations is unclear when the data are examined closely. Thus, while simple correlations of these two variables may exist, this does not necessarily mean that highway capacity changes cause growth in travel.

The overall effects of induced demand are expected to be limited within the I-405 study area for the following reasons:

- Growth in population and employment between 1995 and 2020 is expected to increase daily travel demand by over 50 percent. This growth will leave minimal available capacity to generate additional induced demand. The effects of substantial travel growth also complicate any conclusions regarding the effects of induced demand.
- The number of hours of congestion is expected to improve with respect to current levels under the Preferred Alternative. However, congestion will still persist during the peak hours due to the large amount of background travel growth. This effect will provide limited incentives for persons to generate additional peak-period trips or to shift travel to the peak hours.
- Growth management policies and adopted land use and transportation plans within the study area and region will limit shifting of land use patterns and resulting trip-making in response to the I-405 Corridor Program improvements.

Given the 20- to 30-year horizon for the I-405 Corridor Program, any effects of induced demand that are not already captured in the travel forecasts are expected to be small in the context of overall corridor growth. Such effects could be reduced entirely by the implementation of the proposed aggressive TDM program, whose effects were not explicitly included in the travel forecasts. Please also refer to Section 3.12 of the I-405 Corridor Program Final EIS and to the addendum to the I-405 Corridor Program Transportation Expertise Report for additional discussion of trip generation and induced travel demand.

Comment: 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic.

The need for major transportation improvements on the east side of Lake Washington is well documented. I-405 serves as the backbone transportation system for nearly 20 percent of the four-county Puget Sound region's population. Traffic congestion lasts up to 12 hours a day in some areas. The I-405 corridor population and employment growth are planned to increase by over 35 percent during the next 20 years. By 2020 an additional 144,000 people are forecast to be employed within the study area, while the population is expected to reach approximately 765,000. This growth will result in an increase of more than 50 percent in person trips. The existing transportation system is inadequate to handle this increase in demand. Puget Sound Regional Council's Metropolitan Transportation Plan, *Destination 2030*, acknowledges the need for major transportation improvements not only within the I-405 corridor, but also throughout the region.

The I-405 Corridor Program calls for a 20-year program of transit, roadway, and environmental investments that were developed through the recommendations of the Citizen, Steering, and Executive committees, including elected officials, local agency experts, and representatives from businesses and community groups. Improvements contained in the Preferred Alternative are a substantial portion of the Eastside's transportation program within the 250-square-mile study area for the next 20 years. The Preferred Alternative includes nearly 150 specific multi-modal projects and actions that will be the responsibility of the state, regional, and local governments to fund and implement. These improvements will assure the mobility of transit and freight vehicles as well as improving traffic flow for automobiles.

The Preferred Alternative is estimated to cost $7.8 billion in year 2002 dollars. Costs include about $5.5 billion for roadway improvements and $2.3 billion for transit, HOV, and non-motorized improvements. Environmental mitigation costs are included in the estimates. By comparison, Sensible Solutions recommended an alternative that cost $3.1 billion in year 2000 dollars, with $1.45 billion for roadway improvements and $1.65 billion for transit, HOV, and non-motorized.

Currently, the four-county region is spending about $2 billion in public revenues annually for transportation investments. Sources include federal, state, regional, and local funding. Sound Transit, as approved by the voters in 1996, is generating revenues within the I-405 Corridor Program study area that must be spent in the area where generated. Sound

Transit revenues, if continued by approval from voters, could fund approximately $1billion of the transit elements proposed in the Preferred Alternative. The cities and counties will be expected to fund a majority of the planned arterial improvements. Funding for I-405 and other state routes will require federal, state, and regional revenues and may require approval by the voters.

Locally and nationally, projects of similar magnitude and benefit have been funded and implemented. Voters in the Puget Sound region demonstrated willingness in 1996 to support the $4 billion, 10-year Sound Move program that was primarily focused on transit improvements. Boston is completing the "Big Dig" that is estimated at $14 billion, Denver has started construction on their $1.6 billion T-Rex project, and Salt Lake City recently completed construction on the $1.5 billion I-15 expansion project in time for the winter Olympics.

Comment: 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets.

By 2020, under No Action conditions, traffic volumes will increase on arterial streets throughout the study area. Average trip lengths on many arterials will increase, indicating that many additional regional trips will seek to use the arterial street system as an alternative to an increasingly congested network of freeways. For example, average trip lengths on 148th Avenue NE in Bellevue are forecasted to increase from 14 miles (in 1995) to 21 miles (in 2020). At this location, about one-third of all trips are estimated to be traveling over 30 miles. Similar results were evident along SR 202 between Redmond and Woodinville. While average trip lengths would not be reduced with Alternative 3, a higher proportion of the longer trips would occur on I-405 rather than arterial and local streets.

As described in Section 3.12 of the I-405 Corridor Program Draft EIS, traffic impacts in neighborhoods would be reduced by the addition of capacity on I-405. The proportion of persons traveling on I-405 in a north-south direction within the corridor would increase from around 50 percent under No Action to 65 percent under the Preferred Alternative. This results in less traffic on arterial streets.

Sensible Solutions asserts that improved I-405 capacity would result in greater total travel on arterials and neighborhood streets since people would travel "out of direction" to gain access to I-405. This claim is not supported by the travel forecast results. As shown in the following table, total daily vehicle miles of travel (VMT) would decrease on the arterial and local street system as additional freeway capacity is added to the system. Alternative 3 would result in a 7 percent reduction in arterial VMT compared to the No Action Alternative. The Preferred Alternative findings showed similar trends compared with the other action alternatives. In comparison, Alternatives 1 and 2, which are similar to the Sensible Solutions proposal, would show less improvement in arterial and local street traffic volumes.

Comparison of Daily Vehicle Miles of Travel in Year 2020

Roadway Classification	No Action Alternative (Million VMT daily)	Alternative 1 (Million VMT daily)	Alternative 2 (Million VMT daily)	Alternative 3 (Million VMT daily)	Alternative 4 (Million VMT daily)
I-405	3.95	3.94	5.44	6.71	7.55
Other Freeways	5.28	5.28	5.75	5.80	5.80
Arterial and Local Streets	8.89	8.88	8.50	8.31	8.27
Total	18.12	18.10	19.69	20.82	21.62

Source: I-405 Corridor Program Draft Transportation Expertise Report (Tables 4-9, 4-22, 4-35, 4-48, and 4-60).
Note: VMT is for Freeways and Arterials within study area.

Traffic studies indicate that volumes on the north-south arterials parallel to I-405 would decrease by about 10 percent in year 2020 from the No Action condition under Alternative 3, Mixed Mode Emphasis. Some arterials exhibited even larger traffic reductions. For example, traffic volumes on 140th, 148th, and 156th Avenues NE in Bellevue were shown to be reduced by around 25 percent on a daily basis. In Kirkland and Redmond, the 124th Avenue, Willows Road, and SR 202 corridor volumes would decrease by a similar amount, even assuming the extension of Willows Road north to Woodinville. In Tukwila, volumes on SR 181 would decrease by 15 to 20 percent compared to No Action due to the improvements on SR 167 and I-405. As a result, Alternative 3 and the Preferred Alternative would reduce the traffic in neighborhoods and on local streets that are currently being used as overflow travel alternatives to I-405.

Despite the overall decrease in traffic on arterials and neighborhood streets, the Draft EIS documents that traffic volumes would increase on the east-west arterials connecting to a widened I-405 freeway. For example, Alternative 3 shows a 10 to 15 percent increase on east-west streets in the Totem Lake area of Kirkland. In response, Alternative 3 and the Preferred Alternative include several elements to improve capacity on arterial streets such as NE 116th, NE 124th, and NE 132nd approaching I-405. These improvements will encourage traffic to use the arterial street system rather than neighborhood streets. In contrast, east-west volumes in the central part of Kirkland showed only minor changes. Throughout the study area, the major freeway connectors such as SR 522, SR 520, and I-90 are attracting much of the east-west volume that will provide improved access to I-405.

Comment: 4) It will increase noise, air and water pollution and worsen sprawl.

Noise:

As described in Section 3.2 of the I-405 Corridor Program Draft EIS, under Alternative 3 without mitigation, nearly 2,500 residential properties would be within the potential noise impact area. Potential effects of the Preferred Alternative would be similar to Alternative 3. Under the Sensible Solutions proposal, the number of residential parcels potentially affected by traffic noise before mitigation would be similar to Alternative 1, HCT/TDM Emphasis, at about 1,730 (see Table 3.2-9 in the EIS). However, an added number of parcels (estimated at approximately 200 [see Table 3.2-11 in the EIS] based on the similarity of the Sensible Solutions proposal to the transit system evaluated under Alternative 1) would be affected by noise from Sensible Solutions' proposed commuter rail or other high-capacity transit use along the BNSF right-of-way. As with all of the alternatives evaluated in the EIS, the actual number of affected parcels would be reduced by mitigation implemented as part of any alternative (see Section 3.2.5 of the EIS).

Air:

As described in Section 3.1 of the I-405 Corridor Program EIS, air pollutant emissions in the Puget Sound Region were calculated using Puget Sound Regional Council (PSRC) methods for each of the alternatives. Regional emissions for each of the alternatives evaluated in the Draft EIS for the I-405 Corridor Program were modeled using a methodology and assumptions consistent with the 1998 MTP update. The analysis methodology included the cumulative effects on transportation emissions of planned transportation improvements throughout the central Puget Sound region. Emissions under Alternative 3 would be less than under the No Action Alternative as a result of reduced congestion and reduced travel time in the region due to decreased system delay. Potential effects of the Preferred Alternative would be similar to Alternative 3, which has been shown by PSRC to result in regional air pollutant emissions that are within the regional pollutant budget for 2030 (see Section 3.1.4.6 of the Final EIS).

While no values are available for the Sensible Solutions proposal, it would likely operate with similarities to Alternative 1 and Alternative 2, Mixed Mode with HCT/Transit Emphasis. Both of these alternatives would result in higher pollutant emissions in the region than Alternative 3 and the Preferred Alternative, but would likely also be within the regional emission budget. Therefore, the Sensible Solutions proposal would be expected to have slightly higher pollutant emissions than Alternative 3.

Construction air pollutant emissions would occur under all action alternatives and the Sensible Solutions proposal. Under the Preferred Alternative there would be somewhat greater overall construction-related emissions in the I-405 corridor than under the Sensible Solutions proposal. The Sensible Solutions proposal would likely have greater localized emissions in the high-capacity transit corridor (see Section 3.1.4 of the FEIS).

Water pollution:
The cumulative impacts discussion for surface water documents that the overall quality of water resources in the study area is likely to continue to decline because of the extensive additional planned development. Please refer to Section 3.23.4.3 of the Draft EIS. For instance, the amount of impervious area within the study area is projected to increase by more than 10,000 acres over the next 20 years. This development would increase impervious area coverage of the study area from the current 36 percent to 41 percent by 2020. Even with increased stormwater management requirements for this new development, further degradation of water resources may be unavoidable.

As described in Section 3.5.4.4 of the I-405 Corridor Program Draft EIS, Alternative 3 would result in substantial short-term construction impacts to ten stream basins. Substantial long-term impacts to base flow would occur within two stream basins before accounting for mitigation. However, water quality treatment would be provided for all new road surfaces and much of the adjacent, existing road pavement. The latter currently receives no treatment along many locations of the roadways; thus, the alternative would result in a net improvement in runoff water quality.

The potential effects of the Preferred Alternative would be similar to Alternative 3. Based on its similarity to Alternative 2, the Sensible Solutions proposal would likely substantially impact approximately 11 stream basins during construction. Long-term impacts are also likely, which would be similar to the effects of Alternative 2 (approximately 6 basins with base flow impacts without mitigation). Environmental enhancements along I-405 under the action alternatives would occur throughout the length of the constructed transportation improvements, and would include upgrading of stormwater facilities to meet current requirements and other enhancements necessary to meet requirements under the Endangered Species Act. WSDOT is committed to implementing an early-action mitigation program. Under this program, environmental enhancement projects for streams and wetlands would be funded and carried out in the near term, ahead of many of the project impacts. These mitigation actions are intended to provide a net environmental benefit to the region before and after project completion.

Sprawl:

Sprawl is a difficult term and concept to define, with many agencies and private foundations each creating unique definitions for the term. For discussion purposes, two definitions are identified below.

The *Washington State Growth Management Program - Issues in Designated Urban Growth Areas, Part I*, March 1992, defines sprawl as:

> Scattered, poorly planned urban development that occurs particularly in urban fringe and rural areas and frequently invades land important for environmental and natural resource protection. Urban sprawl typically manifests itself in one or more of the following patterns:
>
> - Leapfrog development, where new development is several parcels away from an existing urban area, bypassing vacant parcels located in or closer to the urban areas that are suitable for development;
> - Strip development, where large amounts of commercial, retail, and often multifamily residential development are located in a linear pattern along both sides of a major arterial and typically accessing directly onto the arterial; and
> - Large expanses of low density, single-family type development.

The organization 1000 Friends of Washington defines sprawl in its *Sprawl Report Card*, December 1999, as:

Unplanned development that:

- Uses land inefficiently;
- Forces residents to depend on the automobile almost exclusively for transportation;
- Has inadequate open space amenities, such as parks and stream corridors; and
- Does not include a balance of jobs and affordable housing.

The key reference in both definitions is to development that is "poorly planned", or "unplanned." This recognizes that historically, sprawl in Washington has taken place in a haphazard manner, with minimal planning or policy guidance. Additionally, the state definition alludes to the automobile in arterial-oriented development patterns, and the 1000 Friends definition specifically references exclusive use of the automobile. Both definitions are correct in noting the increased dependence on the automobile as it relates to sprawl. In 1990, Washington gained national recognition when it adopted the Growth Management Act (GMA) to reduce and eliminate sprawl-type development that was increasingly threatening rural communities, environmentally sensitive areas, and vital resource lands. The GMA attempts to focus growth and efficient types of development within the designated urban growth areas by emphasizing a strong, multi-tiered approach that integrates land use and transportation planning and supports effective multimodal transportation solutions.

Prior to 1990, Washington's land use and environmental laws were a patchwork of regulations enacted over a period of 100 years, i.e., a constitution written to address the problems of the 1880s, planning-enabling laws adopted in the 1930s, and environmental acts passed in the 1970s. In 1990, the State Legislature adopted the Growth Management Act (GMA) as the framework for managing growth in a manner that is both coordinated and comprehensive. At about the same time, the Puget Sound Regional Council (PSRC) adopted *VISION 2020*, which included the Metropolitan Transportation Plan (MTP), the region's first integrated, long-range growth and transportation strategy. In 2001 the MTP was updated and re-named *Destination 2030*. The I-405 Corridor Program Preferred Alternative improvements are included as a part of the adopted transportation strategies contained in the *Destination 2030*. Please refer to Section 3.13.2 of the Final EIS for further detail.

The four-county Puget Sound region, in accordance with the GMA, has defined rural and urban areas with the implementation of the Urban Growth Boundary and urban growth areas. The region also has established goals and policies to protect sensitive areas and overall natural resources, and has adopted a regional approach to integrated land use and transportation planning. These are steps taken in an effort to manage growth and reduce sprawl on a regional level. At the local level, the counties and cities in the Puget Sound region have designated and planned where growth and development will be accommodated within their boundaries along with supportive multi-modal transportation systems, and designated Urban Centers to create a balance of jobs, services, housing, and open space buffers to protect natural resources. The key to a well-planned region is implementing these integrated policies and programs at both the local and regional levels. The I-405 Corridor Program Preferred Alternative supports this GMA-prescribed approach by advancing implementation of the planned and adopted transportation infrastructure within the study area.

The Preferred Alternative provides the best opportunity to avoid or reduce pressure for unplanned development at the urban fringe or in rural areas outside the Urban Growth Boundary by focusing multimodal transportation investments well within the urban growth area to increase connectivity and mobility within and between the designated Urban Centers, Activity Centers, and Industrial/Manufacturing Centers. These targeted transportation investments also help local jurisdictions and the designated Urban Centers to accommodate planned growth and increase density of households and employment while meeting their requirements under GMA's concurrency guidelines.

Since adoption of the GMA, the Eastside's larger cities, such as Bellevue, Kirkland, and Redmond have transitioned from suburban towns into urban cities. For further details, please refer to Section 3.23 of the Draft EIS. These cities have integrated pedestrian elements, transit service and centers, and downtown high-density residential areas, all creating a desirable and compact urban form. That urban form is supported and called for in the *Destination 2030*. Additionally, King County has seen the incorporation of several new cities in the urban areas, which has led to 64 percent of the population living in incorporated and designated urban growth areas.

Analysis of the alternatives' land use impacts was done through the PSRC's DRAM/EMPAL forecasting model. The results (detailed in Section 3.23 of the Draft EIS) indicate that Alternative 1 is expected to be less effective in achieving the objectives of reducing urban sprawl, encouraging a compact urban form, and increasing urban density than either Alternative 2 or Alternative 3. Detailed tables have been added in Section 3.23 of the I-405 Corridor Program Final EIS to clarify the maps reflecting the potential changes in housing, employment, and population in the I-405 Corridor at 2020 versus the No Action Alternative.

Implementation of the multi-modal transportation system proposed in Alternative 3 or the Preferred Alternative is expected to support a compact urban form for the Eastside cities.

Concurrency:

Concurrency is a provision of the GMA that requires local jurisdictions to deny proposed development if it would cause the transportation level of service to fall below the level-of-service standard adopted in the jurisdiction's comprehensive plan. Under these circumstances, new development can be approved only if the needed transportation improvements or strategies to accommodate the impacts are implemented concurrently with or within six years of the new development. The transportation level of service for concurrency has generally been defined by how long a vehicle waits to pass through an intersection, overall congestion level on a roadway, travel times, or lack of transit, bicycle, and pedestrian facilities. The level-of-service standards for traffic congestion are generally defined using a letter system, from "A", designating free-flow conditions with the least amount of congestion or delay, to "F", designating the greatest congestion or delay.

Alternative 3 and the Preferred Alternative implement many needed elements of the study area transportation infrastructure, but the responsibility for meeting adopted concurrency requirements remains the responsibility of the local government. The I-405 Corridor Program alternatives do not directly solve the concurrency needs of the local jurisdictions, but they do support increased mode choices, mobility, and accessibility to facilities affected by the local concurrency program.

The Preferred Alternative, similar to Alternative 3, would meet the objectives of the GMA, protecting rural areas from urban sprawl and premature development by accommodating urban growth within the designated urban growth area (UGA). The Preferred Alternative helps to achieve this by focusing appropriate transportation infrastructure and mobility improvements within urban centers and the UGA. Please refer to Sections 3.13 and 3.23 of the I-405 Corridor Program Final EIS for additional discussion of the relationship of the Preferred Alternative to land use, development, and transportation within the region and study area. The Sensible Solutions proposal contains only limited arterial improvements and would do little to reduce congestion; therefore, it would not be expected to make a meaningful contribution to addressing concurrency needs in the study area.

Comment: I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405.

The table matrix above compares the proposed transportation improvements contained in the I-405 Corridor Program Alternative 3 (Mixed Mode Emphasis), the Preferred Alternative, and the Sensible Solutions proposal. As can be seen, both Alternative 3 and the Preferred Alternative propose substantial added transit system capacity and mobility improvements, including a new bus rapid transit system throughout the I-405 corridor, new transit centers and park-and-rides, new HOV direct access at transit stations and park-and-rides, and substantial expansion of local and regional express bus service.

The substantial commitment to a mixed-mode solution in the Preferred Alternative is based on the implementing agencies' responsibility to consider long-term (20- to 30-year) solutions that respond effectively to the I-405 Corridor Program purpose and need. Many of the transportation solutions contained in the Preferred Alternative also are contained in the Sensible Solutions proposal at a similar or reduced level; thus, the Sensible Solutions proposal could be viewed as a possible strategy for implementing an initial stage of the broader and longer-term vision for the I-405 corridor. In fact, many of the Sensible Solutions recommendations are consistent with a phased implementation approach being developed by WSDOT and the other implementing agencies. However, the I-405 Corridor Program EIS and supporting data suggest that the Sensible Solutions improvements alone would not adequately meet the long-term need for the I-405 Corridor Program to reduce foreseeable traffic congestion.

The proposal advanced by Sensible Solutions has been examined using existing data and best professional judgment for its likely transportation performance, cost, and environmental effects related to noise, air quality, water, and sprawl-type development, as discussed previously in this response. The Sensible Solutions proposal shares many similarities with Alternative 2, Mixed Mode with HCT/Transit Emphasis, which was evaluated in detail in the I-405 Corridor Program Draft EIS, and the Sensible Solutions proposal's transportation performance and environmental impacts are effectively bounded by the results documented in the I-405 Corridor Program EIS for Alternative 1, HCT/TDM Emphasis, and Alternative 3, Mixed Mode Emphasis. Further, the co-lead agencies have reviewed all public and agency comments and have concluded that the information contained in the I-405 Corridor Program EIS is accurate and sufficient to reasonably capture and communicate the likely effects of the Sensible Solutions proposal without requiring supplemental evaluation.

Comment: Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.

The identified need for the I-405 Corridor Program is to improve personal and freight mobility and reduce foreseeable traffic congestion in the corridor. The Sensible Solutions proposal falls short in transportation performance in comparison to Alternative 3. As discussed previously, the Sensible Solutions proposal could best be viewed as a possible first step for addressing the I-405 Corridor Program purpose and need rather than a long-term, 20- to 30-year vision.

The Sensible Solutions proposal includes many of the same transit elements as Alternative 3 and the Preferred Alternative, and about 25 percent of the roadway capacity elements. Criteria that focused on multi-modal performance through and beyond year 2020 were established to evaluate mobility effects of the alternatives presented in the Draft EIS. In almost all categories, Alternative 3 out-performed Alternatives 1 and 2, which more closely resemble the Sensible Solutions proposal.

Availability of funding will be critical in how the Preferred Alternative is implemented. Phasing will likely be required with initial phases providing many of the same improvements as proposed in the Sensible Solutions proposal, including aggressive transit improvements and early environmental mitigation. Subsequent phases will be aimed at continuing to improve mobility for people and goods within the corridor.

Code Number			Name	Comment	Response
E67	ALT	1	archer_S@email.msn .comAgency: Public	I Want option 2	Please see response to comment E31.ALT-1.
E68	ALT	1	Rowan Hinds rowanhinds@att.net Agency: Public	Thank you for the opportunity to comment on this very important project. With the daily increase in traffic, it is important to keep moving forward on this project. The preliminary preferred alternative is by far the best of the choices. This alternative provides the necessary additional lanes needed for the automobile traffic that is already here and growing into the future. In addition, it provides additional money for mass transit and other traffic management opportunities. None of the other options come close to providing the wide range of improvements that this alternative does. We cannot let the naysayers carry the day. Please stay the course and move the preliminary preferred alternative forward.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E69	SOL	1	Chord Shimabukuro Chord.Shimabukuro @intp.com Agency: Public	I am a part of a daily car pool and my suggestions are the following. 1) The HOV lane should be continuous from end to end because the merging, where ever it ends, is a proven bottleneck and points of accidents. 2) The installation of the HOV lane on I-405 should be put on the fast track over all other side street projects. 3) The worker head count seems to be scattered. I may not understand the man power loading but should you not concentrate resources on one section and move it to completion and as each section completes reline and open immediately for use.	Proposed HOV projects include providing direct access to HOV lanes and freeway to freeway HOV connections at major interchanges. Timing the construction of new HOV facilities will depend upon availability of funding. Implementation plans will be prepared with an emphasis on total build-out of the highest priority sections.
E70	SOL	1	Robert Rutkowski, Esq. 2527 Faxon Court Topeka, KS 66605-2086 Robert.Rutkowski@w olverine.capwiz.com Agency: Public	Washington State Department of Transportation's "Alternative 3" plan for I-405, which calls for the construction of four new lanes and the widening of neighborhood streets over 18 years, is not the answer to the region's traffic problems. Not only have independent studies shown that reliance on new lanes creates more traffic, Washington cannot afford the $8 billion price tag. In addition, "Alternative 3" threatens our quality of life. It will harm neighborhoods by boosting traffic on local streets, increasing noise, air and water pollution and worsening sprawl. I urge you to analyze "Alternative 5" as proposed by Sensible Solutions for 405. This plan will produce traffic improvements in half the time and at half the cost of "Alternative 3" by focusing on strategic road improvements, an aggressive trip reduction program and significantly increasing the number of buses, vanpools and park & rides. Thank you for your consideration.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E71	ALT	1	Mackintosh Bruce chi6@mindspring.com Agency: Public	My wife and I support the Preliminary Preferred Alternative alternative #3 - I think). We have a small service company that travels all over the north Puget Sound area, primarily up and down the 405 corridor (we work from our home in Woodinville). As we carry a number of tools and ladders, we cannot avail ourselves of public transportation. We have had to reduce the number of appointments we can take and have therefore suffered a direct drop in income, thanks to the congestion on 405. We are often forced to take both people on one appointment so we can use the carpool lanes - which is not exactly reducing congestion. Light rail - well we don't want to go there. We desperately need two more general purpose lanes on 405 to reduce trip time for all commuters and to show Condit and Ballmer that something is being done. If you have any questions, feel free to call or E-mail.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E72	TR	1	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 karenjoyw@hotmail.com Agency: Public	1. The 20-year planning horizon seems far too short, especially since it appears to include the construction period itself. To trade years of traffic disruption due to construction, and billions of dollars, for only a decade or so of somewhat improved traffic congestion is not a good deal.	The Draft EIS examines potential effects to 2030 or beyond for some transportation measures and cumulative and secondary effects, although most of the detailed analyses are focused on a 20-year horizon. The Draft EIS also addresses the degree to which each alternative provides sustainability or capacity into the future.
E72	TR	2	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 karenjoyw@hotmail.com Agency: Public	2. The transit components of all the Alternatives are presented in an extremely vague way, and appear not to have been thought through very well at all. "Increased bus service" and "HCT" are just general descriptions, not plans. The maps don't show which purple lines are intended to be HCT and which purple lines are supposed to represent bus service. Absolutely no indication is given of where the train stations, bus stops, and park-and-ride lots would go - let alone where the bus routes would begin and end, or how frequent the service would be on any given route.	WSDOT has been working extensively with transit service providers to develop a refined transit service plan for each of the alternatives studied in the DEIS. For travel forecasting purposes, initial assumptions were made as to where train stations, bus stops and park-and-ride lots would go; however, actual locations will be identified as more detailed- level planning occurs and an implementation plan is developed for the Preferred Alternative.

Code Number			Name	Comment	Response
E72	TR	3	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 karenjoyw@hotmail.com Agency: Public	3. No data were presented to address how effective the transit components would be in attracting peak-hour commuters (and thus reducing congestion). The least one would need, it seems to me, would be a map showing the locations of the jobs that people currently commute to using I-405. But we should go beyond that, and make a serious effort to find out what our commuting patterns in the I-405 corridor really are. How many people commute from Renton to the Boeing plant in Everett? How many commute from Mill Creek to downtown Bellevue? And so on. Two other important things to find out are how dynamic our commuting patterns are (how often do people change jobs and/or move?), and how willing people are to move because of changes in their commutes. To fail to collect all this information because it would be "too expensive" to run such a big survey would be minding the pennies while the dollars fly unnoticed out the window.	Future year travel forecasts were prepared for each of the alternatives, including estimates of vehicular traffic and person travel by transit, carpooling and in automobiles, during the peak period and on a daily basis. These forecasts were developed using travel forecasting models which are based on surveys and observations of current travel patterns and travel behavior in the I-405 study area and throughout the Central Puget Sound region. The screenline data (refer to Figures 3.12-1A, 3.12-1B, 3.12-1C) indicate the numbers of transit riders attracted during the P.M. peak period. Similar ridership would be expected during the A.M. peak period.
E72	TR	4	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 karenjoyw@hotmail.com Agency: Public	4. I am very worried by the claims I am hearing that adding freeway capacity rarely provides more than very short-term relief. If it is true that new lanes added to big-city freeways fill right up in just a few years or even months, pushing commute times right back up to what they were before, then adding lanes to I-405 would clearly not be in the public interest. We need to be very sure we understand the causes of this phenomenon, and very sure that we have taken the necessary steps to ensure that this does not happen on I-405. Otherwise, we are just throwing money away, or spending it to benefit newcomers moving in, while gaining nothing from it ourselves. A lot of people are already angry about subsidies to newgrowth.	Please see the response to comment E66.SOL-1 related to induced travel.
E72	TR	5	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 karenjoyw@hotmail.com Agency: Public	5. The Project Team seems to be dominated by highway expertise, with transit expertise underrepresented. The Executive Committee should demand that a better job be done developing, explaining, and justifying the transit components of all the Alternatives.	The project team includes a wide variety of highway, transit, environmental, and demand management expertise.
E72	O	1	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 karenjoyw@hotmail.com Agency: Public	6. On a general note, I think this project has just as much potential to damage - or restore - public trust in government as Sound Transit's light rail project.	Thank you for your comment.

Code Number			Name	Comment	Response
E72	O	2	Karen J. Williams 13430 314th Ave NE Duvall, WA 98019 karenjoyw@hotmail.com Agency: Public	P.S. - I grew up in and near New York City, and also have some familiarity with Washington, D.C.-area transit systems. I have commuted to work by Metro bus in the past, using express service from the Kent park-and-ride lot and subsequently (after a move) the South Bellevue lot. I know that efficient express transit service using park-and-ride lots can work extremely well when properly planned.	Thank you for your comment.
E73	ALT	1	John R. Alberti 442 - 7th Ave. S. Kirkland, WA 98033 425-822-5028 Quietlyjr@aol.com Agency: Public	I live in Kirkland and have to use I-405 regularly. I think Alternative 3 is the only plan on the table that will really provide the transportation capacity needed.	Please see response to comment L12.ALT-1.
E74	ALT	1	Richard A. White 4727 48th Ave. S. Seattle, WA 98118 richwhite@jps.net Agency: Public	I'm writing to let you know I support Alternative 3 on the I-405 Corridor EIS. I provides the biggest bang for the buck. I will add both general purpose capacity and transit capacity on 405. I-405 is the life line on the Eastside. In order for GMA to work the investments need to be made within the Urban Growth Boundary to support the growth in population as well as prevent the sprawl to other counties that GMA is trying to prevent. In the past 30 years this state has significantly under-invested in our transportation infrastructure. This has cause millions if not billions of dollars of loss in both wasted time for businesses as well as residents as they sit in congestion. In addition, without added capacity there is no place for transit to go besides sit in congestion. The transportation system must be treated as a holistic system. There is no silver bullet to reduce congestion. It all must be done. Including general purpose capacity. The mode wars must stop!! Let's see if our generation can step up to the plate and not strike out!!	Please see response to comment L12.ALT-1.

Code Number			Name	Comment	Response
E75	ALT	1	Nancy A. Stephens 10208 126 Ave NE Kirkland, WA 98033 nancystephens@smlgroup.com Agency: Public	I encourage you to support the Prefered Plan Alternative #3 for the I-405 improvements. We need to expand the number of available travel lanes in each direction on I405 (except from downtown Bellevue thru the 520 interchange - it is already wide). It is insane that traffic stops at the borders of Renton in both directions due to backups to 167 highway off ramps. And from Kirkland thru the Bothell-Woodinville interchange in the mornings and afternoons, the narrowness of the freeway brings traffic to a screeching halt. How insane to allow development of areas, without providing either adequate street access or public transit access. Since it seems impossible to get Light Rail moving from Everett thru to Sea-Tac following the I405 corridor with stops at Totem Lake and Bellevue Square and SouthCenter, we need more lanes for automobiles. Light Rail would be the best next step after the widening of the lanes of I405.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E76	ALT	1	Natalie Musolino Kirkland, WA natchris@gte.net Agency: Public	Thank you for your informative move on 405 website. I was able to obtain useful information that has aided me in forming an opinion on the best solution for relieving the real problem of 405 congestion. I travel on 405 daily, so any action or non-action will have a direct impact on myself and my family daily. I definitely support action. In the 7 years that I have lived along the 405 corridor, the congestion problem has gotten worse not better. After reviewing your website I wholeheartedly would support Alternatives 2 or 3. Initially I favored #2, but after reviewing the technical charts and cost analysis, #3 has many advantages. Please consider this email my vote of support for "Move on 405."	Please see response to comment L12.ALT-1.
E77	ALT	1	William Downing 20630 NE 66th Place Redmond, WA 98053 WED@DowningCorporation.com Agency: Public	I support Preliminary Preferred Alternative (Alternative 3) re: www.moveon405.com -	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.

Code Number			Name	Comment	Response
E78	ALT	1	Roger Harbin 16225 NE 112th CT Redmond, WA 98052 ROGHAR@SAFECO.com Agency: Public	I am a resident of the region which includes I-405. We have experienced significant job and population growth on the east side of Lake Washington, but have not kept up in our transportation infrastructure. The result is that I-405 has become highly congested, so traffic takes nearby arterials instead. As those arterials also get congested, traffic finds it way onto neighborhood streets and roads. This is a serious detriment to the quality of life on the Eastside. The I-405 corridor program has identified a "Preliminary Preferred Alternative" which includes a mix of added general capacity, added bus rapid tranist, and improvements to the current stormwater catch system. This alternative meets the objectives most people identify as most important: 1. Add enough capacity on I-405 to get traffic moving more smoothly and encourage neighborhood and arterial traffic to return to the freeway instead of finding local cut-throughs. 2. Add enough bus rapid transit service to increase the frequency of service to the point that riders will be willing to use the bus for trips within the Eastside, not just to downtown Seattle. 3. Do all of this with reasonably little environmental impact, particularly to salmon-bearing stream banks and beds. I support the conclusions of the I-405 corridor program, and I urge the Executive Committee to make the Preliminary alternative the final selection.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E79	ALT	1	Linda Holman Linda.Holman@vopakusa.com Agency: Public	Having served as a member of the Citizen's Committee on the I-405 Corridor Program since its inception, I would like to reiterate my support for Alternative 3 as the Preferred Alternative.	Please see response to comment L12.ALT-1.
E80	ALT	1	Ross D. Jacobson rjacobson@wkg.com Agency: Public	I want to voice my vigorous support for the Preferred Alternative 3 for reducing the horrific traffic congestion on I-405.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. Also see response to comment L12.ALT-1. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
E81	TR	1	Pamela and Robert Miller 4546 Lake Washington Boulevard NE Kirkland, Washington 98033 pamiller@blarg.net Agency: Public	We are residents of Kirkland's Lakeview Neighborhood and members of their Association. We are NOT in favor of any proposals for resolving I 405 traffic congestion which will INCREASE traffic on our neighborhood streets or arterials, and that includes HOV lanes on any streets, which all the proposals seem to think is a solution.	The Preferred Alternative will reduce travel on many neighborhood streets.
E81	SOL	1	Pamela and Robert Miller 4546 Lake Washington Boulevard NE Kirkland, Washington 98033 pamiller@blarg.net Agency: Public	Solutions have to focus on mass transit and enticements to getting people out of their cars, not funneling them through our neighborhood streets. Bus transportation needs to be entirely subsidized (free for ridership), frequent schedules, and convenience of park-and-ride locations to be MORE attractive to people than taking their cars to work each day. If it were free, convenient, faster, people would soon decide for themselves it really can be a more attractive alternative than sitting in traffic on a freeway.	The Preferred Alternative includes a wide range of expanded transit services (up to 70 percent). Much of this expanded service would improve neighborhood connections. 5000 additional park-and-ride spaces are included, combined with a very aggressive transporation demand management program to provide incentives for transit and carpooling use. Free transit rides are not included, as surveys have shown that convenient and reliable transit service is more important than the cost of the fare.
E82	ALT	1	Dean Rebhuhn Woodinville, Wa. deanr@johnlscott.com Agency: Public	I support alt 3. Multiple modes are needed. General capacity is most important. Two additional lanes in each direction are crucial. Less than that will not work.	Please see response to comment L12.ALT-1.
E83	ALT	1	Terry Miller 1200 Westlake Av N #406 Seattle, WA 98109 terrymiller@cbba.com Agency: Public	The Alternative #3 is my favored choice for the alternative for I-405, too.	Please see response to comment L12.ALT-1.
E84	ALT	1	Ellen Vaughn Issaquah, WA ellen.vaughn@worldnet.att.net Agency: Public	Please select and implement alternative 3.	Please see response to comment L12.ALT-1.

Code Number			Name	Comment	Response
E85	ALT	1	Roger L. Anderson roger@gly.com Agency: Bellevue Chamber of Commerce/Meydenbauer Center	As a lifelong Bellevue citizen, Director of the Bellevue Chamber of Commerce, and Director of Bellevue's Meydenbauer Center I have carefully followed the development and presentation of each alternative presented for I 405. I am strongly in support of Alternative 3 which reduces congestion and improves mobility.	Please see response to comment L12.ALT-1.
E85	O	1	Roger L. Anderson roger@gly.com Agency: Bellevue Chamber of Commerce/Meydenbauer Center	As an American citizen, Washington State citizen and supporter of representative government I strongly object to the "back door", elay by last minute criticism, tactics of Sensible Solutions for 405. When obstructionists can undo the efforts of so many who followed the rules and came to the right conclusion it spells the death democratic society. The Washington State Department of Transportation can be very proud of its process for the I 405 process. Lets stand behind what was done right and make the call to proceed with design.	Thank you for your comment.
E86	ALT	1	Dave Gent davegent@WilderConstruction.com Agency: Snohomish County Committee for Improved Transportation	On September 18, 2001, the SCCIT Executive Board voted to unanimously endorse the preliminary preferred alternative (alternative #3) as the most responsible and responsive approach to improving the I-405 corridor. This decision was made after presentations from State Senator Jim Horn and Snohomish Co. Council member Barbara Cothern. These presentations supplemented individual research and extensive discussions by the membership of SCCIT. As an additional recommendation, SCCIT urges the pubic agencies involved in pursuing the I-405 Corridor Program, as envisioned in alternative #3, to vigorously resist the attempts by Sensible Solutions for 405 to undermine and subvert the EIS and decision-making process.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E87	O	1	Pat O'Connor PTOCONNOR@aol.com Agency: Public	I'm sorry that none of them fit the picture I'd like to see. I am against adding another lane to 405, and I'm against paving over more acres for park-n-rides. When I believe in both the freeways and park-n-rides, building more of them will not reduce congestion. All of the options have one of these on their list.	Thank you for your comment.

Code Number			Name	Comment	Response
E88	O	1	Patricia Brown 4700 Lakehurst Lane Bellevue WA 98006 PatriciaB@isomedia.com Agency: Public	After trying to wade thru the lengthy DEIS for the I-405 Corridor Program proposal, I'm not quite sure I understand what the findings were. When I left the local library, I came away with the feeling that it said the impacts would be minimal. If that really is what it said, I think something went wrong somewhere. I live downhill from I-405 near the Newport Hills Park and Ride lot. My husband and I have resided here for 33 years, and every time there have been alterations to I-405 we have been negatively impacted. We have had to deal with tons of silt along our shoreline, more air pollution, much higher levels of sound pollution, and the kicker is an unbelievable increase in ground water and drainage runoff that resulted after the HOV lanes were added. The latter has caused parts of my property to become year round mud holes and contributed to stubborn drainage problems. I believe this was all caused by the DOT changing the way I-405 drained and by adding all the paved surface.	The individual highway projects will comply with both local and state requirements that stormwater runoff be managed so as not to cause any additional downstream water quality or flooding problems.
E88	GS	1	Patricia Brown 4700 Lakehurst Lane Bellevue WA 98006 PatriciaB@isomedia.com Agency: Public	I can't understand how you feel you can add a minimum of two lanes in the area above my home. If you excavate to the East, you risk the hill side of Newport Hills coming down.	Analyses of slope stability and design of mitigation measures, such as retaining walls, buttresses, and groundwater control, will be performed during the design of excavations or embankments on hillsides.
E88	TR	1	Patricia Brown 4700 Lakehurst Lane Bellevue WA 98006 PatriciaB@isomedia.com Agency: Public	If you go to the West, you infringe upon old Lake Washington Blvd. And if you plan to use the existing Burlington Northern-Santa Fe tracks, there is no question there will be a negative affect and high impact on the adjacent properties.	The property effects of the I-405 alternatives have been considered in the DEIS. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E88	ALT	1	Patricia Brown 4700 Lakehurst Lane Bellevue WA 98006 PatriciaB@isomedia.com Agency: Public	I would like to go on record voicing my opinion to go with the No Action Alternative.	The Preferred Alternative is similar to Alternative 3. For a description of the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
E88	SOL	1	Patricia Brown 4700 Lakehurst Lane Bellevue WA 98006 PatriciaB@isomedia.com Agency: Public	If King County Metro would get their bus system in order and offer services to where the riders need to go and when they need to go, maybe people would get out of their cars and take the bus.	Thank you for your comment.
E89	ALT	1	Theresa Zanassi Kirkland/Juanita, WA tzreader@prodigy.net Agency: Public	Just to add my voice to those supporting Preferred Alternative 3. I am especially interested in the expansion of express bus/HOV service along the 405 corridor and other roadways. I have wanted to use bus service to commute for some time, but without express service from the Totem Lake or Houghton area to Mercer Island, it has not been a viable option for me due to family responsibilities. With express service, I believe there are several people from my place of business who would at least investigate the possibility of using bus service to commute.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E90	ALT	1	Karen Little 5030 First Avenue South Seattle, WA 98134 KLittle@Essention.com Agency: Public	As a Bellevue resident and business person who relies on a workforce in King County that can afford and successfully arrive at work reliably each day, it is critical that we make some decisions and move forward to reduce our transportation problems. I agree with the many organizations who support Alternative 3, that this is the best choice to achieve our objectives. Please help our communities make progress on this critical issue.	Please see response to comment L12.ALT-1.
E91	O	1	Joni Campbell Kirkland, Washington arial@w-link.net Agency: Public	Thank you for this opportunity to make comment concerning the proposed answers to reduce congestion on I405. We definitely could use traffic relief on this horribly sluggish freeway. However, I do not agree with adding two more lanes as a solution to the problem. I realize that thorough study of traffic flow, etc., has been conducted concerning what might work the best to keep traffic moving especially during rush hours, and I realize that my opinion is based only on experience and observance having lived in this area now for over 25 years.	Thank you for your comment regarding added capacity on I-405. The Preferred Alternative contains a bus rapid transit system operating in improved access HOV lanes, as well as other substantial improvements including park-and-ride lots, transit stations, bicycle and pedestrian facilities, and truck freight enhancements. The Preferred Alternative also includes up to two additional lanes in each direction on I-405 to help reduce congestion and improve mobility across all transportation modes. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E91	TR	1	Joni Campbell Kirkland, Washington arial@w-link.net Agency: Public	Adding two lanes will not solve the problem. For one good reason: It will take 10 years to complete the project. By then, the population will increase and so will the traffic, only leaving a need for more lanes. We are 10 years behind on solving road and traffic issues for the Eastside of Lake Washington.	The Draft EIS examines potential effects to 2030 or beyond for some transportation measures and cumulative and secondary effects, although most of the detailed analyses are focused on a 20-year horizon. The Draft EIS also addresses the degree to which each alternative provides sustainability or capacity into the future.

Code Number			Name	Comment	Response
E91	SOL	1	Joni Campbell Kirkland, Washington arial@w-link.net Agency: Public	Let's get ahead of the game by considering new freeway/highway routes or conversion of existing roads to freeways that will flow traffic to where the traffic is going. A considerable amount of traffic along 405 is heading from Renton to Mill Creek, Snohomish, Monroe, Everett. What about a 4 lane connecting I-90/520/and highway 2 to the east of 405 and another connecting Highway 2 to I5 at Mill Creek. So, it will take too much time to negotiate new roads? If it wouldn't take longer than 10 years, then this solution would be worth waiting for rather than waiting 10 years for 4 more lanes on I405 that only leaves us in the same situation we face today, but worse, we now are the proud owners of a super highway with twice the number of congested vehicles. Doesn't seem too appealing when you consider resident's quality of life along or near (I live near) the I405 corridor.	A study of a freeway in east King County sponsored by WSDOT (CONEKC) showed there would be some effects on the traffic on I-405. Development of a new east King County freeway corridor was not advanced for further consideration as part of the I-405 Corridor Program for the reasons discussed in Section 2.2.7 of the I-405 Corridor Program Draft EIS. This does not preclude future consideration of a rural King County freeway as part of another study.
E92	PPA	1	Ned Wolf nedwolf@rcia.com Agency: Public	In response to your preferred alternative for expanding I405, I must heartily protest.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. The Preferred Alternative was recommended in November 2001 by the Executive Committee after the DEIS was published and comments were considered, and was advanced to the FEIS by the co-lead agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E92	COST	1	Ned Wolf nedwolf@rcia.com Agency: Public	Its expense is overwhelming - its timeline excessive.	See response L50.COST-1.
E92	WR	1	Ned Wolf nedwolf@rcia.com Agency: Public	The impact on our environment is unconscionable - an estimated l,000 pounds of toxins running into our watersheds daily is not acceptable.	Nowhere in the I-405 Corridor Program DEIS is there a reference to "1,000 pounds of toxins running into the watersheds" or streams. The second paragraph under the Surface Water subsection (page 3.5-21) of the I-405 Corridor Program DEIS does state that 280 tons per year (about 1,500 pounds per day) of additional suspended solids would be generated along the length of I-405 as a result of projects constructed under Alternative 3. Water quality treatment of road runoff would reduce suspended sediments by at least 80 percent below this level.
E92	SOL	1	Ned Wolf nedwolf@rcia.com Agency: Public	Please revise your plan to include alternatives, such as using the Burlington Northern right of way for effective rail service - a lot can be produced for $7.7 billion that won't be obsolete by the time it's completed.	Alternative 1 - HCT/TDM Emphasis, and Alternative 2 - Mixed Mode with HCT/Transit Emphasis, both include a physically separated, fixed-guideway high-capacity transit system potentially using some form of rail technology within portions of the BNSF right-of-way. No more definitive decision has been made regarding the type of technology that would be employed.

Code Number			Name	Comment	Response
					Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. These systems, along with the bus rapid transit system included in Alternative 3 and the Preferred Alternative were found to attract similar levels of transit riders using up to twice the level of transit service that currently exists in the corridor. The shift to transit riders was most notable in the peak periods, with transit usage approaching 15percent in downtown Bellevue and up to 10 percent in other activity centers in the corridor. The transit systems would have sufficient capacity remaining after 2020 to accommodate future demands within the I-405 study area. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E92	TR	1	Ned Wolf nedwolf@rcia.com Agency: Public	Please review how other communities with our population size and our growth rates have dealt with this problem - all too many studies show that merely adding lanes of auto traffic is only contributing to the congestion.	National studies of transportation investments include many communities with similar characteristics to the I-405 corridor. Most of these communities have chosen a multimodal solution, which is similar to the Preferred Alternative for I-405. Much of the utilization of new road capacity is related to the growth in population and employment within the study area and region. The other effects, known as induced travel, have been largely accounted for in the I-405 travel forecasts. Please refer to E66.SOL-1 response relating to induced travel effects.

Code Number			Name	Comment	Response
E93	ALT	1	Kathi Swarthout kathire@earthlink.net Agency: Public	I fully support the preliminary preferred alternative (Alt. #3) to 405. The cost to the quality of life is horrendous. Hour are spent on travel to and from work. YES on Alt.#3.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E94	ALT	1	Jim Shulkin JShulkin@Essention.com Agency: Public	I am an eastside resident (Kirkland) and voter and wanted to send a message expressing my strong support for this initiative. It's far overdue that something be done about the mess that we refer to as I-405. We've been collectively sitting around playing with our navels long enough on this issue. We are beyond the point where another seemingly decade-long construction effort to widen a one mile portion of the highway is going to help, it's time to be more future-minded and act on a solution that will make a difference 10 years from now. I believe that Alternative 3 does that. Let's quit talking about it and move.	Please see reponse to comment L12.ALT-1.
E95	ALT	1	James Simkins James.Simkins@willowslodge.com Agency: Public	I have had the opportunity of reviewing the I-405 Corridor Program and the four alternatives presented as part of that study by the department of Transportation. In view of both current and projected traffic loads for this main arterial, I endorse the selection of Alternative 3 as the Preliminary Preferred Alternative and look forward to seeing further progress in the implementation of this Alternative.	Please see response to comment L12.ALT-1.
E96	SOL	1	Heather Malang Bellevue, WA hmmalang@hotmail.com Agency: Public	I would love to have I405 expand! It is truely needed. Also, please change the Hwy 167 exits in both directions. They are always backed up at any time of the day.	Thank you for your comment.

Code Number			Name	Comment	Response
E97	ALT	1	Rich Menti rmenti@windermere.com Agency: Public	Hi I am a business owner in Renton and Maple Valley and I strongly support the Preliminary Preferred Alternative (Alternative #3). The better the access to and from South King County the better business is for all of us. Here are a few more points brought up by some of my Colleagues as well. Thank you, R * Reducing congestion on 405 will improve our quality life by giving us more time for the things we enjoy and the Preliminary Preferred Alternative provides the most cost-effective congestion relief. o I-405 is the second most traveled corridor in Washington State, carrying 280,000 people per day in the Bellevue area. o In 1999, Puget Sound area residents lost 53 hours of time to rush-hour traffic delays. o By 2020, I-405 congestion will increase from 1.5 hours to almost 6 hours per day. o A comprehensive cost benefits analysis by independent consultants found Alternative 3 provides the biggest return on investment of all the alternatives. * Our region's economic future depends on improving 405 businesses such a Boeing and PACCAR in Renton, tech companies in Bothell and Microsoft in between can't afford increased congestion along the corridor. o Between 1970 and 1990, employment in the area increased 200 percent while population rose 66 percent. o Planned growth of population and employment is estimated at 35% in the next 20 years. This equates to 8 employers the size of Microsoft and 2 new cities the size of Bellevue. o Twice as much freight is carried on I-405 than comes through the Port of Seattle each year. * The Preliminary Preferred Alternative offers an opportunity to improve the environment by restoring and enhancing systems to mitigate existing environmental problems.	Your points generally match the findings in the DEIS, although we did not report Puget Sound total delays and cannot verify that portion of your comment.

Code Number			Name	Comment	Response
				o Beyond operational and transportation benefits, reduced congestion would result in greater energy efficiency and less fuel consumed per mile traveled. Similarly, reduced congestion would result in reductions in emissions of several criteria air pollutants, which could help improve regional air quality. o Alternative 3 components expand or reconstruct existing transportation facilities, therefore opportunities to retrofit stormwater treatment facilities would result in overall improvements to surface and groundwater quality. o Removal of barriers to fish passage and stream improvements would benefit aquatic habitat and endangered fish species. * The Washington State Department of Transportation's 405 Corridor Program is a model for building public consensus for future transportation improvements. o The I-405 Corridor Program is an unprecedented, 2-year cooperative effort involving citizens, elected officials, environmental groups, businesses and over 30 agencies that have responsibilities for planning, regulating, and implementing transportation improvements in the 250-mile corridor. * Decreasing congestion on 405 will improve safety in neighborhoods along the corridor by reducing cut-through traffic from drivers seeking relief from 405. -The cities of Bellevue, Bothell, Kirkland, Newcastle and Renton have endorsed Alternative 3. Cut-through traffic is a major problem and concern of residents and elected officials from these cities. Conclusion * We can't afford not to improve 405 -- the cost to our quality of life and economic well-being is too great if we don't act. o In 1999, the cost of freeway congestion in the Seattle-Everett area was estimated to be $930 per person per year. o In 1999, Puget Sound area residents lost 53 hours of time to rush-hour traffic delays. o The Preliminary Preferred Alternative will reduce vehicle hours of travel by over 13 million hours per year. o Under the Preliminary Preferred Alternative, accidents on I-405 would decrease, resulting in a savings of $42 million per year. o The Preliminary Preferred Alternative would reduce congestion by 20% overall and accommodate 110,000 trips. This equates to a travel time savings of $569 million per year.	Thank you for your comments regarding benefits of Alternative 3.

Code Number			Name	Comment	Response
E98	ALT	1	Darcy Barham 16821 172nd Pl. NE Woodinville, WA 98072 info@madisonhouseretirement.com Agency: Public	I support the selection of Alternative 3 as the Preferred Alternative.	Please see response to comment L12.ALT-1.
E99	ALT	1	Julie LaPrarie Julie@RowleyEnt.com Agency: Public	I fully support the objectives of alternative 3 in the Move on 405 proposal. Especially important are the addition of general traffic lanes and a solution to the dangerous backups at the 405/167 interchange. Something must be done right away.	Please see response to comment L12.ALT-1.
E100	ALT	1	Kimberly Daniel kim.daniel@paccar.com Agency: Public	It's time to solve our traffic problems and it's time to do it right! We know traffic will continually worsen. Why would we even consider only adding one traffic lane to I-405. I think the best solution is Alternative 3 but with one modification.	Please see response to comment L12.ALT-1.
E100	SOL	1	Kimberly Daniel kim.daniel@paccar.com Agency: Public	In addition to the two added traffic lanes, I think one express lane in each direction should be added. I feel the Seattle area is behind the times in solving the traffic problems. We spend tons of money analyzing and working on solutions such as the Sounder trains that don't solve the problems. Let's be forward thinking and add the required lanes!	Thank you for your comment.
E101	ALT	1	Darylene Dennon solidenergy@home.com Agency: Public	I share my support for Alternative 3 to reduce congestion and improve mobility. Please note that this support is for the selection of Alternative 3 as the Preferred Alternative. I wanted my voice to be heard a small business owner in Woodinville and a Woodinvile Chamber of Commerce member.	Please see response to comment L12.ALT-1.
E102	ALT	1	Warren Koons 10500 NE 8th Street - Bellevue, WA 98004 warrenkoons@dwt.com Agency: Public	A little background to my support for Alternative 3: I live in the Woodinville area and commute to downtown Bellevue. I have been making this commute since 1987. During those 14 years I have seen the mobility along the I-405 corridor deteriorate dramatically. What was once a reasonable commute, is now a significant problem that impacts my daily life in many adverse ways. The tail is wagging the dog. There is not just the lost time--which is itself huge and almost incalculable--but also the collateral damage this horrible I-405	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.

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				congestion causes: foregone activities and events, missed dinners, missed ballgames, etc. Substantial increase in stress. Decisions to not engage in certain activities or events because the added time and uncertainty surrounding the commute. And I am one person. Add this up for hundreds of thousands over many years, and you have a serious impact on the livability of our area. Thus, I would strongly urge you to move forward with Alternative 3, the Prelimianry Preferred Alternative, for the I-405 corridor program. Please press ahead with this with all diligence and help get our mobility back to something approximating reasonable. Thank you for listening.	The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E103	N	1	Aaron Contorer aaron@washingtondata.com Agency: Public	The Draft Statement is severely flawed. First, inadequate attention and emphasis is given to the noise impacts of expanding I-405. Noise is a cost that will be paid every day and every night, and adds up to a very significant impact which is far worse in the options that widen 405.	At this stage, the potential for noise increases under each of the alternatives has been evaluated by comparing the number of potential affected residential parcels under each of the alternatives. Noise impacts at specific locations along the corridor, along with mitigation measures, such as noise walls, would be evaluated as specific designs are developed for areas of the corridor.
E104	N	1	Aaron Contorer mailto:contorer@scn.org Agency: Public	First, inadequate emphasis is given to the noise impacts of expanding I-405. Noise is a cost that will be paid every day and every night, and adds up to a very significant impact which is far worse in the options that widen 405. Furthermore, it is not only a psychological cost but also a financial cost as property values are driven down and stress-related medical bills are driven up. In addition, a reasonably quiet environment at night should be seen as a human right, as per the recent finding of the European Court on Hearthrow airport noise.	Please refer to the response to comment E103.N-1
E104	TR	1	Aaron Contorer mailto:contorer@scn.org Agency: Public	Second, alternatives with extremely large improvements in environmental impact were not reasonably studied or even adequately described. Here I would draw special attention to congestion pricing, a proven technique for improving flow and for reducing pollution. Shame on the authors for omitting this key option, which effectively renders the existing Draft Statement unusable.	Many concepts were considered by the study committees. Congestion pricing was discussed; the consensus of the study committees was that pricing is a regional policy and that I-405 could not by itself implement effectively. The effects of congestion pricing were documented in Alternative 1. Please note that for reasons not related to the potential performance of the pricing strategies, Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program. This is because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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E104	O	1	Aaron Contorer mailto:contorer@scn.org Agency: Public	Third, inadequate attention is paid to the different impacts on local arterials of the different plans. Vastly increased vehicle flow on 405 will create traffic jams on numerous arterials throughout the region, leading to further pollution, further noise, further traffic delays, and the need to pave even more land to widen said arterials, destroying habitat and creating drainage problems.	The DEIS documents the relative impact, system-wide, on the arterials within the I-405 study area. The FEIS includes additional information on the effects of the alternatives on artertials within the study area. In particular, the differences in impacts on east-west vs. north-south arterial routes are documented.
E104	LU	1	Aaron Contorer mailto:contorer@scn.org Agency: Public	Fourth, inadequate attention is paid to the impact of the different programs on future land use and sprawl. Increasing general vehicle capacity will cause more sprawl, and therefore more environmental damage, than other options.	Please see the responses to comments L27.LU-1 and E66.SOL-1.
E104	O	2	Aaron Contorer mailto:contorer@scn.org Agency: Public	The Statement must be corrected to more accurately reflect the true, total costs of expanding freeway capacity, and to honestly reflect the other options available at lower impact, such as congestion pricing.	Costs are provided for all program elements. These costs include the cost of construction, right-of-way, and operations. A companion study of benefits and costs was prepared that provides a more complete examination of direct and indirect costs of an alternative. Congestion pricing was included as a component of Alternative 1 in the context of a regional pricing strategy.
E105	O	1	Lana V. Rich 22508 NE 98th Place Redmond, WA 98053 lanarich@hotmail.com Agency: Public	I am writing in response to WSDOT's call for comments regarding the five proposed alternatives on improving traffic congestion on the I-405 corridor. This issue is very important to our community because the traffic congestion in the area may be considered one of the worst in the nation. I used to commute on I-405 between Renton and Bellevue during morning and evening rush hours on a daily basis, and the 20-mile commute that should take approximately 15 to 20 minutes took me about an hour to an hour and a half each way. The public is called to choose among five proposed alternatives. The main goals of these alternatives are to improve personal and freight mobility, reduce congestion, and improve safety of the travelers. Also, the alternative selected should accommodate future increases in volume resulting from population growth in our area. The No Action Alternative includes the funded highway and transit capital improvement projects of cities, counties, Sound Transit, and WSDOT. These projects have already been scheduled for implementation within the next six years, and should occur regardless of the outcome of the I-405 corridor program. Under this alternative, no expansion of I-405 will take place; only the modifications to the existing ramps will be constructed. Also, approximately 36 high occupancy vehicle (HOV) direct access projects, arterial HOV improvements, park-and-ride expansions, and transit center enhancements would be implemented as part of this alternative.	For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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E105	ALT	1	Lana V. Rich 22508 NE 98th Place Redmond, WA 98053 lanarich@hotmail.com Agency: Public	In my opinion, the No Action Alternative is insufficient to meet the goals of relieving congestion and improving mobility and safety of travelers. According to your report, several areas of I-405 are congested for over five hours a day, and some areas are congested for 12 hours a day. Also, our community will continue to grow in the future, which will make the commute on I-405 even worse, if nothing is done about relieving congestion. Although much of traffic congestion takes place on the ramps connecting I-405 to other freeways, the majority of congestion is on the freeway itself. This means that we need more lanes on I-405, the new and improved transit system, such as a monorail, or a combination of added lanes and public transit. We simply do not have an option of not taking some radical measures toward reducing traffic congestion. Therefore, we have to choose the optimal solution to the congestion problem from the remaining four alternatives. Alternative 1 attempts to minimize the need for general purpose transportation improvements and to encourage transit use on I-405. To do this, Alternative 1 emphasizes reliance on a new physically separated fixed-guideway HCT system and substantial expansion of local bus transit service. It does not include any increase in roadway capacity beyond the No Action Alternative. Alternative 2 has the same commitment to improving transit service as Alternative 1. In addition, Alternative 2 proposes to add one lane in each direction on I-405 and improve the ramps connecting I-405 to other freeways. Alternative 3 would implement a new bus rapid transit system, substantial expansion of local bus transit service, two added lanes on I-405, and improvements to the connecting ramps. I believe that the best alternative is Alternative 4. This Alternative places the greatest emphasis on increasing general purpose and HOV roadway capacity, with substantially less reliance on new transit facilities or added local bus service than any of the other alternatives. To do this, Alternative 4 would provide one additional lane in each direction on I-405, a new four-lane I-405 express roadway, and the other general purpose and HOV roadway improvements on I-405 and connecting freeways contained in Alternative 3. Alternatives 1, 2, and 3 focus more heavily on encouraging the use of transit service as opposed to single and high-occupancy vehicles. However, I believe this project should focus instead on increasing I-405 capacity for single-occupant vehicles (SOVs).	Your observations regarding the modal usage and trip purposes (e.g., work trips vs. other trips) point out the difficulties in providing transit services to meet a wide variety of trip needs within the study area. Each of the alternatives presents a multimodal approach, although you are correct that Alternative 4 focuses most on providing automobile capacity. Alternative 3, which is similar to the Preferred Alternative, includes a bus rapid transit system, which would use the HOV system along I-405 and provide access to major destinations that people want to visit. It also includes a major expansion of I-405 general capacity and arterials.

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				Your report indicates that SOVs generate 78 percent of traffic demand; high-occupancy vehicles (HOVs) and transit users comprise about 20 percent of all work trips; and school buses and commercial vehicles make up the rest of the travelers on I-405. Moreover, only 20 percent of the total daily person-trips are home-based work trips, that is, commute trips directly to and from work. Thirty-nine percent of daily person-trips are other home-based trips (e.g., shopping, recreational, personal business) and 28 percent are non-home-based trips (e.g., traveling from work to daycare or shopping). School (two percent) and commercial vehicle trips (11 percent) make up the rest. The relative share of each trip purpose are expected to be similar in 2020. The fairly small share of trips that are purely to and from work reflects the fact that people are increasingly linking their trips, stopping on the way home to shop, pick up children, and so on. This poses a challenge for transit and carpool/vanpool use. Based on this factor, therefore, the chosen Alternative should focus more on expanding the use of the I-405 corridor. Alternatives 2, 3 and 4 propose expansion of the I-405 corridor, the least expansion-oriented being Alternative 2, and the most expansion oriented being Alternative 4. Alternative 2 proposes to add only one extra lane each way on I-405, which, in my opinion, is insufficient to relieve present congestion and plan for future population growth in the area. Focusing on transit service may not be an optimal solution, based on the above-mentioned statistics, because people may not be able to use it to meet their daily travel needs. Alternative 3 focuses on expanding the bus transit system and adding two lanes each way on I-405. I do not believe that many people in our area would give up the convenience of using their own vehicles to use the bus system instead. Things like running errands during the lunch hour may not be possible without a vehicle. Multiple stops of buses may cause prolonged travel time.	

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				Even people living and working in Seattle rely on their own vehicles more than they do on buses. Therefore, the optimal alternative, in my opinion, is Alternative 4. This Alternative proposes major expansion on the I-405 corridor, which should accommodate our present and future commuting needs and relieve congestion. Heavy traffic demand and frequent traffic incidents contribute to substantial traffic congestion on I-405. Travel time along the I-405 corridor is also unreliable due to these frequent traffic incidents. With added lanes, there should be less congestion, which, in turn, should reduce the number of traffic accidents on I-405. I spent countless hours in stop and go traffic on I-405. In my experience, many drivers become impatient and aggressive, which is the leading cause of accidents. Many accidents that take place on I-405 are associated with the on-ramps, although most accidents occur on the mainline freeway. Again, Alternative 4 seems to be the best one to alleviate these problems and increase safety for all travelers. Another reason for congestion on I-405 is the design of some sections of the I-405 corridor, namely, S-curves, grades (such as Kennydale Hill), and complex interchanges at I-5 and SR167. Also, the decreasing reliability of I-405 is contributing to a serious problem for regional freight mobility. Automobiles, forest and agricultural products, communications and computer equipment, and other different items are continuously being transported on I-405. Substantial delays resulting from I-405 congestion cause financial losses to the regional businesses. Construction of additional lanes, roadway and interchange improvements proposed by Alternative 4 should help reduce or eliminate some of these problems. According to your air quality studies, Alternative 4 would provide the least air pollution out of all five alternatives. Increased traffic lanes will result in the fewest daily emissions of carbon monoxide, hydrocarbons, and nitrogen oxides. No other adverse affects on the environment are foreseen as a result of this project.	

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				Many projects in Alternative 4 require the purchase of land for new right-of-way, and some projects may cause disruption of existing or future land use activities that may result in potential substantial impacts. Mitigation of these impacts would include the best management practices for the construction impacts, creation of buffers and open space for operational impacts, and focus on re-development opportunities. I believe that this impact on land use in our area is an acceptable drawback of this Alternative, compared to the benefits derived by travelers and businesses when this project is completed. In summary, Alternative 4 appears to be the most comprehensive of all others directed at reducing the congestion on I-405. It accommodates the highest corridor travel demand and achieves the best travel time savings for general traffic. It also provides the largest improvement in congestion levels. Also, Alternative 4 provides the best safety level through improved physical and operational design of I-405, reduction in congestion levels, and concentration of travel along the safer freeway corridors.	
E105	SOL	1	Lana V. Rich 22508 NE 98th Place Redmond, WA 98053 lanarich@hotmail.com Agency: Public	In order to help fund the construction projects based on this Alternative, a freeway toll system should be implemented. Since stopping at toll booths every so often to pay may cause congestion, an E-ZPass toll system should be installed. To my knowledge, this system is currently functioning successfully in the states of Illinois and New York. With E-ZPass electronic toll collection technology, account information on a tag installed in each car is read by a receiving antenna at the toll plaza. The toll is electronically deducted from a pre-paid toll account. This technology may be offered to the drivers at the time they register their vehicles. For more information on this technology, you may visit www.ezpass.com.	Alternative 4 included a sensitivity analysis of tolls. WSDOT is conducting separate operational studies of managed lanes, which could include tolling options. These actions were not included as part of the Preferred Alternative and are not covered in the FEIS.
E106	ALT	1	Kurt Widmann kurt@adhost.com Agency: Public	I'll support the Preliminary Preferred improvement plan for I405. I've been carpooling for 5 years from Federal Way and the bottlenecks at 167 and I-5 south around South Center are horrible. If the east side had some direct busses or trains that didn't take 2 hours each way from the south end mass transportation might even be an option but at this point it's only a last resort.	Please see response to comment L6.ALT-1.

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E107	ALT	1	Charlie Conner 846 108th NE Bellevue, Wa 98004 cfc@connerhomes.com Agency: Public	I support alternative three which i understand to include two additional all purpose lanes in each direction. I respect the work the citizens committee has done over the last two years and believe it is time to get started so that we may have some congestion relief. Those who are in opposition to alternative 3 have no viable solution to moving goods and people around the region, their do nothing but transit philosophy does not provide for current or future needs.	Please see response to comment L12.ALT-1.
E108	N	1	Susan de Vries 10024 Slater Ave NE Kirkland WA 98033 susan@brightwave.com Agency: Public	I am extremely concerned about the summary of findings regarding long-term noise impacts in Table S-3 of this EIS - for all alternatives. The DEIS notes that long-term noise will be increased by any of the alternatives - and gives no plausible mitigation measures. I can only speak in detail for the area within a mile or so of the I-405 / NE 85th Street interchange in eastern Kirkland (I live in North Rose Hill, along Slater Ave NE). In people's yards, on the streets, and in the public area of Forbes Lake Park, the typical noise level is extremely unpleasant. Much of this noise apparently comes directly from the interchange, which is higher than the surrounding area and which has no noise barriers. As I read the DEIS, the increase in noise due to increased traffic will not be mitigated effectively (I'll explain this below). The DEIS does not seem to quantify the noise levels - how have they changed over the past 10 years? where will they be pegged with the different alternatives? An unquantified and unmitigated increase in this stress-inducing noise blight is simply unacceptable. I urge that you increase the level of mitigation, primarily by putting a lid over the I-405/NE 85th St interchange, turning it into a tunnel, or otherwise mitigating that point source of noise - and secondarily by increasing the height of barriers, planting further trees, or otherwise increasing the effectiveness of the existing barriers. Why do I believe that the proposed increase in noise will not be mitigated, at least in eastern Kirkland? The mitigation measures listed are the following.	Noise levels in the I-405 corridor vary widely depending on local topography, distance from the freeway, and daily traffic pattern in a specific area. The mitigation measures presented represent the range of measures that would be evaluated for each project element. Each of the measures may be appropriate for reducing noise levels in some part of the I-405 corridor; therefore, they are all described within the EIS. At this program level, there is not sufficient design detail to determine the noise effects of design options at specific locations. Mitigation measures, including traffic management measures, acquiring land as buffer zones, realigning the roadway, installing noise insulation in public use or nonprofit institutional structures, and constructing noise barriers or berms to reduce the noise at areas where noise impacts are determined would be evaluated as specific designs are developed for areas of the corridor.

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				- Traffic management measures: Frankly, I do not believe that these will decrease the total amount of noise. I do not hear people slamming on brakes or gunning accelerators most of the time; I hear a steady roar of near-constant-speed traffic. If the total number of vehicles increases, the total amount of noise will increase accordingly. I would be interested to hear of any studies that suggest that I am wrong about this! - Acquiring buffer land or realigning the facility: I can't believe this will happen. - Installing noise insulation in institutional structures; won't help my neighbors, me, or visitors to Forbes Lake (and, when it is developed, Forbes Lake Park). - Constructing noise barriers or berms; as the table notes, these are already in place through much of the corridor. More effective noise barriers (higher? more trees? covered with ivy?) would be welcome.	
E108	SOL	2	Susan de Vries 10024 Slater Ave NE Kirkland WA 98033 susan@brightwave.com Agency: Public	- A lid is mentioned in the text, but not in the summary table. I would welcome a lid over the corridor!	Lids will be evaluated at the project level as part of an overall environmental mitigation program.
E109	TR	1	Judy McMurtrie jmcmurtrie@nwtaxlaw.com Agency: Public	I commuted from Star Lake Park n Ride to downtown for several years before changing my employment to Bellevue. I ride in a carpool, which works out great. However, it's hard to find carpool connections, and if something happened to my current situation, I would be forced to take the bus, which is totally unacceptable. Why isn't there a more direct route from Federal Way to Bellevue? An hour and a half commute (at the least) is totally unacceptable.	Sound Transit provides regional transit--ST 565 travels from Federal Way to Bellevue in about an hour. Improved bus service is included in each alternative.
E110	O	1	Farjam Majd farjammajd@hotmail.com Agency: Public	1 Scope Since the Draft Environmental Impact Study (DEIS) is a lengthy and comprehensive document, I'll focus my comments only on the areas that interest me most, namely, fish and wildlife habitat in light of sustainability, extensibility, and likelihood of success of a given solution. 2 Introduction Transportation is a major activity in modern urban areas. At once, it is the lifeblood of modern life and economy by transporting people and goods from their sources to their destinations and one of the biggest consumers of environmental resources such as space and energy.	It was determined that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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				Transportation is not a problem in and of itself until it starts encroaching, with an ever-increasing scale, on our natural resources, time, and attention. It is easy, however, to fall into the trap of condemning traffic as an evil that has to be destroyed until we realize that it is also a necessity and source of much good in its role as the means of interaction between people and businesses, and without which, advancement would come to a crawl. This phenomenon can be readily observed in underdeveloped countries where a major obstacle to their progress is lack of roads and transportation systems preventing them from useful and frequent interactions with others that promote progress and advancement. Approaches to the traffic and transportation problem range from simple ad-hoc treatments such as leaving conditions as they are so they get worse and worse, and building roads as needed which sometimes lead to bigger problems than the ones they try to solve, to more meticulously planned solutions which consider future impact, sustainability, and extensibility for future needs. The latter is fortunately, I believe, the approach taken by our state. Of particular importance to me personally, and I believe to a great number of people, is the fate of nature and fauna and flora which are in competition for space and tranquility with our need for transportation. Unfortunately, both sides of this equation are essential and we cannot destroy one for the sake of the other. Therefore, we have to optimize our solution to serve both sides equally with respect and efficiency. My conclusions and recommendations are based on the data presented in DEIS. As such, I will not repeat the data in these comments in the interest of brevity. I will use the same abbreviations in my comments as used in the program text.	

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E110	TR	1	Farjam Majd farjammajd@hotmail.com Agency: Public	3 Discussion The core of our transportation problem is too much traffic for the available capacity. This problem can be solved in one of two ways, generally speaking. One is to reduce traffic and the other is to increase capacity, or any combination thereof. Of course to state the problem more accurately, the shortage in capacity is actually specific to time and space, that is, we are not short of capacity all the time and at all locations, but only at certain times and in certain places. According to the program data, about 250,000 new people will be moving to this area in the next 20 years. It is clear that traffic will not be reduced. However, it is also to be noted that population although directly proportional to traffic volume, is not the same thing. It is actually possible to reduce traffic volume even with increasing population by using more efficient means of mass transportation.	Thank you for your observations on the effects of growth.
E110	SOL	1	Farjam Majd farjammajd@hotmail.com Agency: Public	Most practical approach probably lies in a multi-faceted approach for reducing traffic and increasing capacity at the same time. The factors considered must be measured in relative terms rather than absolute. By a "relative" quantity I mean all other factors kept constant, the quantity is measured, in a manner similar to evaluating value of dollar taking into account the inflation rate. Some of the goals to consider are: · Reduce relative traffic volume · Increase relative transportation capacity · Decrease or maintain environmental impact (air quality, noise) · Decrease or maintain wildlife impact (flora, fauna, fish, plants, and habitat) · Solution foundation should be sustainable (don t need to spend increasing amounts of resources, economic and environmental, to keep the system operating) · Solution foundation should be extensible (can extend the same basic solution for increased future needs) · Increase or maintain transportation efficiency and productivity levels (transportation system provides same or higher level of service to people and businesses)	Thank you for your comment.
E110	AQ	1	Farjam Majd farjammajd@hotmail.com Agency: Public	It is clear that some of these factors are fundamentally opposing to each other (e.g. increased capacity and air quality).	In general, increased traffic delay, which may result from increases in traffic volume or decreases in capacity, results in increased pollutant emissions. Inversely, decreases in delay, whether a result of reduced traffic volumes or increased system capacity, result in decreased pollutant emissions.

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E110	O	2	Farjam Majd farjammajd@hotmail.com Agency: Public	Therefore, we face a problem of optimization, which basically means how to reach the best compromise for each of the desired factors. At its core, however, optimization will depend on the relative values a society places on each factor, which can only be assessed by informed and democratic vote of the people.	Thank you for your comment.
E110	SOL	2	Farjam Majd farjammajd@hotmail.com Agency: Public	Fortunately, our society here in northwest places a premium on the environment. As such, the solutions we adopt must be highly protective of the environment and minimize their impact while increasing or maintaining the level of service it makes available to the community. In the following sections, I'll briefly discuss why I think preservation of species and their habitat are, and should be, of prime importance to all in the long-run.	Thank you for your comment.
E110	O	3	Farjam Majd farjammajd@hotmail.com Agency: Public	3.1 Importance of species Unlike economics which impact everybody on a daily basis, various species of animals and plants do not concern most people in their daily lives. However, they absolutely do affect everybody in the long-run. There are three basic ways in which species of animals and plants affect people. One and the primary way is their genetic code and the information they contain. These information are unique, that is, they cannot be duplicated or re-acquired once lost, and they are extremely valuable, that is, they contain the very secrets of life itself. To allow loss of a species for short-term economic gains such as development or other uses of land is a moral crime of highest proportions. To make the point hit home, imagine if we burnt the pages of the only copy of Shakespeare's masterpieces existing in the world as fuel for fire. It would be true that it will warm us for a few hours, but it would do so at the expense of a literary masterpiece. And in reality, the genetic code of any animal is much more valuable than any work of art, no matter how gifted and esteemed the author. The second way animals affect humans are ultimately based on the first one but are more practical and that's the many ways they have and will, if allowed, contribute to health sciences. This contribution is accomplished by aiding scientific research and discovery of mechanisms for fighting diseases and/or discovering important drugs. Examples abound, such as bear's hibernation mechanism as a model for fighting kidney disease, shark's immunity to almost any infection and cancer, and many plants that have given us the opportunity to discover new drugs by studying their chemicals.	Thank you for your comment.

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				The third and most obvious is the direct use of animal products such as meat and other byproducts. Even in this way, biodiversity plays a very important role that cannot be achieved by mere prolific breeding of farm animals. There are many problems with highly domesticated species such as pigs and cattle due to increasing intolerance to disease and dependence on antibiotics for basic survival. Undomesticated animals can provide much needed genetic diversity that makes these animals more robust again. Additionally, new characteristics (such as leaner meat) may become desirable as our knowledge of nutrition increases requiring us to tap into the new genetic sources, namely, wild species, that is, if they have survived our encroachments into their worlds. 3.2 Importance of Habitat The importance of habitat comes into play in conjunction with the species of animals and plants. Animals and plants can develop and live successfully only in an undisturbed environment of sufficient size and resources to allow them to sustain themselves, develop, and reproduce. The size should be large enough to sustain a breeding population of a given species and maintain biodiversity thus preventing inbreeding and all the ailments resulting thereof. One way to ensure such size in proximity of a populated human habitat is to have pockets of protected areas interconnected with relatively undisturbed corridors for animals to move between these pockets, thus giving the effect of a larger habitat. Wetlands serve about 85% of all vertebrate animals in Washington, so their preservation is critical. Riparian areas play an equally important role in connecting isolated pockets of wetlands and other wildlife habitat. Therefore, we need to have the foresight to recognize that preservation of species and their habitat is of prime importance to all of us over the long run.	

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E110	SOL	3	Farjam Majd farjammajd@hotmail.com Agency: Public	3.3 Achieving Transportation Goals In order to achieve the transportation goals outlined above, we need to come up with solutions which are effective (that is, they actually solve the problem we are trying to tackle), have minimal negative impact on the environment and can actually improve it, and can serve as a robust and flexible foundation for future expansion. We can accomplish these goals by collecting data for evaluation of impact and having the political will to galvanize and organize people to support the solutions. At the same time the solutions have to be practical and not cumbersome so people will actually support and use them. Based on the data collected in DEIS, the following are some of my suggestions that I believe will help us achieve these objectives. 4 Solutions & Alternatives The following suggestions have some features in common with the four alternatives on the table in this program. However, I ll continue with my own line of analysis in the following sections. 4.1 Reducing Relative Traffic In order to reduce relative traffic, we can employ some of the following approaches:	Thank you for your comment.
E110	SOL	4	Farjam Majd farjammajd@hotmail.com Agency: Public	4.1.1 Zoning Change By changing some of the city zonings and allowing more residential units intermixed with business and commercial zones we can cut down on commute and need for cars or any transportation. Many European cities depend on this architecture for their continued thriving. Some large American cities use the same models with success as well such as Manhattan where apartment buildings are in relatively close proximity to small and large businesses.	Thank you for your comment.
E110	SOL	5	Farjam Majd farjammajd@hotmail.com Agency: Public	4.1.2 Telecommute Incentives We can further reduce commute traffic by encouraging telecommuting on several fronts. Corporations can be encouraged to institute telecommute programs for their employees, even on a part-time basis, by giving them tax benefits or other financial credits. Subsidized local offices with high speed internet access and computer and other office equipment can be provided for use by different companies and their employees for a fee. These facilities provide semi-telecommute solutions for long-distance commuters.	The proposed TDM program includes incentives for telecommuting. We will consider these specific ideas during the detailed design of the program.

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E110	SOL	6	Farjam Majd farjammajd@hotmail.com Agency: Public	4.1.3 Sprawl Reduction Urban sprawl increases amount and time of commute. If closer-in lands were renovated, re-developed, or re-conditioned, then more affordable housing would be available to people cutting the need for commute by more people. This approach has the additional benefit of improving inner city conditions, cutting down on crime, and rejuvenating old neighborhoods and businesses. All this cuts down on further habitat loss and encroachment.	The Preferred Alternative serves the goal of the Growth Management Act and adopted regional and local land use plans to reduce sprawl. It does this by focusing transportation and mobility improvements within Urban Centers and the urban growth area consistent with adopted land use and transportation plans. Please also refer to Sections 3.13 and 3.23 of the I-405 Corridor Program Final EIS for additional discussion of the relationship of the Preferred Alternative to land use and development within the study area.
E110	SOL	7	Farjam Majd farjammajd@hotmail.com Agency: Public	4.2 Increasing Relative Capacity The four alternatives proposed in this program mostly address our traffic problem by attaching the capacity aspect of our roadways. The capacity can be increased by the approaches listed below among others.	Thank you for your comment.
E110	SOL	8	Farjam Majd farjammajd@hotmail.com Agency: Public	4.2.1 Remove Bottlenecks Much of transportation capacity is wasted by bottlenecks. It doesn't do any good if we have five lanes through a section of a highway which at some point narrows to two lanes. The capacity will be dictated by the two lanes, not the five. Areas of high congestion that I personally have experienced are I-405 & 520 intersection, SR-520 & NE 148th, I-405 & NE 8th, and SR-520 bridge which backflows into both I-5 and I-405. Additionally, arterial ways like NE 148th and 24th are also constant points of congestion. DEIS data shows that addition of a few lanes in these strategic points where roads already exist have minimal environmental impact but can increase capacity by a substantial amount. An important point about bottlenecks is that they cause traffic backup affecting locations several miles away and waste existing capacity. So, no traffic program will be successful without removing these first.	Each of the I-405 action alternatives include fixing the many bottlenecks that occur. Some of these locations will be targeted for early implementation, while others will be improved as part of the broader corridor program. Related projects are underway to improve conditions on the SR 520 bridge and local arterials. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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E110	SOL	9	Farjam Majd farjammajd@hotmail.com Agency: Public	4.2.2 Modify HOV Functions HOV lanes are not the most popular traffic feature in our area. I have not heard many people praise them. Much of the time I see them sitting almost idle while other lanes are parking lots. I think we need to rethink their role and at least make them available in off-peak hours to relieve some of the congestion. The basic problem with HOV is that it is based on a bad assumption that people can carpool; most people can't, because their schedules and plans for the day do not match each other and they'll be stuck if they deviate from group's plan. If there were more efficient public transportation systems available (and I don't mean slow buses), then carpool might have been a more reasonable choice that it is now.	Thank you for your comment.
E110	SOL	10	Farjam Majd farjammajd@hotmail.com Agency: Public	4.2.3 Add More Bicycle Lanes We have a fair coverage for bicycles but by no means comprehensive. Additionally, use of bicycles are further hindered by long commutes. Bicycles are feasible alternatives if commute distances are on the order of 3 to 15 miles. Much longer distances simply takes too long. Therefore, use of bicycles can be increased if more close-in housing was available as suggested in the traffic reduction discussion above.	All of the action alternatives would provide improved bicycle connections and crossings of I-405. Please refer to Chapter 2, Appendix A, and Appendix B of the I-405 Corridor Program Draft EIS for a description of the action alternatives and the improvements that are contained in each.
E110	SOL	11	Farjam Majd farjammajd@hotmail.com Agency: Public	4.2.4 Add High Capacity Transit System (HCT) If done right, this is probably the most effective single solution. Of course it is also the highest impact solution for environment and riparian areas and wetlands as well, according to the DEIS data. However, its impact is a one-time deal mostly due to the fact that it needs its own dedicated guideway which will take up more room. But after that in the long run it will serve to increase capacity without addition of lanes like highways and by increasing speed, size, and improving technology for most part. Trains are by nature more efficient than either buses or cars. This efficiency can be defined as the ratio of energy and operating cost input to transportation capacity output it provides. A train may use 10 times the fuel of a car but carry a 100 times more people.	An HCT system as you described is similar to that evaluated as part of Alternatives 1 and 2. However, it was determined that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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				Many large cities around the world, including New York in US, could not function without their subways. They are much more efficient than buses which take up traffic lanes and have frequent stops, since they have their own dedicated lanes. The trick is critical mass. We have to start out with enough of a network coverage to make sense and people see how convenient it is to use them. If we simply have a few lanes connecting a few major centers, we still have the same problem we have today with public transportation: inconvenience and inefficiency (i.e. too much time to get form point A to point B). Once people start using it, the network can be expanded for more coverage. As more people start using HCT for daily commute and even shopping or other transportation needs, the number of cars and need for road expansion decreases further helping the environment and habitat.	
E110	SOL	12	Farjam Majd farjammajd@hotmail.com Agency: Public	4.2.5 Add More General Lanes More general lanes will be needed to accommodate more cars in both the short and long term. Initially, the lanes will satisfy the demand for transportation until HCT takes hold. In the long term, even with the existence of HCT there will be more population and more transportation needs. So, I think this is inevitable.	Thank you for your comment.
E110	SOL	13	Farjam Majd farjammajd@hotmail.com Agency: Public	4.2.6 Add More Express Lanes Express lanes will play the same role as general lanes except that they will be more efficient for long commuters. They serve the dual purpose of increasing capacity while separating the long commuters from the short commuters by avoiding congestion and interference resulting from too many access points they don t need in the first place.	Thank you for your comment.
E110	SOL	14	Farjam Majd farjammajd@hotmail.com Agency: Public	4.2.7 Low Cost Taxi Service Large metropolitan areas the world over employ a lot of taxis. For short hops they can be very flexible and efficient and can take the place of personal cars at reasonable cost when you consider parking, fuel, time, and depreciation costs of private transportation. A subsidized taxi service in crowded areas, where people can just wave a hand and catch a cab, can be an efficient means of transportation.	This idea has not yet been studied within the program. It may become a viable strategy to include within the TDM incentives program.
E110	O	5	Farjam Majd farjammajd@hotmail.com Agency: Public	5 Conclusions & Recommendations My comments here are short and to the point. I have relied on the data presented in DEIS document for my conclusions and have not done any independent quantitative research. I have outlined a fairly comprehensive set of solutions which address both causes of congestion, namely high traffic and low capacity	Thank you for your comment.

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E110	TR	2	Farjam Majd farjammajd@hotmail.com Agency: Public	My suggestions cover some grounds which have not been considered in any of the four proposed alternatives. Most notably, I have suggested eliminating some of the causes of high traffic such as far away urban residential areas necessitating long and frequent commutes. Additionally, I have directed attention to the fact that I-405 Corridor solutions cannot be implemented in isolation. Other factors such as inner-city congestions and bottlenecks cause traffic backups affecting far away points in traffic.	The alternatives were coordinated with other plans in the region including the MTP, and other sub-area and corridor studies.
E110	SOL	15	Farjam Majd farjammajd@hotmail.com Agency: Public	I believe alternative 2 in this program is the closest match with my recommendations. Although, I strongly urge you to consider the other suggestions I have outlined here which are absent from any of the alternatives, especially means of cutting down traffic such as slowing urban sprawl and re-developing inner city lands for residential use.	Thank you for your comment.
E111	ALT	1	Anne Foltz Anne.Foltz@Honeywell.com Agency: Public	I cast a vote for the preferred alternative 3.	Please see response to comment L12.ALT-1.
E112	ALT	1	Leon Roberts leroberts@tiaa-cref.org Agency: Public	I endorse the "Preliminary Preferreed Alternative" for the 405 congestion. I have been a Washington State resident my entire life and currently live in Bothell. It takes me 45 minutes to travel 8 miles to my office located in Kirkland. I would like to see a plan that would best fit the needs of those who use the 405 corridor on a daily basis no matter what the cost is personally. I don't wish to spend that much time sitting in traffic all over the area. Thank you for your time and effort spent on this project.	Please see response to comment L6.ALT-1.
E113	O	1	Eric S. Beckendorf, Bellevue ericbeckendorf@hotmail.com Agency: Public	My name is Eric Beckendorf and I am writing this comment as a concerned citizen who has lived in the Pierce-King County area for over twenty years. Having read the Draft EIS recently, I must commend the agencies involved with what appears to be a very thorough and well thought out first step to a problem that no one in the Eastside area cannot relate to. In this comment, I hope to use my experiences as a resident, a concerned citizen, and a commuter to demonstrate which I-405 alternative will work best for the community. Before I begin an analysis of the alternative best suits the community, I would like to introduce a few general comments and questions for consideration.	Thank you for your comment.

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E113	SOL	1	Eric S. Beckendorf, Bellevue ericbeckendorf@hotmail.com Agency: Public	First of all, although I believe that the introduction of some additional lanes to both I-405 and part of SR 167 is essential to lessening the inevitable increase in congestion over the next twenty yeats, the focus on of any I-405 alternative should not be in a general increase in the number of general use lanes (as in alternative four). One of the problems with living in a Western state is the mistaken belief that there is endless space for growth and development. Since the mid 1960's, voters in the state of Washingtion have continually rejected legislation that would have created transportation alternatives. Now that the situation is out of hand, the natural inclination is to simply enlarge freeways and arterials. However, this sort of thinking merely perpetuates the problem; eventually the infrastructure will be saturated and even new freeways and arterials will be overtaxed. This is especially true given the limited space for growth in the Puget Sound corridor. There is roughly 60 miles between Puget Sound and the Cascades and 100 miles between Everett and Olympia. This is an incredibly small amount of space to fit in what will eventually exceed 3 million people. Therefore, any alternative plan for I-405 must contain alternatives (as do alternatives 1 and 2) that will allow for a decrease in congestion without a massive increase in freeway lanes, which will only solve the problem for a short time. In addition, the midset of Northwesterners must change. No longer will residents be able to singly drive cars by the hundred thousands and expect to get anywhere fast. There must an efficient means of fast transport that the average car owner will feel comfortable using instead of a car.	Thank you for your comment.
E113	LU	1	Eric S. Beckendorf, Bellevue ericbeckendorf@hotmail.com Agency: Public	Secondly, I question what seems like a summary rejection of an alternative freeway that would traverse rural King County. The suggestion that this freeway would encompass SR 18 seems reasonable being that SR 18 has already been expanded into four lanes for over half of its length (and this construction seems to be reaching closer and closer to the Tiger Mt. area, regardless of any environmental impacts). Secondly, the idea that the areas covered by a new potential freeway would traverse rural areas of King County is quite true, but will these areas be rural in twenty or thirty	The I-605 or "CONEKC" proposal was a separate transportation study. That freeway was considered in the screening of alternatives and not included due to the location outside of the Urban Growth Area. It was determined, due to the lack of actual north-south travel time savings, the environmental impacts, and the costs, that it did not meet the purpose and need of the I-405 Corridor Program. Additionally, the initial land use and environmental analysis indicated a level of densities and development that would not be consistent with the regional policies.

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				years hence? After all, I-405 was originally created as only an alternate route to I-5; that was about thirty-five years ago. It is not unreasonable to assume that many rural areas of King County (as is evidenced by the explosive increases in population is such 'rural' cities as Isaquah and North Bend) will be considerably suburban in the next several decades. Therefore, I think the pertenent agencies should reexamine their rejection of a new freeway in rural King County, it may be the only alternative in the very near future.	
E113	AQ	1	Eric S. Beckendorf, Bellevue ericbeckendorf@hotmail.com Agency: Public	Next, I have a question. Reading the projected pollution levels caused by each alternative, I find it hard to believe that the rapid tranisit alternatives are projected to create as much pollution as the general use alternatives. If a rapid transit system were introduced, wouldn't the resultant decrease in automobile traffic result in signficantly less pollution? Over the last twenty years, the air quality in the Northwest has continually worsened due to the increase in automobile traffic. Are the reports assuming that rapid transit systems would not decrease automobile traffic? I am curious as to why this is so.	Over the past twenty years, air quality has improved in the Puget Sound region as a result of cleaner automobiles and improved regulation of industrial sources. This can be seen in pollutant trends graphs in Section 3.23.4.1 of the Final EIS. Pollutant emissions are affected by many factors, the main ones being traffic volume and traffic speed. While traffic volume would be less under the transit alternatives, speed would also be reduced because of congestion on the roadway system. As a result, the emissions per vehicle would be higher and would offset the improvements that would result from the reduced traffic volume.
E113	ALT	1	Eric S. Beckendorf, Bellevue ericbeckendorf@hotmail.com Agency: Public	As I have already explained why I dislike the idea of a massive increase in general use lanes, alternative 4 can already be discounted. Alternative 3, although slightly better than alternative 4 due to its increased emphasis on bus transit service and HOV improvements, still focuses on an increase in general use lanes. In my opinion, Alternative 2 is the best option. Not only does alternative 2 increase I-405 by one lane each way, but it also allows for the creation of an fixed-guideway HCT system. It is my belief that this system represents the only sustainable future for the Eastside and must be implimented.	Please see response to comment E31.ALT-1. Development of a new east King County freeway corridor was not advanced for further consideration as part of the I-405 Corridor Program for the reasons discussed in Section 2.2.7 of the I-405 Corridor Program Draft EIS. This does not preclude future consideration of a rural King County freeway as part of another study.

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				There are several reasons I feel that an HCT system an essential part of any working I-405 alternative. First of all, there is the environmental consideration. If less people are using cars, less carbon monoxide will be released into the atmosphere, hence making the northwest a little more livable. In addition, I-405's proximity to a number of important waterways and wetlands would warrant the implimentation of a plan that would maximize the reduction of urban runoff. This is not something that seems to be part of the EIS; however, urban runoff accounts for a signficant portion of water pollution in the Puget Sound area. It is especially signifcant considering the number of large roadways that are close to Puget Sound as well as the amount of rain this area recieves. The construction of an HCT system would reduce the amount of pollution entering our waterways and wetlands, which are home to a number of federally protected species. Secondly, an HCT system is the first step in altering a mindset that is no longer plausible in today's world, the idea that everyone must singly drive their cars everywhere they go. In most major cities, especially on the East Coast, the majority of residents do not drive to work by themselves. They either use existing transit systems or they car pool. In the West, however, we still seem to be convinced that everyone must have their own car and drive it to and from work every day. This concept may have worked in the 60's and 70's, but the fact that commuters spend several hours every day traversing a twenty mile stretch is ridiculous. As in so many other areas, the government must show the common man that there is an alternative. If residents are presented with the option of sitting in traffic for two hours, or travelling via rapid transit in fifteen or twenty minutes, it is obvious which chose they will make.	

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				This option will educate residents about the obvious benefits of rapid transit, it is allows difficult to communicate public good on a ballot that with the words 8.2 Billion Dollars on it. In this case, residents will be able to avoid the stress of a commute and help the environment as well. Finally, alternative two is superior to alternative one in that it also increases the size of I-405 and a substantial amount of SR 167 by one lane. This allows those who continue to wish to use their cars the option to do so under less stressful conditions while retaining the option of rapid transit. Also, the increasing I-405 by one lane is considerably less impactful than an increase of two or three lanes. Altough the environment will be impacted by any increase in roadway size, alternative two minimizes this impact by offering alternatives that will most likely please everyone. In summation, I feel that alternative 2 will best serve the interests of commuters, the environment, and the community as a whole. I urge that this alternative be adopted and that the idea of a rural King County freeway be reconsidered.	
E114	O	1	Eva Hilborn Eva.Hilborn@vopakusa.com Agency: Public	I welcome any action to improve the commute! I spend so many hours of my life on I-405!	Thank you for your comment.
E115	ALT	1	Luke Sankey Luke.Sankey@Honeywell.com Agency: Public	I would like to add my input to what should be done to relieve traffic congestion on 405. Everybody knows that traffic sucks at virtually all times of the day on that road. It is my understanding that there are 5 proposed alternatives for developing the corridor, and after reviewing all 5, I would like to say that the best solution I can see is solution number 3, which would add 2 general traffic lanes in each direction, develop improved 405 bus systems, and alleviate problem areas such as near 167 in Renton. I believe that this would be most effective in reducing traffic now and in the future, as traffic will surely only become worse. Sources: http://www.moveon405.com http://www.405solutions.org	Please see response to comment L12.ALT-1.
E116	ALT	1	Ned Kennedy Bellingham, Wa ned-kay@netos.com Agency: Public	As a frequent user of Interstate highway system between Bellingham and Tacoma I'm in favor of Alternative 3 as the best, most cost effective, proposed solution for reducing congestion and improving mobility on I-405. Please support Alternative 3.	Please see response to comment L12.ALT-1.

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E117	O	1	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	After reviewing the information contained in the Draft Environmental Impact Statement from your website, I would like to offer some comments and recommendations regarding the I-405 Corridor Program. I commute along I-405 each weekday from Kirkland to my job in Bellevue. In the evenings, I continue my commute to downtown Seattle in the evening for classes via the I-90 Bridge and then return home via I-5, the 520 Bridge and northbound I-405 to my townhouse in Kirkland. Thus, I am very interested in the I-405 Corridor Program, which currently has pending improvements, and feel I can offer the prospective of a current homeowner, taxpayer and daily commuter. First, I have evaluated the overall goals of the I-405 Corridor Program, and offered some comments about these goals and the three committees involved. Secondly, I discussed several items which may have possibly been overlooked or not addressed in by the program. Next, I developed a "pros and cons" list as backup for each of the four major alternative solutions (excluding the No Action alternative), to help me identify which alternatives represent the most viable options. I have offered some comments regarding each alternative. Finally, I have concluded with a short summary with my thoughts about the overall program. My goal was to provide you with some unbiased feedback to use when going forward with your final decision regarding the I-405 Corridor Program. Thank you for the opportunity to be heard on this issue.	Thank you for your comment.
E117	O	2	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	Overall Goals of the I-405 Corridor Program Enabling Acts delegating power to the Agencies: National Environmental Policy Act (NEPA) and Washington State Environmental Policy Act (SEPA). SEPA states that it shall be the duty and function of the Department of Ecology to adopt and amend the rules of interpretation and implementation, subject to the requirements of chapter 34.05 RCW, for the purpose of providing uniform rules and guidelines to all branches of government including state agencies, political subdivisions, public and municipal corporations and counties. The proposed rules shall be subject to full public hearings requirements associated with rule promulgation.	Thank you for your comment.

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				NEPA purposes are: "to declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man; to enrich the understanding of the ecological systems and natural resources important to the Nation; and to establish a Council on Environmental Quality." Goals of the I-405 Corridor Program: q Reduce traffic congestion; q Fix key choke points such as the I-405 interchanges at SR-167, I-90 and SR-520; q Seek opportunities to enhance environmental quality; q Enhance livability for communities within the corridor; q Support a vigorous state and regional economy by responding to travel needs; q Accommodate planned regional growth 3 Committees identified to participate in feedback and decision-making of the project: 1) Citizen Committee: interested citizens representing a wide range of business, environmental, community feedback, technical support and guidance. 2) Steering Committee: technical staff from area municipalities, environmental agencies and transportation providers will identify and screen possible solutions and present findings to the other committees. 3) Executive Committee: local, state and federal officials will make the final selection of solutions, using input from the public and other committees. These solutions will then be incorporated into local and state transportation funding proposals that will later be voted on by the general public. Personal opinion: I think the NEPA purpose statement and the guidelines from SEPA appear overly broad when delegating power to the agencies and the committees to work the I-405 Corridor Program. The agencies and committees are left with great discretion on how to formulate the rules for accomplishing the project. This may later leave the door open for challenges to the way the agencies have set up and conducted the program.	

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E117	O	3	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	Personal opinion continued: The three public open house/hearings were scheduled for September 18, 2001 in Bothell, September 19th in Renton and September 20th in Bellevue from 7:00 p.m. to 9:00 p.m. These hearings were not very widely announced, and I personally did not hear of them until after I went to your website for information about the project, at which time they had already been conducted. It is important that the public has an opportunity to be heard where opinions can become part of the public record and feedback can be obtained by both the committee members along with questions answered for those affected by the changes.	Please refer to response to comment E9.O-2.
E117	O	4	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	To be consistent with the goals outlined in the congressional declaration of purpose for NEPA, I think it is imperative that the final decision must choose the best alternative plan that will minimize damage to the environment and limit depletion of natural resources of the nation and local region.	Please refer to response to comment L49.O-5.
E117	O	5	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	Possible items overlooked by the I-405 Project: q Was proper notice given and sufficient public hearings provided by the I-405 committees? Comment: As a resident of the I-405 corridor area, I am concerned that not enough notice has been given to the general public so their opinions can be heard at hearings. I have not received any mailings or seen any television commercials announcing public hearing times and locations, so I am wondering if the people affected will have fair representation when the final decision(s) are made.	Please refer to response to comment E9.O-2.
E117	O	6	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	q How were the members of the three committees selected? Does the general public have equal and fair representation on the citizen committee in particular? Comment: A fair representative sampling of citizens cold have been selected through a lottery drawing, by soliciting volunteers (without ties to financial or political causes) may have been a better solution or a certain percentage from each township to serve on the citizen committee. The bottom line is the general public needs to have fair representation.	The I-405 Corridor Program is a WSDOT-sponsored, community-based partnership. Decision-making is guided by three committees: a Citizens Committee of people representing a wide range of interests all along the corridor, a Steering Committee of senior level staff, and an Executive Committee of federal, state, regional, and local elected and appointed officials from agencies and jurisdictions with an interest in the corridor.

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					Members of the three committees were invited by WSDOT to participate in the program with the goal of having representation from all of the jurisdictions and agencies in the corridor. The members of the Citizens Committee were chosen by members of the Executive Committee. Membership on the 40-person committee represents a broad spectrum of public perspectives, including neighborhood, business, environmental, and modal interests. The Citizens Committee was charged with providing community-based feedback and recommendations to the program to ensure a wide range of interests were involved and considered in the decision-making process.
E117	TR	1	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	q Several of the Alternatives make certain assumptions such as commuter preferences and traffic growth that may not reflect reality. How do we know that people prefer a monorail system, for example, versus adding more commuter and car pool lanes? Comment: I would have like to have seen a general survey of the people who live within the I-405 corridor to see what their opinions and ideas were for improving the problems.	The public outreach program did conduct a telephone survey of people in the corridor asking for their opinions and preferences.
E117	TR	2	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	q Why does the monorail system in Alternatives 1 and 2 not end up in the downtown Seattle area where a many people work every day or visit versus ending on the other side of the bridge by Lake Washington? Comment: It seems like it would have been more beneficial for commuters to be able to go round trip from Kirkland or Bellevue to Seattle downtown and back rather than arriving at the other side of Lake Washington and having to find other transportation the rest of the way downtown. Why did the plans not add on to the existing monorail system already established in downtown Seattle and extend to the outlying areas? This makes more sense to me. There would be a trade-off between paying for premium parking downtown and the cost of riding the monorail (not to mention saving money on gasoline). The monorail could have also made a stop between the Safeco field and the new football stadium to alleviate traffic and parking congestion for sporting events.	As noted in FEIS Sections 2.2.2 and 2.2.3, the HCT systems in Alternatives 1 and 2 would include service to Seattle. An implementation plan has been prepared that gives priority to the identified bottleneck locations, such as those identified in the comment. Please refer to responses to comments E105.SOL-1 and L52.SOL-7.

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E117	TR	3	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	q It seems like the data and alternatives did not offer information on any short-term solutions that might improve the congestion somewhat now instead of waiting until the year 2016 or later to get any relief. There were also no details on how the project would be phased in or where the construction might start to give the public an idea of the amount of disruption that each alternative will pose on our daily lives in the interim while improvements are made to the I-405 corridor. Comment: I think people (including myself) who commute on I-405 every day would want to know these details in order to vote on the alternatives effectively.	The FEIS (Section 2.2.7.2) includes additional information on likely phasing of the Preferred Alternative. Scheduling of project phases will emphasize improvements to short-term problems in the context of a long term solution. Some interim projects may be undertaken as part of this effort.
E117	COST	1	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	q How much will the average taxpayer have to pay for the improvements? Comment: I would have liked some information on how the Alternatives are going to be funded; hence how much will the average tax payer have to pay for the improvements before we take a vote?	Funding will most likely come from a variety of federal, state, regional, and local sources. If projects are funded by voter approval, ballot information materials will provide an estimate of typical annual costs for individuals or households. Because funding has not been approved, it isn t possible to estimate the potential tax impacts on an average citizen.
E117	O	7	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	q The charts used to compare the alternatives were rather complicated for the average "layman" to interpret. The summary charts could have been more descriptive on what they meant. For example, what is the difference between potential number of "riparian encroachments" versus potential number of impacted "jurisdictional shorelines" on two of the charts? Comment: I am sure the charts were meaningful to the members of the committees on the project, but they were rather hard for the general public to understand the context on some of the charts.	The EIS text has been changed to better explain the charts. The charts were intended to be used for a general comparison.
E117	ALT	1	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	Pros and Cons to the Alternatives: Alternative 1 (High Capacity Transit & Transportation Demand Management): This first alternative provides a separate light rail, monorail supported by feeder buses and expanded strategies to encourage car pool and van pool use. Pros:	Thank you for your observations. Alternative 1 - HCT/TDM Emphasis, and Alternative 2 - Mixed Mode with HCT/Transit Emphasis, both include a physically separated, fixed-guideway high-capacity transit system potentially using some form of rail technology within portions of the BNSF right-of-way. No more definitive decision has been made regarding the type of technology that would be employed. Pro #7- Safety for Alternative 1 is actually

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				1) Doubles bus services 2) HOV lanes added to key arterials connecting with I-405 3) Expanded pedestrian and bicycle facilities 4) Reduced congestion at choke points like SR-167 5) High Capacity Transit connecting urban centers 6) Cost is $5,317M, but lowest cost of the 4 alternatives offered 7) Improves safety of high accident locations by at least 50% 8) Highest reduction in Congestion of the 4 alternatives 9) The least impact to the Noise level of the 4 alternatives proposed 10) The least impact to the Fish & Aquatic Habitat (riparian encroachments) 11) The least impact for Runoff due to new paved surfaces 12) The least impact to Water Resources (potential decrease in groundwater recharge) 13) The least impact to Wetland Areas 14) The least impact to Major Utilities (pipelines, sewer lines, fuel pipelines and electrical lines) 15) The least impact to Recreational Resources (parks) 16) The least impact to Construction Energy Consumption 17) The least impact to Potential Displaced Units (residential and non-residential) 18) The lowest in Operational Energy Consumption Cons: 1) Assumes people prefer mass transit and carpools over autonomy of driving own vehicle 2) Park-and-ride and transit centers have to be added to support this alternative 3) Least Mobility Improvement (daily trips accommodated) of the 4 alternatives by year 2020 4) Most damaging impact to the Air Quality (pollutant emission) of the 4 alternatives Personal thoughts about Alternative 1 (Pros 18 and Cons 4): This alternative has many positives versus few negatives, and is great for people who want to rely on the bus or monorail system. But for those people who desire or require the flexibility of driving their own cars to work and school, this solution offers little relief to the drivers of private vehicles. I just do not think this option offers enough relief to address the concerns of the congestion on I-405. This is the typical example of "cheapest is not always the best" solution to the problem.	improved by 32-40 percent, not 50 percent (DEIS page 3.12-27). Pro #8- The DEIS documents that Alternative 1 provides the least reduction (not the highest) in congestion of the action alternatives. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.

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E117	ALT	2	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	Alternative 2 (Mixed Mode with High Capacity Transit): This second alternative provides a separate monorail system with connections to local buses similar to Alternative 1. In addition, basic safety improvements are made and one general-purpose traffic lane would be added each direction. Pros: 1) High capacity transit connecting urban centers 2) Bus service doubled 3) Adds one general-purpose traffic lane both directions on I-405 along with fixing "bottleneck" locations 4) HOV lanes added to key arterials connecting to I-405 5) Direct HOV ramps added along I-405 6) Arterial improvements by local agencies 7) Freight mobility improvements 8) Expanded pedestrian and bicycle facilities 9) Expanded Intelligent Transportation Systems (metered lights, etc.) 10) Second most effective on Congestion Reduction 11) Second lowest for Noise impact 12) Second lowest for Construction Energy Consumption 13) Second lowest impact to Wetlands 14) Improves High Accident Locations on I-405 by 50% Cons: 1) Added park-and-ride and transit centers to support HCT 2) The second least effective on Mobility Improvement (daily trips accommodated) 3) Second highest in Cost at $8,633M 4) Second biggest impact to Air Quality 5) Highest damage to Fish & Aquatic Habitat (riparian encroachments) 6) Second highest Runoff impact (new paved surfaces) 7) Second highest impact to Water Resources (decrease in groundwater recharge) 8) Ties with Alternatives 3 and 4 for high impact to Recreational Resources (Parks) 9) Highest impact to Major Utilities (number of water, sewer, electrical and fuel lines) 10) Highest impact to Potential Displaced Units (residential and non-residential) 11) Ties with Alternative 3 for second highest Operational Energy Consumption	Please refer to the response to your comment E117.ALT-1. Pro #14- Safety for Alternative 2 is actually improved by 60 to 80 percent, not 50 percent (DEIS page 3.12-27). Pro #8- The DEIS documents that Alternative 2 provides the second lowest (not the highest) reduction in congestion of the action alternatives.

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				Personal Thoughts about Alternative 2 (Pros 14 and Cons 11): This alternative off a few more pros than cons, but they are pretty evenly weighted. This option just appears to be too costly and also too damaging to the environment for the benefits received in the improvements. It will have the most disruption of any of the alternatives regarding people, businesses and the environment. I would absolutely not vote for this option as a taxpayer and citizen.	
E117	ALT	3	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	Alternative 3 (Mixed Mode): The third alternative provides a Bus Rapid Transit system with expanded bus service, two additional general-purpose traffic lanes each direction on I-405, plus widens SR-167. Pros: 1) Bus Rapid Transit system connecting urban centers along I-405 2) Bus service doubled 3) Adds two general-purpose traffic lanes each direction to I-405 4) HOV and general traffic lanes added to key arterial corridors 5) Direct HOV ramps added along I-405 6) Arterial improvements by local agencies 7) Freight mobility improvements 8) Expanded pedestrian and bicycle facilities 9) Expanded Intelligent Transportation Systems (metered lights, etc.) 10) The second most effective on Mobility Improvement (daily trips accommodated) 11) Improves High Accident Locations on I-405 by 50%, plus other state/local routes 12) Second lowest Cost of $6,797M 13) Second lowest impact to Air Quality 14) Second lowest damage to Fish & Aquatic Habitat (riparian encroachments) 15) Second lowest Runoff impact (new paved surfaces)	Con #2- Alternative 3 is the second most effective (not ineffective) at congestion reduction.

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				16) Second lowest impact to Water Resources (decrease in groundwater recharge) 17) Second lowest impact to Major Utilities (water, sewer, electrical and fuel lines) 18) Truck freight traffic improvements highlighted Cons: 1) Added park-and-ride and transit centers to support Bus Rapid Transit system 2) Second most ineffective on Congestion Reduction 3) Second highest for Noise impact 4) Second highest impact to Wetlands 5) Ties with Alternatives 2 and 4 for highest impact to Recreational Resources (Parks) 6) Second highest impact to Potential Displaced Units (residential and non-residential) 7) Ties with Alternative 2 for second highest Operational Energy Consumption 8) Second highest for Construction Energy Consumption Personal Thoughts about Alternative 3 (Pros 18 and Cons 8): This alternative offers far more advantages than disadvantages so it offers the most improvements for the least amount of cost. It also entails the least impacts to natural resources and nature than most of the other alternatives. I prefer this alternative above the other alternatives because it improves private commuter congestion, offers wider bus services for those who prefer to use public transportation, minimizes cost expended, and preserves natural resources and the environment.	

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E117	ALT	4	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	Alternative 4 (General Capacity): This fourth alternative provides one additional general-purpose lane and two express traffic lanes each direction on I-405 (six new lanes total), widens SR-167 and arterial streets, and makes moderate transit improvements. Pros: 1) One additional general-purpose traffic lane added in each direction to I-405 2) Two additional express lanes in each direction added to I-405 3) Arterial improvements planned by local agencies 4) General traffic lanes added to key arterial corridors 5) Bus service increased by 50% 6) Additional HOV lanes 7) Expanded Intelligent Transportation Systems (metered lights, etc.) 8) Improves High Accident Locations on I-405 by 50%, plus other state/local routes 9) Highest alternative for Mobility Improvement (daily trips accommodated) 10) Least impact on Air Quality 11) Second lowest impact on Potential Displaced Units (residential and non-residential) Cons: 1) Least effective on Congestion Reduction 2) Most expensive Cost alternative at $11,333M 3) Highest impact on Noise 4) Second highest impact to Fish & Aquatic Habitat (riparian encroachments) 5) Highest impact to Runoff (new paved surfaces) 6) Highest impact to Water Resources (groundwater recharge) 7) Highest impact to Wetlands 8) Ties with alternatives 2 and 3 for highest impact to Recreational Resources (Parks) 9) Second highest impact on Major Utilities (water, sewer, electrical and fuel lines) 10) Highest impact to Operational Energy Consumption 11) Highest impact to Construction Energy Consumption	Alternative 4 - General Capacity Emphasis, was considered a reasonable and feasible alternative that could meet the purpose and need for the program. As you have observed, it has a unique focus among the transportation solutions and it typically ranks either best or worst for many of the evaluation measures. Con #1- Alternative 4 is the most effective (not least effective) at congestion reduction.

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				Personal Thoughts about Alternative 4 (Pros 11 and Cons 11): This alternative offers a dead even split between pros and cons, and frankly appears to be "overkill." Why would we need so many HOV lanes when the ones we have currently are not always being used? The high cost of this alternative (more than double the cost of Alternative 1) along with the damage it does to the environment make it my absolute last possible choice of all the alternatives presented. It is unbelievable how this option would drive up the cost of major utilities and use up our energy supply, which is already in a state of deprivation. This Alternative 4 is really should not be an alternative at all!	
E117	ALT	5	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	No Action Alternative: Basically, picking this alternative would make no more changes or improvements to alleviate the congestion problem facing I-405 above the already funded and committed plans totaling $677M, which provide for limited state highway expansion and increased transit service hours.	Thank you for your comment.
E117	ALT	6	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	Scheduling timeline of the four Alternatives: A preliminary construction schedule compares the timeline of the alternatives being proposed as follows: Alternatives 1 and 2 could potentially be completed a few years earlier around 2016. Alternative 3 shows that final construction could be completed by year 2018. Alternative 4 could take up to five years longer than Alternative 3 around 2023.	Thank you for your comment.
E117	ALT	7	Deborah Mosshart 10120 NE 115th Lane Kirkland, WA 98033 deb.nash@boeing.com Agency: Public	Summary: I believe we have to choose an option that does more than the No Action Alternative to solve the congestion problems which spawned the I-405 Corridor Program in the first place. My vote is for Alternative 3 as a first, premier choice because it offers the best bundle of benefits within reasonable cost yet results in less negative impacts to the environment and less depletion of our natural resources. This is consistent with NEPA's congressional declaration of purpose, which encourages limiting damage to the environment and biosphere while stimulating the health and welfare of society.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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				Alternative 2 gets my vote as the runner up for the best possible solution to the I-405 Corridor Program because it even though it costs 27% more than Alternative 3, it does offer a wide variety of transportation modes (monorail, bus system and one additional general-purpose traffic lane in each direction) that would seem to accommodate different lifestyles of the general public. Due to its varied modes of transportation, I prefer Alternative 2 above Alternative 1 because it seems to better serve the interests of the general public. Although we will have to wait a few years longer for Alternative 3 (estimated completion 2018) if picked over Alternative 2 (estimated completion 2016), I believe the overall benefits of lower cost and less negative impacts to the environment are worth it. Alternative 3 seems to be more in line with the goals and guidelines established by NEPA and SEPA, which gave the power to the agencies and committees to act and carry out the planning associated with the I-405 Corridor Program. Thank you for the opportunity to voice my comments regarding this mammoth project.	Please refer to the response to your comment E117.ALT-1 regarding HCT technology. For your information, the Elevated Transportation Company recently published estimated monorail construction costs in the City of Seattle. These costs ranged from $69 to $124 million per mile for a 14-mile elevated system. These costs were similar to the fixed-guideway transit system costs evaluated in Alternatives 1 and 2 in the Draft EIS.
E118	ALT	1	Stephanie L. Grassia slgrassia@psfinc.com Agency: Public	In response to your call for comments on the I-405 Corridor Draft EIS, I am writing this letter to express my support for Alternative 1, which would provide high capacity transit (HCT) and transportation demand management (TDM). Alternative 1 will best accomplish the program need to "improve personal and freight mobility and reduce foreseeable traffic congestion in the corridor in a manner that is safe, reliable, and cost effective."	Please see response to comment E15.ALT-1.
E118	TR	1	Stephanie L. Grassia slgrassia@psfinc.com Agency: Public	There are three main reasons why Alternative 1 should be selected over the others. First, Alternative 1 will initiate a rail system in the Puget Sound region. Our transportation problems will never be solved without high capacity transit, and HCT should be added soon before the cost becomes even more prohibitive. Alternatives 3 and 4 are not worthy of consideration because they do not include a rail system. These alternatives are shortsighted; although they may solve congestion for the next 20 years, they do nothing to address the ultimate need for an alternative to the automobile.	Thank you for your comments on the advantages of rail.

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E118	COST	1	Stephanie L. Grassia slgrassia@psfinc.com Agency: Public	Second, Alternative 1 is the least expensive. In light of the huge cost overruns already incurred by Sound Transit, the public has lost confidence in government's ability to implement working solutions to our traffic problems. We should start with a manageable project such as Alternative 1, get it successfully implemented, and then reevaluate other options for increasing capacity based on available funding. We can always add other improvements later if the public is willing to bear the cost. This alternative will allow construction to take place in phases, unlike Alternative 2, which is more expensive and tries to do too much. Furthermore, in light of the already ailing economy, made worse by the September 11 tragedy, the State is projecting a budget shortfall. It will receive less revenue from sales taxes because of the lack of consumer confidence. With declining tax revenues, legislators will cut money across the board, including those dollars earmarked for transit.Due to the reduction in available revenue, the Department of Transportation should try to implement the least expensive alternative to ensure that it will be able to pay for the work and any cost overruns that might develop.	Thank you for your comment. PSRC's *Destination 2030* Metropolitan Transportation Plan is focused on meeting multimodal transportation needs based on growth in population and employment through the year 2030. Project elements from the I-405 Corridor Program's Preferred Alternative will become part of the plan. It is appropriate to plan for the future and to expect that federal, state, regional, and local governments and the public will decide whether to provide funding to implement the plan.
E118	O	1	Stephanie L. Grassia slgrassia@psfinc.com Agency: Public	Third, Alternative 1 has the least environmental impact. Five of the six major environmental issues outlined in the draft EIS strongly favor Alternative 1. Seattle, surrounded by mountains, water, and greenbelts, is attractive largely because of its beautiful environment and wildlife. Our natural resources should not be sacrificed in order to improve traffic congestion, turning our city into another asphalt jungle. It is very difficult to restore nature once it is destroyed. We need to balance our desire to travel safely and efficiently with the necessity of protecting our environment to ensure that future generations can enjoy what we've come to appreciate about the Pacific Northwest.	Thank you for your observations and comments concerning Alternative 1. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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E118	TR	2	Stephanie L. Grassia slgrassia@psfinc.com Agency: Public	Citizens in this area, especially on the eastside, are too attached to their cars. In order to wean them away from automobiles, there needs to be a more attractive way to get from here to there. The current bus system is too inconvenient. As an illustration, it takes one bus approximately 30 minutes to commute 13 miles to downtown Seattle from Issaquah. However, to reach Bellevue, only seven miles away from Issaquah, it takes three buses about an hour and a half! More bus service needs to be added; Alternative 1 does this.	The Preferred Alternative includes an increase in transit service of approximately 70 percent compared to the current King County 6-year plan.
E118	TR	3	Stephanie L. Grassia slgrassia@psfinc.com Agency: Public	Although no one cares to talk about it, another problem with bus service is the perceived notion that it is a "second class" way to travel. Wealthy people are unwilling to trade the status, comfort, and luxury of their Mercedes Benz for a crowded, dirty bus. However, they will take public transit if it has enough "sex appeal," (i.e., monorail or bullet train). When adding bus service, we should consider acquiring "nicer" buses, such as the type used for Snohomish Transit, which have reclining, cloth seats, reading lights, and air conditioning. While "nicer" buses will cost more, having them will increase the likelihood that more people will use them, especially those who don't like riding the bus.	The BRT concept under Alternative 3 assumes the provision of buses appropriate to the type of premium service offered on a BRT system.
E118	TR	4	Stephanie L. Grassia slgrassia@psfinc.com Agency: Public	Another way to encourage people to use the bus/HCT is to make it so efficient compared to automobiles that they have no other choice. If HCT is to be efficient, it must be completely separated from automobile traffic; otherwise, it does not reduce travel time if the mode of transportation has to wait in the traffic jam with all the single-occupant vehicles. New York City sets a great example for mass transit. For such an enormous metropolis, people are able to move about with relative ease and minimal expense. Although Seattle is much smaller, it is far more difficult to traverse because we don't have a well-developed public transit system. HCT is the only real answer to the problem.	The Preferred Alternative includes a substantial increase in transit service as part of bus rapid transit.

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E118	TR	5	Stephanie L. Grassia slgrassia@psfinc.com Agency: Public	The I-405 transit improvements are only a small component of a much larger transit solution. Our community must provide an integrated transit system linking I-405 with the I-5 corridor, downtown Seattle, and other communities from Everett to Tacoma. Transit planners must look at long-term solutions on a regional basis, bearing in mind the enormous cost of a region-wide system. Therefore, whatever alternative is implemented, it should be in keeping with promoting regional, and not just local, transit. Alternative 1 is a first step toward accomplishing this objective by allowing fast and easy connections between major regional hubs.	The Preferred Alternatives includes a 20-30 year solution to roadway and transit, including a regional bus rapid transit system. Options for other transit solutions are not precluded by this recommendation.
E118	TR	6	Stephanie L. Grassia slgrassia@psfinc.com Agency: Public	In closing, it is a fallacy to assume that adding new roads or traffic lanes will eliminate traffic congestion. This assertion may be true in the short run, but as any urban planner knows, highways only encourage more development along the transit corridor, generating increased traffic, and making the problem worse than it was before. We need to think longer term than just the next 20 years. In 100 or 150 years, Seattle could be another New York City on the west coast, with population densities that cannot be supported by automobiles. We must move toward another alternative, and for the reasons above, Alternative 1 is our best choice.	The DEIS looks ahead to 2030. Please refer to the response to comment E66.SOL-1 for further discussion of induced travel.
E119	ALT	1	Jeff Christensen 2204 108th Ave NE Bellevue, WA 98004 Jeff@ArtSource.com Agency: Public	I write to voice my support for Alternative 3 or what is referred to as the Preliminary Preferred Alternative. Let's get on with it!!!	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E120	ALT	1	Wade Rosendahl wade.rosendahl@honeywell.com Agency: Public	I would like to voice my support for Alternative 3 or Alternative 4 of the WSDOT's I-405 Corridor Program. I think any improvements to I-405, should include direct HOV ramps, express lanes and similar improvements to SR 167.	The Preferred Alternative and Alternative 3 - Mixed Mode Emphasis, do not include express lanes on I-405 or on SR 167. Chapter 2 of the I-405 Corridor Program Draft EIS provides a description of this and the other alternatives.
E121	ALT	1	Mikhail Ekshtut Renton sgteks@tranplaneng.com Agency: Public	Are we ever going to do something to relieve the congestion on I405. We need more capacity on I405 plain and simple! It is obvious that we need to improve the interchanges at SR 167 and add travel lanes between Renton and Bellevue. The proposed Alternative #3 appears to be the best alternative for reducing congestion, and neighborhood impact from regional commuters, while still promoting and increasing transit service.	Please see response to comment L12.ALT-1.

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E122	SOL	1	Stephen Gerritson 11016 NE 164th Place Bothell, Washington 98011 sgerritson@earthlink.net Agency: Public	As a rsident of Bothell and a daily user of I-405, I am frustrated by the growing traffic problems and the time it takes to get to work. Even though I am anxious for a solution, I don't believe that what has been proposed as the preferred alternative will provide any significant relief. WSDOT's Alternative 3 for I-405 has four fatal flaws.1) It won't work. Independent studies and our experience show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic, especially in this economy. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl. I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides. A balanced program offering commuters real options is the only sensible approach.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment E66.SOL-1.
E123	ALT	1	William McSherry, Jr. 10660 NE 29th Street, #96 Bellevue, WA 98004 bkmcsherry@earthlink.net Agency: Public	I am writing in support of Alternative 3, the preliminary preferred alternative. The DOT has conducted a thorough, some might say exhaustive, examination of all possible alternatives and has preliminarily concluded that Alternative 3 will be the best option. Additionally, independent analysis by some of our region's best transportation consultants has shown that Alternative 3 has the lowest cost per passenger trip of any alternative on the table. Alternative 3 will also meet transportation demands along the I 405 corridor for the next 20 years. As budgets get tighter at all levels of government, it only makes sense to select programs that get the most use out of limited tax dollars. Alternative 3 is the only sensible choice. Thank you for the opportunity to comment.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E124	TR	1	Jennifer McWethy jennifer@mcwethy.com Agency: Public	I found the move on 405 site unclear. Under prop 3, would two lanes be added along the entire corridor between N I-5 connect and S I-5 connect?	The Preferred Alternative and Alternative 3 include addition of up to two lanes in each direction for the entire length of I-405.

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E124	TR	2	Jennifer McWethy jennifer@mcwethy.com Agency: Public	Also, I do not believe in HOV lanes, let alone increasing the number of occupants required to 3. They do not seem effective and only induce movement of traffic between lanes, causing more slow downs. If DOT ever stopped and listened to driver grips, it would almost unanimously be about idiots driving slow in the left most non-HOV lane. HOW ABOUT 'SLOW VEHICLES STAY RIGHT' TV DRIVER COURTESY ADS??? What's worse, with the HOV lane on the left, you now have idiots with two people in the car driving slow in the middle lane, blocking traffic for miles. They just don't seem to understand or care that they could move either way and make so many people less frustrated	HOV traffic constitutes 20-30 percent of all peak period person demand along I-405 and will continue to be a major travel mode in the future. You are correct in observing that slower traffic should be in the right lane.
E124	TR	3	Jennifer McWethy jennifer@mcwethy.com Agency: Public	Prop 3 seems to address 167 bottleneck, but how about N-bound 405 where it STOPS at Kirkland? How about an exit lane from 85th through all the Totem Lake exits?	We are aware of this situation. Each of the alternatives includes improvements in this section of I-405 comparable to the suggestion you pose.
E125	SOL	1	Peter and Naomi Rimbos 19711 241st Ave SE Maple Valley, WA 98038-8926 primbos@home.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws: (1) It won't work--Independent studies show that reliance on new lanes creates more traffic; (2) We cannot afford the $8 billion price tag--such massive tax increases are not realistic; (3) Alternative 3 will harm neighborhoods by increasing traffic on local streets; and (4) It will increase noise, air and water pollution, and worsen sprawl. We urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on: (1) strategic road improvements; (2) an aggressive trip-reduction program; and (3) significantly more buses, vanpools, and park & rides. Specifically, Alternative 5 will: Target I-405 Improvements to the Worst Congestion Spots. Prioritizing the freeway's worst congestion, add one lane in each direction to I 405, from its intersection with I-5 in the south to I 90, and on SR 167, south of I-405 to the county line - these additional lanes should be studied further, before the FEIS is initiated, to determine whether they should be developed as general purpose lanes or as managed and/or priced lanes combined with the existing high occupancy vehicle (HOV) lanes. Focus on I-405 Bottlenecks. Implement various interchange improvements on I-405 south and the addition of several sections of auxiliary lanes and truck climbing lanes throughout I 405.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. An implementation plan has been prepared that gives priority to the identified bottleneck locations, such as those identified in the comment. The Preferred Alternative includes provisions for possible future implementation of a managed lane system, subject to further evaluation.

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				Employ Transit on the BNSF Alignment. The BNSF (Dinner Train) alignment and tracks should be purchased and the options of either a diesel rail or a busway line using the alignment should be studied further before the FEIS is initiated - either line would be supported by an intensive arterial-based Bus Rapid Transit System (BRT) that should be planned in detail before starting the FEIS, and by Sound Transit's high capacity transit line across Lake Washington into Seattle.	The Executive Committee sent a letter to the BNSF and local agencies supporting the preservation of the railroad alignment for future transportation use. However, the purchase of the BNSF is not included as part of the Preferred Alternative. Many local agencies in the study area have policies related to local street connectivity. The Preferred Alternative includes considerable emphasis on freeway and arterial street improvements as the focus for accommodating regional travel. Certain key arterial 'missing links' are included on this list. The committees did not discuss nor evaluate a specific local street connectivity program as you describe.
				Improve Local Street Connectivity. Increasing street and pedestrian connectivity in activity centers (across I-405) and residential areas has been proven to reduce congestion on arterial streets and freeway segments and to increase transit use, therefore, include a connectivity program of $90 million to develop standards and a project list (to ensure no cut-through traffic through established neighborhoods) and to construct the identified connectivity projects.	
				Recognize Freight Movement is a High Priority. Include all identified freight improvements in Alternatives 2 and 3, except for the remote area parking for staging of freight.	These improvements are included in the Preferred Alternative.
				Employ HOV, Bicycle and Pedestrian Projects. Include all projects in Alternatives 2 and 3 that are primarily HOV, bike, pedestrian and/or transit oriented are included, except that only 25% of the program to add the highest-priority HOV ramps from I-405 should be included.	
				Implement Transit-Oriented Development Program. Implement a $20.0 million program for the implementation of a transit oriented development (TOD) revolving fund to support activities such as parcel consolidation and financing for properties adjacent to established transit facilities.	
				Implement 20-Year Trip-Reduction Program. Implement an innovative trip-reduction program based upon $20 million per year, targeting the reduction of both work and non-work trips.	

Code Number			Name	Comment	Response
				Implement Corridor Refinement Studies. Develop and modify the above recommendations through possibly three corridor refinement studies, prior to initiating the FEIS, based upon more local involvement and more-appropriate evaluation goals, criteria and measures. Please consider Sensible Solutions for 405 Alternative 5, which includes the following important aspects: Smart Growth; Trip Reduction; Strategic Investments in Choke Points; Strategic Transit Improvements; Pricing Parking and General-Purpose Capacity; and Neighborhood Protection. Thank you for considering and taking our comments into account in your evaluation of I-405 alternatives.	Various refinements are underway on many elements of the Preferred Alternative, including those referenced in the comment.
E126	SOL	1	Marcia Glover 14516 SE 47th Place Bellevue, Washington 98006 marciagl@microsoft.com Agency: Public	I strongly urge you to consider by thoroughly analyzing Alternative 5 because its solutions are what we should be doing now and for the future of the Seattle Metro area. What the future should look like is: More jobs and housing located in major centers with great transit service Give workers and employers more options to reduce the number of trips per day. Smarter highways with smarter handling of choke points, ramp metering and HOV priority. Put the money in buses not highways. What happens with new highways? They create more traffic not less. Neighborhoods should be free from the increase traffic that cut though traffic creates. Less noise, air and water pollution and reduction in sprawl. ThatB s what Alternative 5 is going to give us. WSDOTB s Alternative 3 for 1_405 will only make things worse not better. ItB s time to stop relying on just building more highway and look at the problem from a bigger perspective. I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides. ItB s time to really make a difference and change our old bad habits about dealing with traffic problems. More highway is not going to make anything better. It will only make things worse.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. Like the Sensible Solutions proposal, the Preferred Alternative provides for an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E127	SOL	1	Marvelyn Criner brownie@tranplaneng.com Agency: Public	It is my understanding that the opponents of doing something about I-405 are responding with comments in numbers. I want to be on the record as one who believes we cannot continue to function with the "do nothing" alternative. We must improve I-405!	Thank you for your comment.

Code Number			Name	Comment	Response
E128	ALT	1	Ned Wolf 11112 E. Riverside Dr., Bothell 98011 nedwolf@rcia.com Agency: Public	WADOT's preferred alternative is seriously flawed. How many studies are required before we accept that added highway capacity overflows months after it is completed? This has been demonstrated time and time again. Imagine l8 years of construction delays. Meanwhile, the cost is the equivalent of asking each household within the 405 community to pony up $50,000 - and will cost about $1000 per square foot! For more noise, congestion and pollution? A very sorry exchange indeed.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS.
E128	TR	1	Ned Wolf 11112 E. Riverside Dr., Bothell 98011 nedwolf@rcia.com Agency: Public	The problem of our traffic congestion isn't a new one. Cities around the world with population pressures like ours always develop multiple transportation systems. Our community, especially with its geographic constraints, becomes unacceptably vulnerable when we design a single-system transportation solution. We need to diversify our commuting options, otherwise we become dangerously susceptible to construction delays, design flaws, and interruptions in traffic - not to mention terrorism.	The Preferred Alternative is a multimodal solution to transportation in the I-405 corridor. It includes substantial investment in roads, transit, and other modes of travel.
E128	SOL	1	Ned Wolf 11112 E. Riverside Dr., Bothell 98011 nedwolf@rcia.com Agency: Public	There exists a railroad right-of-way along the eastside which could certainly be developed cheaper and quicker than the state's preferred plan of 4 new lanes of traffic. Such an option, while requiring a period of education to be effectively used, would vastly reduce future transportation's impact on our environment. Such an option would allow us more ways to intelligently manage future growth. Additionally, a rail transit system would not be dumping close to one ton of toxic material into the three major watersheds along the eastside (the expected impact of the state's preferred alternative).	The use of the BNSF right-of-way was included in the high-capacity transit elements of Alternatives 1 and 2. The Preferred Alternative does not change the current use of the railroad right-of-way, since the preferred transit strategy is a bus rapid transit system operating in improved access HOV lanes. The Committee sent a letter to BNSF and appropriate agencies recommending that the existing railroad corridor be preserved for future transportation uses. The impacts and potential benefits of using the Burlington Northern Santa Fe (BNSF) Railroad alignment adjacent to I-405 for moving people has been included in Alternatives 1 and 2. This is an active freight line, and BNSF has stated their intent to continue operations into the foreseeable future. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS.

Code Number			Name	Comment	Response
E128	SOL	2	Ned Wolf 11112 E. Riverside Dr., Bothell 98011 nedwolf@rcia.com Agency: Public	A coalition of local environmental groups, including the Sierra Club, has formed an organization called Sensible Solutions for 405. While I don't completely agree with their alternative (although heartily support a redesign of the I405-SR.l67 intersection), this organization is being very supportive of alternatives that support all facets of the community. I encourage serious revision of the state's plans for 405 expansion.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3 - Mixed Mode Emphasis. Please refer to the response to comment E66.SOL-1.
E129	ALT	1	Chris P. Baldwin Chris.Baldwin@Honeywell.com Agency: Public	As a lifelong resident of Washington State and a frustrated/irritated commuter, I want to see tangible action taken to reduce congestion on our highways. Mass transit may or may not be part of the solution and is currently paralyzed with massive cost overruns and past leadership problems. I want to see steps taken immediately to add new roads and additional lanes to Western Washington highways. Please take immediate action and implement the Preliminary Preferred Alternative or Alternative 3 . I have yet to see real value come from delaying actions or forced mass transit solutions (that don't yet exist). Feel free to continue discussing transit alternatives but please add lanes to I405 NOW. I am very tired of the constantly increasing time it takes to go anywhere and of this region's inability to make tangible traffic improvements because of a vocal minority who have successfully opposed highway expansion projects.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3.
E129	O	1	Chris P. Baldwin Chris.Baldwin@Honeywell.com Agency: Public	Thank you for your dedication to resolve OUR traffic problems and please act quickly with this project. I hope you can also move rapidly to fix other major problem areas such as I5 through Seattle - a North/South bypass, SR167 gridlock and additional lanes North from Seattle to Arlington. PLEASE fix I405 IMMEDIATELY and act quickly as possible elsewhere.	Interstate 5 through Seattle, a north/south bypass, and additional lanes north from Seattle to Arlington are outside the scope of improvements being considered as part of the I-405 Corridor Program.
E129	O	2	Chris P. Baldwin Chris.Baldwin@Honeywell.com Agency: Public	PS Please also look at adding lanes to I90 over the pass and down the east side. It's a mess every summer weekend and every holiday.	Adding lanes to I-90 over Snoqualmie Pass and on the east side of the pass are outside the scope of improvements being considered as part of the I-405 Corridor Program.
E130	ALT	1	R.C. Wallace PO Box 4184 Bellevue, WA. 98009-4184 rwallace@wallaceproperties.com Agency: Public	I strongly support Alternative Three for I 405.	Please see response to comment L12.ALT-1.

Code Number			Name	Comment	Response
E131	ALT	1	droger@ltia.lynden.com Thomas A. Farr 730 Central Ave. South Kent, WA 98032 tfarr@petrocard.com Becky Hamilton Becky_Hamilton@bc.com Ian Fernie IFernie@pacificdda.com Jerry Hawkins jhawkins@lile.net Maria C. Martin MMartin@USFWorldwide.com Aaron Reding PO Box 38 Kent, WA 98035 areding@petrocard.com Agency: Public	Please support Alternative 3 as the most cost-effective solution for reducing congestion and improving mobility on I-405.	Please see response to comment L12.ALT-1.
E132	ALT	1	James Pederson PO Box 38 Kent, WA 98035 jpederson@petrocard.com Agency: Public	Move on the 3rd alternative	Please see response to comment L12.ALT-1.

Code Number			Name	Comment	Response
E133	ALT	1	Keith Ross kross@petrocard.com Agency: Public	Please support Alternative 3 as the most cost-effective solution for reducing congestion and improving mobility on I-405. I am in the fuel industry, and know very well the frustrations of the businesses trying to operate in the grid locked traffic.	Please see response to comment L12.ALT-1.
E134	ALT	1	Rick Smith rsmith@moovers.com Agency: Public	I support alternative #3	Please see response to comment L12.ALT-1.
E135	ALT	1	Stan Vander Pol Auburn, WA stanv@peninsulatruck.com Agency: Public	Please support Alternative 3 as the most cost-effective solution for reducing congestion and improving mobility on I-405. Traffic congestion is a difficult problem. I have reviewed the four proposed alternatives and the idea of taking no action. All solutions have impacts, but I believe that alternative three gives the greatest benefit. It is not the most expensive alternative nor is it the cheapest but I feel it would provide the most benefit to the general public and to my industry (trucking).	Please see response to comment L12.ALT-1.
E136	PPA	1	Bob Nuber rjnuber@home.com Agency: Public	I support the I-405 Corridir Program's preliminary preferred alternative because it is the most cost effective of the alternatives. The public clearly receives the most results for the dollars spent. We need to get moving on this ASAP.	Please see response to comment E29.PPA-1.
E137	ALT	1	Cgistephen@aol.com Agency: Public	Please support Alternative 3 as the most cost-effective solution for reducing congestion and improving mobility on I-405. Our customers rely on our ability to move products and freight along this corridor. The current congestion increases transportation and service costs and is an undependable connector (in terms of time traveled) between counties north and south of I-405. In addition, our commercial traffic is vulnerable to threats or catastrophic damage to I-5 under the convention center. This is the only other viable north/south alternative and it is also seriously congested already. Alternative 3 on I-405 is essential to the continued flow of goods and services between north and south counties.	Please see response to comment L12.ALT-1.

Code Number			Name	Comment	Response
E138	SOL	1	JT Carriuolo 5929 149 th Ave SE Bellevue, Washington 98006 jtcarr@leadershipcriteria.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl. I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides. Being creative, resourceful and listening to the people--to find less expensive, more workable solutions--are criteria for leadership. We urge you to listen, and consider Alternative 5. Have courage. Be the leaders we know you can be.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.
E139	SOL	1	James DuVall 10520 N.E. 197th Street Bothell Washington, Washington 98011 jduvall@oz.net Agency: Public	I urge you to to implement an B INTEGRATED - PHASED IN - STATEWIDE HI-SPEED RAIL SYSTEMB Goal: To reduce the number of vehicles and allow competent vehicle use/access to city, county, state roads without traffic congestion. Benefits: In this respect we should start with Freeway overloads. Implement a high speed (100-150 mph electrical rail system tied in with our existing State, County and City transit and transportation systems. This would reduce pollution and significantly impact other negative environmental factors while achieving a more responsive solution to moving people comfortably, easily and swiftly. A system of this nature would reduce needs to expand freeways and other routes (which tend to support the concept of more motorized vehicles B on the roadB), set in motion a reduction in vehicle use, reduce vehicle accidents, travel time loss due, be adaptable for travel to/from work destinations, for shopping, etc.	Alternatives 1 and 2 include a fixed-guideway transit system, which would operate similar to that proposed in the comment. The speeds within the I-405 corridor would likely be in the 50-60 mph range, but could be tied to a higher speed rail system serving the region and beyond. This expanded system was not evaluated as part of the I-405 Corridor Program.

Code Number			Name	Comment	Response
				Implementation: Developed to insure the most heavily traveled freeways/routes are given priority as to construction/use of the neww system. First phase-initial city to initial city); and B debuggedB so that other major extensions/additions achieve optimum efficiency and cost reductions. could be achieved from the B learning curveB concept. This system would be tied into other supplementing (added and/or reinforced existing) State, County and City internal transportation and park and ride systems. These to be buttressed to accomodate the new system. There would be a strict minimum of stops (no more than one stop between the larger cities, e.g., one between Seattle and Everett. Fares to be amazingly low. I anticipate around one dollar or less for one way. The State, Counties and Cities would underwrite this system by pooling their money. Planning/coordination/Oversight: The planning and drawing together of our business community,and labor unions (and Federal Government if we can secure support/funds here) and State, County and City governments would be accomplished through a small select committee of no more than 11 members. This committee to be composed of 11 members: Financial Community - 2; Business Community - 2; Labor Unions - 3; State - 2; Counties - 1; Cities - 1 (Members to be proposed by those they represent, appointed by the Governor/confirmed by the legislature). -Implementing Agreement: This consortium of businesses, government, labor, etc., would signatories to and be bound by an agreement which would set forth such things as responsibilities for of those agreeing. E.g., providing of skilled and unskilled labor, design/construction, etc., schedules, wages/salaries for employees with appropriate cost of living adjustments, medical and other benefits such as sick leave/vacations, etc. spelled out. Gross profit set at around 8%.	

Code Number			Name	Comment	Response
				In summary: This approach should significantly reduce and continue to reduce traffic congestion, pollution, gasoline use/costs, provide significantlong term employment and incentives for business and labor. Most of all it would deliver to the public, by government through businesses, labor unions and financial institutions a critically needed beneficial service; a strong step preserving and enhancing our currently depreciating quality of system supporting our goal of full employment with appropriate pay levels and fringe benefits. This is of course a preliminary statement. and needs a few adjustsments. We have the technology, labor pools, finances and ingenuity. All we really need are the guts/courage to do it! We can buttress our park and ride, local transit systems as necessary to make this work.	
E140	ALT	1	Jfitztire@aol.com Agency: Public	Please support Alternative 3 as the most cost effective solution for reducing congestion and improving mobility on I-405.	Please see response to comment L12.ALT-1.
E141	ALT	1	Sherry Ladd 9621 Hilltop Road Bellevue, WA. 98004 sherry@ladd.com Agency: Public	I am writing in support for Alternative #3 as the preferred alternative of the Department of Transportation's I-405 Corridor Program. Please help us get out of this mess.	Please see response to comment L12.ALT-1.
E142	ALT	1	Tim Erickson Agency: Public	I have taken some time to review the Citizen's Guide to the I-405 Project and would like to pass on my support for Alternative #3. Not only will this alternative be the best fit for my customer, the trucking industry, but it is one in which I support through the use of the CVISN Program here in WSDOT. I feel this alternative is the most cost-effective solution for reducing congestion and improving mobility on I-405. I also feel this alternative optimizes the concern of all the interest groups, i.e., environmentalists, transit groups.	Please see response to comment L12.ALT-1.
E142	O	1	Tim Erickson Agency: Public	On another note, I found the internet Citizen's Guide to be excellent in form and content. It is easily read and understood. Congratulations on a well presented and concise document.	Thank you for your comment.
E143	ALT	1	Larry Hansen Larry.Hansen@oakh.com Agency: Public	Please support Alternative 3 as the most cost-effective solution for reducing congestion and improving mobility on I-405. The trucking industry and our customers are rely on the abiltiy to efficiently deliver freight along the I-405 corridor.	Please see response to comment L12.ALT-1.
E144	ALT	1	Tom Landry TomL@spanalaska.com Agency: Public	The only alternative I will support is alternative 3.	Please see response to comment L12.ALT-1.

Code Number			Name	Comment	Response
E144	SOL	1	Tom Landry TomL@spanalaska.com Agency: Public	We need to focus our attention on general traffic lanes. Far to much time an money has been spent on HOV and transit. It's obvious that people want to drive their cars and that is where the money needs to go. HOV lanes should also be opened to general traffic during non-peak traffic hours. A large amount of the use during non-peak hours comes from mothers and their children. This does not take any vehicles off the road.	The HOV lanes will continue to carry 20 to 30 percent of corridor persons during peak periods and will continue in growth during off-peak periods. General traffic capacity increases will be substantially greater than HOV capacity.
E145	ALT	1	Roger Olds Roger_Olds@bc.com Agency: Public	Please support alternative 3 as the most cost-effective solution for reducing congestion and improving mobility on i405.	Please see response to comment L12.ALT-1.
E146	ALT	1	Dale Lemmons dalemmons@interstatewood.com Agency: Public	I am an owner of Interstate Wood Products Inc. in Kelso Washington. We have used the I-5 and I-405 freeways to transport goods for the past 10 years. We have seen an increased problem with congestion through this area and have seen a need to institute congestion pricing on some routes. We strongly support Alternative 3 as the most cost-effective solution for reducing congestion and improving mobility on the I-405 and I-5 corridors. Thank you for your support of highway improvements.	Please see response to comment L12.ALT-1.
E147				There is no correspondence numbered E147. This gap in the comments sequence is the result of a coding error.	
E148	SOL	1	Warren Yee 5912 23rd Avenue South Seattle, WA 98108-2944 wye@earthlink.net Agency: Public	The two added general purpose lanes in each direction as proposed in alternative 3 should be converted into "LIMITED ACCESS EXPRESS LANES" and managed as a TOLL FACILITY. The reason, why I favor this concept, versus just adding 2 FREE General Purpose lanes in each direction, is that these lanes will move much quicker, due to lesser lane changes, less pollution, and with limited financial means and funding problems, these new lanes will pay for themselves eventually with TOLLS. I figured that most people who are going to use the this new facility will tend to be those going longer distances on I-405. This toll facility concept needs to determine if it will be strictly a "transponder card only" facility, or will a manned toll booth (at the entrances of the limited access express lanes) be also available for ccasional users. On the subject of HOT lanes, the biggest problem I see of putting the HOV lanes as part of the HOT lanes, is that the vanpools/carpools must be pregistered to use these facilities. Thus, it essentially precludes impromptu carpools, or once in a while carpools.	Thank you for your comments regarding general traffic lanes. The potential for managed lanes is included in the Preferred Alternative. The environmental effects are documented in the FEIS in Section 3.12. Such managed lanes could be designed to accomodate future tolls using technology described in the comment.

Code Number			Name	Comment	Response
				This problem needs to be looked further in the FEIS, mainly as a WSDOT future policy on HOT lanes for any similar facility that will be built in the future (IE. translake study). Hence, the limited access express lanes should be strictly for those willing to pay a toll, and for transit buses (all transit vehicles will be supplied a free transponder). The existing free GP lanes should continue to have a free HOV left lane, as they do today, to avoid the problem with preregistration and allow continued use by impromptu carpools. However, precludes preregistered vanpools should receive a discount, if they use the expresslanes. I'm not opposed to adding some "limited distance" General Purpose lanes, mainly if they are just TRUCK CLIMBING lanes, or for a very short distance to relieve local congestion. However, I'm opposed to adding FREE General Purpose lanes for the entire length of I-405.	
E149	ALT	1	David K. Toyer 1701 121st ST SE, N202 Everett, WA 98201 GovtLawGuy@aol.com Agency: Public	I support Alternative 3 (the preferred preliminary alternative). As a commuter that must use this corridor everyday to make multiple trips between Bellevue and Snohomish County, it is important that we sensibly expand 405's capacity. Starting in March of this year I added a section to my time sheets that is for recording the time I spend on the road everyday going up and down the I-405 and I-5 corridors. In sum, I spend an average of 16% of my time on the road and this DOES NOT include my morning and evening commutes.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E150	SOL	1	Dave Krajczynski davek@highridge.com Agency: Public	I live and travel daily on the Eastside. My work area Everett to Tacoma and in an average week I travel along 405 twelve to fifteen times. These are two way trips both up and back or down and back however you would like to look at it. I fully support any efforts to increase mobility and reduce problem bottlenecks along this major economic corridor. Furthermore the "Move on 405" initiative has my backing and staunch support. Thank you for taking the time to read and acknowledge my position on this very important topic.	Thank you for your comment.
E151	ALT	1	Jeff Baker jeffb@ticonteam.com Agency: Public	I support prelim preferred alt. #3.	Please see response to comment L12.ALT-1.
E152	SOL	1	John Armitage johna@dunnlum.com Agency: Public	I work for a company who does business in Renton . Since we have staggered shifts car pooling is not a viable option. I can see right out my back door the gridlock on 405. I believe the best solution is to go ahead with the expansion of 405 in the Renton area around I - 167.	Thank you for your comment.

Code Number			Name	Comment	Response
E153	ALT	1	Mark A. Weed markw@fishprop.com Agency: Public	I wish to express my support for Alternative 3 and the two year collaborative effort that produced this Preliminary Preferred Alternative. After studying the facts I believe Alternative 3 can reduce congestion and improve mobility for our region.	Please see response to comment L12.ALT-1.
E154	ALT	1	John Cannon 2800 Northup Way #100 Bellevue, Wa. 98004 jcannon@lewisarchitects.com Agency: Public	I support alternate 3. And I'm sorry, I don't have any extra money to donate. I'm too busy trying to run a responsible business, being accountable, etc. I know you folks can't relate to that, but that's the reason.	Please see response to comment L12.ALT-1.
E155	ALT	1	Mark Cairns MarkC@superfloors.com Agency: Public	I support the Preliminary Preferred Alternative (Alt #3)	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E156	ALT	1	Al Thomas, CLC 222 Second Ave Ext. South Seattle, WA 98104 athomas@seattlelighting.com Agency: Public	The constant traffic gridlock on Interstate 405 does not adequately meet our transportation needs on the eastside. I believe Alternative 3, known as the Preliminary Preferred Alternative, is the most cost-effective solution that will accomplish the goals of reducing traffic congestion and improving mobility on the I-405 corridor.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E157	ALT	1	Russell Hokanson Snohomish County-Camano russell@sccar.com Agency: Public	I am in favor of a cost-effective solution for improving traffic flow and capacity on I-405. That is why I favor Preferred Alternative #3 now under consideration. As a commuter, an employee and a resident who travels on I-405 every day, I believe that we must improve this incredibly important transportation corridor in an immediate and cost-effective manner. Alternative #3 does that. Our economic well-being and productivity should not be put at further risk by delaying a decision to improve I-405. Alternative #3 makes sense, so let's get on with it. It is unconscionable to me that our efforts to make these absolutely essential improvements could be delayed further by groups that adopt a deliberate strategy to stall the decision. We have a sensible alternative before us. Let's move on it!	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
E158	ALT	1	Jim Grover jag@painterman.com Agency: Public	This is what I support and want as a small businessman and citizen and taxpayer. Preliminary Preferred Alternative (Alternative 3) that contains a mix of roadway, transit and non-motorized improvements to address congestion on I-405. Preliminary Preferred Alternative Solutions: Adds two new general traffic lanes in each direction to I-405 Develops an expanded express and local bus system focused on the HOV lanes along I-405 and other roadways Fixes bottlenecks such as the SR 167/I-405 interchange Widens a portion of SR 167 from Renton to Kent	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E159	SOL	1	Patricia Ledbetter patricia@cci.net Agency: Public	Move on 405. Fix our roads & congestion. Go forward	Thank you for your comment.
E160	ALT	1	Jeff Taylor 700 Fifth Avenue, Suite 6175 Seattle, WA 98104 jtaylor@metzlerna.com Agency: Public	The traffic on I405 has become a unbearable option, and has and will continue to be a burden on attracting any kind of industry to the eastside. The affordable housing tends to be south, north or east, and the commute to Bellevue and the surrounding areas of the eastside is unbearable. Industry just won't put up with it. One doesn't have to look any further than the Boeing example. Please move on Alternative 3 know as the Preliminary Preferred Alternative.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E161	ALT	1	Dwight K. Martin DwightKM@aol.com Agency: Public	Enough of the studies, let's go with option #3 and get rolling again.	Please see response to comment L12.ALT-1.
E162	ALT	1	Kim Bentz kbentz@northstream.com Agency: Public	This email is to support the preliminary prefered alternatice #3 for the I405 corridor. This is a much needed improvement for businesses.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.

Code Number			Name	Comment	Response
E163	ALT	1	Ken Paauw 46627 SE Mt. Si Rd. North Bend, Wa. 98045 Kenneth_Paauw@KeyBank.com Agency: Public	The purpose of this e-mail is to lend my support to the expansion of I-405, and specifically the Preliminary Preferred Alternative (Alt. #3). Having unencumbered transportation corridors is nothing less than a prerequisite for economic growth of any significance in today's society. Without the ability of a region to efficiently move goods restricts the ability of commerce to take place. In the highly efficient capitalist society we live in, the companies that dive economic growth will go to where they can transact business efficiently. We need to act NOW to keep business in the Puget Sound area. Second, besides the improvement of I-405 being an absolute necessity for economic growth, the jobs that will be created by this project will provide a helpful boost to the local economy in this time of recession. Please do not be sedueced by the flawed arguments of 1000 Friend of Washington.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E164	ALT	1	Larry Chimenti LChimenti@mba-ks.com Agency: Public	Please, please, please get on with alternative three. I'm tired of being stuck in traffic	Please see response to comment L12.ALT-1.
E165	ALT	1	Clay Loomis CLOOMIS@TriadAssoc.com Agency: Public	I have lived in this area for over ten years and seen the traffic grow steadily worse. I believe this has been because of poor planning and slow construction. I am a Civil Engineer register in the state of Washington. I have reviewed the alternatives and I am in strong support of the Preliminary Preferred Alternative (Alternative 3). I would also recommend that the state DOT look at the fast means of construction to bring this alternative online. I along with many others feel that the economic future of this area is tied to the states ability to solve our traffic problems. Mass transit is not the solution. Please support the Preliminary Preferred Alternative (Alternative 3) to solve a portion of this areas transportation problems.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E166	ALT	1	Doug Bratz PO Box 329 Woodinville, WA 98072 dougb@uni-land.com Agency: Public	I wanted to express my views and the views of my company on the I-405 corridor improvements under your consideration. I am familiar with the alternatives you are looking at and have a strong preference towards the Preliminary Preferred Alternative (Alternative 3). Our region needs this work to proceed.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.

Code Number			Name	Comment	Response
E167	ALT	1	Orion Ahrensfeld Oxa@deainc.com Agency: Public	I believe that it is imperative that something be done about the current situation and severe congestion on I-405, it's absolutely ridiculous, it can take me anywhere from 30 minutes to an hour to get from 8th street (in Bellevue) to Totem Lake (124th). I believe that any drivers who are willing to make the change to mass transit have already done so, and a concerted effor to expand that system instead of expanding the highway would not be enough to alleviate the current traffic congestion. It is my firm belief that the only alternative that is feasible at this time is the expansion of the I-405 corridor along with attempting to strengthen the mass transit/bus system. Because of this I fully support the Preferred Alternative (Alternative 3) approved by the WSDOT.	WSDOT has not approved or chosen any alternative; all alternatives are under consideration. It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E168	O	1	Scott Hall scott@burnstead.com Agency: Public	Please act now and move forward on the proposed plan for improving the corridor.	Thank you for your comment.
E169	ALT	1	Jon W. Nelson jnelson@pcecivil.com 4030 Lake Washington Blvd N.E. Suite 200 Kirkland, Washington 98033 Agency: Public	Subject: alternative #3 Gentlemen, please take my vote for this alternative. We have studied this enough. Now let's get on to fixing our transportation problems.	Please see response to comment L12.ALT-1.
E170	ALT	1	Satterlee, Mike mike.satterlee@quadrantcorp.com Agency: Public	How anyone could consider anything but the 3rd alternative is beyond me. We must be able to move people and frieght through our community. The only way to accomplish this is by adding capacity to I-405. The 3rd alternative is the one that we must implement!	Please see response to comment L12.ALT-1.
E171	ALT	1	Tom Ehrlichman tehrlichman@tjelaw.com Agency: Public	As part of the public comment period for the I-405 corridor proposal, I would urge you to adopt Alternative No. 3. Until man invents an alternative to the automobile, we will need more travel lanes. Rapid transit will never handle the trip per day load necessary to supplant a new freeway lane. Failure to plan and fund for new improvements today will result in a crisis ten years from now. Lets not let that happen.	Please see response to comment L12.ALT-1.
E172	ALT	1	Jeff Hanson JeffH@seamark.com Agency: Public	I strongly believe that Alternative #3 provides the best proposed solution for our current transportation debacle. It is clearly the only cost effective approach proposed to date. I depend on I-405 and something must be done soon to improve our situation.	Please see response to comment L12.ALT-1.

Code Number			Name	Comment	Response
E173	ALT	1	Ed Olson pacgar@richpoor.net Agency: Public	I am emailing IN SUPPORT of of the Preliminary Preferred Alternative (Alt #3) for the I 405. I feel it is time we create more options which include new and expanded roads and not just studies and good intentions about more so called rapid transit.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E174	O	1	Mike Bushmaker mikeb@highridge.com Agency: Public	PLEASE MOVE FORWARD WITH ANY PLANS TO IMPROVE TRANSPORTATION IS THIS REGION! MY BUSINESS PARTNER AND I ARE LANDSPAPE CONTRACTORS AND WE SPEND SO MUCH MONEY PAYING PEOPLE WHO ARE STUCK IN TRAFFIC IT IS RIDICULOUS! THESE WAGES ARE NORMALLY AT AN OVERTIME RATE AND SO THE COSTS ARE UNBUDGETED. YOU CANNOT MOVE FAST ENOUGH!	Thank you for your comment.
E175	ALT	1	Ron Leibsohn 11100 N.E. 8th Street, Suite 800 Bellevue, Wa. 98004 rleibsohn@leibsohn.com Agency: Public	I want to express my full support for the I-405 Preliminary Preferred Alternate (Alt. #3). It is critical to the current and future health of the region to start this work ASAP. Those of us that use the highway for business use can no longer afford the wasted time stuck in traffic. Our clients are considering moving their expansion plans to other states because of this problem. As important is the long term effect this is having on families. When working fathers or mothers have to spend two hours a day commuting it takes a terrible toll on family life. You only have to look to other areas to see the long term negative results. We are already seeing this happen and we must act now to stop the problem.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E176	O	1	Sarah A. Starkovich 2155 112th Ave NE Bellevue, WA 98004 SStarkovich@mba-ks.com Agency: Public	I currently live in Renton, work in Bellevue at the Master Builders Assosciation of King and Snohomish Counties, and go to school at ITT in south Seattle. When I heard that construction might stop on I-405 and 167, I was outraged. It takes me an hour, (on a good day) to get to work, and that is with the carpool lane the majority of the drive. It takes me 25 minutes to get to school, which doesn't seem that bad until you realize that it is under ten miles from point A to point B. And it takes me almost 40 minutes every Tuesday and Thursday to get from south seattle to Bellevue via I-90.	The Preferred Alternative contains a bus rapid transit system operating in improved access HOV lanes, as well as other substantial improvements including park-and-ride lots, transit stations, bicycle and pedestrian facilities, and truck freight enhancements. The Preferred Alternative also includes up to two additional lanes in each direction on I-405 to help reduce congestion and improve mobility across all transportation modes. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
				If there is not going to improvement on the surrounding areas of where I live, then I will most definitely move to somewhere that traffic is a little better. Unfortunately... the traffic sucks everywhere. (Which helps narrow down the choices to live in Washington.) Who would stop this kind of good thing for everyone in the area when it so obviously needed. I personally hope that the construction continues and will be severely disappointed if it does not. Major traffic delays in the greater Seattle area should be a high priority for the whole area - not only for the building industry, which needs the better transportation for their/our industry, but also for the people that get caught in these delays on a daily basis.	
E177	ALT	1	John Day johndayhomes@msn.com Agency: Public	Alternative 3, known as the Preliminary Preferred Alternative, was identified as the most cost-effective solution that will accomplish the goals of reducing traffic congestion and improving mobility on the I-405 corridor. The process used to identify this alternative was substantive and complete and the preferred alternative should be given substantial wieght and processed at the earliest possible date.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E178	ALT	1	John C. Cochenour 10807 NE 39th Place Bellevue, WA 98004 john@lexingtonfinehomes.com Agency: Public	I am writing regarding the I-405 Corridor Program. I support Proposal 3. We need more general lanes of traffic and need to improve the 167 interchange.	Please see response to comment L12.ALT-1.
E178	TR	1	John C. Cochenour 10807 NE 39th Place Bellevue, WA 98004 john@lexingtonfinehomes.com Agency: Public	I believe our continued attempt to "force" people into express lanes is misguided. The majority of use of I-405 express lanes is by people who are riding together by choice and not by the desire to use the express lanes (families, friends....). We have passed the point of gridlock in this experiment and are no closer to changing public opinion.	General traffic capacity increases will be substantially greater than HOV capacity in the Preferred Alternative.
E179	ALT	1	Mark D'Amato mdamato@dci-engineers.com Agency: Public	Please Please do not be swayed by the rhetoric against this transportation initiative. I completely support the Preliminary Preferred Alternative (Alt. #3) for I-405.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.

Code Number			Name	Comment	Response
E180	ALT	1	John Graves 12618 75th Place SE Newcastle, WA 98056 JohnG@LozierHomes .com Agency: Public	I live in the city of Newcastle and have been following the progress of the work of the DOT in planning I-405. I have reviewed the alternatives and am happy to see that the Preferred Alternative #3 has risen to the top. I would like to go on record as supporting this alternative because: We don't have a transportation problem...we have a congestion problem. Solve the Congestion Problem! I-405 is a key link between areas south and north in the Puget Sound area. It is one of two (I-5 being the other) freeways that allows for movement of freight, services and people in a north/south direction. The costs associated with expanding I-5 are much higher than expanding I-405. If we are going to compete with other regions for high quality employees and businesses we need to solve our congestion problem. Moving products, services, as well as people, should be the primary objective of any transportation system. Capacity is the issue.....we need to build more roadway capacity. I know its not the politically correct position but it is the logically correct position and one supported by all of the statistics. If I spend less time on congested roads, I can spend more time with my family If I spend less time on congested roads, I use less gasoline If I spend less time on congested roads, I spend more hours working for my company. We don't have a transportation problem...we have a congestion problem. We wont solve the the Congestion Problem by putting more buses on already overloaded roads! We need to build more capacity in order to move goods and services.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
E181	ALT	1	Bill Tucker twb1@qwest.net Agency: Public	I use I-405 at least twice per week calling on my clients on the East side. The drive is one of the most dreaded but necessary things I must do to get my business handled. There have been times when it took three hours to return from Issaquah to Tacoma. The main slowdown was at the Renton "S" curves and then again at the I-167 interchange. I want to support the Alternative #3 because I can't see that transit alone can do much if anything to eliviate the problem. There are just too many people whgo for one reason or another will not give up their right to drive. Many have no choice because it's part of their job. Maybe some of the other alternatives would work in a perfect world but the Seattle-Tacoma area is far from that! I believe that our economy is very dependant on the expansion of our highways, and not the expansion of mass transit, (which does have its place here.)	Thank you for your comment.
E182	PPA	1	Joe Quintana 2053 - 41st Avenue East Seattle, WA 98112 jqgroup@seanet.com Agency: Public	This letter is to support the Preliminary Preferred Alternative (Preferred Alternative) proposed for the expansion of I-405. The need for expansion of I-405 clear and compelling. The expansion of the traffic-congested I-405 corridor as proposed in the Preferred Alternative would provide significant environmental, economic and quality-of-life improvements.	Please see response to comment E29.PPA-1.
E183	ALT	1	Brian P. Shinn 625 - 5th Ave South, Seattle WA 98104 shinnb@soundtransit.org Agency: Public	I support the proposed alternative (Alt 3) developed under WSDOT's SR405 corridor program. I use transit on this corridor and support this mixed mode project. General capacity improvements and transit improvements are definitely needed.	Please see response to comment L12.ALT-1.
E184	PPA	1	Lindsey Echelbarger 22833 Bothell-Everett Hwy Suite 207 Bothell, Wa 98021 lindsey@ech-cpm.com Agency: Public	Please support and move forward with the Preliminary Preferred Alternative plan to fix the I-405 mess! I use 405 everyday to and from work and know that it must be increased in capacity. If we don't move forward now, we will never be able to solve the problems. Current conditions are impeding my ability to do my business, transport goods and create jobs for people. Please move forward now.	Please see response to comment E29.PPA-1.

Code Number			Name	Comment	Response
E185	O	1	Lewis A. McMurran 2200 Alaskan Way, Suite 390 Seattle, WA 98121 LMcMurran@WSA.org Agency: WSA	WSA (formerly the Washington Software Alliance) is a trade association of over 1300 software, Internet and high-tech companies based in Seattle. We are the oldest and largest state-based high-tech trade association in the U.S. The bulk of our membership is located in Seattle, Bellevue, Kirkland and Redmond but have many members in Tacoma, Snohomish County, Kitsap County, Spokane and Bellingham. Transportation has become a serious problem for WSA members. When we polled our members at the end of 2000, traffic congestion was mentioned by a majority as a barrier to recruiting and retaining employees. Transportation problems are also hurting the ability to attract high-tech companies to the Puget Sound region. That would not be so bad if they were locating somewhere else in Washington state but that is not always the case.	Thank you for your comment.
E185	ALT	1	Lewis A. McMurran 2200 Alaskan Way, Suite 390 Seattle, WA 98121 LMcMurran@WSA.org Agency: WSA	The solution will obviously be a mix of various modalities but there is no doubt that new road capacity must be first on the list. In reviewing the 4 alternatives, we support the "preferred" alternative 3. WSA was involved in the business-labor coalition that supported a comprehensive transportation solution that eluded this year's legislature. There is just no more time to lose.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E185	SOL	1	Lewis A. McMurran 2200 Alaskan Way, Suite 390 Seattle, WA 98121 LMcMurran@WSA.org Agency: WSA	WSA also supports expanded telecommuting and telework arrangements to help alleviate traffic congestion. However, those are in addition to the need for new capacity. We urge you to move forward on Alternative 3. Thank you for your consideration.	Thank you for your comment.
E186	O	1	Eric Shimizu eshimizu@ch2m.com Agency: Public	Enough planning has occurred on this project and it's important that we build the 405 improvements to sustain our economic viabiliity and continued growth. We should move now.	Thank you for your comment.
E187	SOL	1	Paul Waidelich paulwaidelich@hotmail.com Agency: Public	I am FOR I405 EXPANSION. If people wanted alternative transportation, buses would be more popular. They aren't. Government should stop trying to legislate transportation preferences and build the roads the people want.	Thank you for your comment.

Code Number			Name	Comment	Response
E188	SOL	1	Roberta M. Webster 1065 E. Prospect St., #203 Seattle, WA 98102 bobbiw@highridge.com Agency: Public	I am totally in favor of the expansion of the I-405 Corridor that this program has been working on so diligently for the last two years. It has become increasingly difficult to navigate this eastside corridor, both on weekdays as well as weekends, and I'm afraid that it will seriously impact the way in which we conduct business...in fact, probably has already. Please join us in putting our hard earned dollars to work assisting us as we work to make Washington State a more attractive place for business, as well as individuals.	Thank you for your comment.
E189	PPA	1	Glenn Chouinard 2396 So. 280th Place Federal Way, WA 98003 chouinard.g@portseattle.org Agency: Public	Please accept this e-mail as my full support for the preferrred alternative documented within the SR405 Environmental process. In these times of economic uncertainty it is critical that WSDOT address the transportation needs of this state that have been unattended for so long. It is also my opinion that it is critical that these needs be addressed in a multi-modal manor and that we not put all of our transportation dollars in one modal basket. Now is the ideal time to invest in our infrastructure. For the economic rebound to occur WA state must have improved transportation systems that include all modes: ferries, buses, light rail, commuter rail, freight movement and improvements to our deficient highway system. Now is not the time to stop planning for the future. Now is not the time for continued cowardice by our political leaders on transportation issues. Now is the time for infrastructure investment!!	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Also, please see response to comment E29.PPA-1. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E190	O	1	Steve Plunkett Brookshirehomes@aol.com Agency: Public	Please add my support to the proposed improvements outlined in your web site! As the owner of a small home building company on the I-405 corridor I am constantly reminded of the need to improve the congestion along this highway. Not just for me but the people who buy the homes I build and the companies who supply the materials for them. We all need to see this situation improve as soon as possible. Needless to say the entire region depends on a convenient transportation system that allows everyone to get from point A to point B, with the least amount of disruption and the suggested improvements to I-405 would go a long way toward making that happen with a minimum amount of time and energy being wasted.	Chapter 2 of the I-405 Corridor Program Draft EIS provides a description of each of the alternatives, the improvements and modal elements contained in each, and their anticipated costs.

Code Number			Name	Comment	Response
E191	ALT	1	Dave Hunt DHunt@leviton.com Agency: Public	I support the Preliminary Preferred Alternative (Alt. #3) for I-405. In particular the following: Adding two new general traffic lanes each direction to I-405 Fixing bottlenecks such as the SR 167/I-405 interchange Developing an expanded express and local bus system focused on the HOV lanes along I-405 Widening a portion of SR 167 from Renton to Kent Please continue to move forward with improving I-405.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E192	ALT	1	Cameron Morehouse 10830-1 NE 34th Pl Bellevue, Wa 98004 cameronlee51@juno.com Agency: Public	I have lived in the Seattle/Bellevue area since 1969 a graduate of the UofW. As tournament Chairman of Riverbend Mens Golf Club, Kent Washington and living in Bellevue, I-405 & 520, and with relatives in Federal Way and Sea Tac, I know too well the increasing problems with traffic flow on 405/90/167. It is time to improve 405 and the plan put forth by time to move on Alt #3 is the way to go. You need to start now and perhaps in four years you may have some improvement.	Please see response to comment L12.ALT-1.
E192	SOL	1	Cameron Morehouse 10830-1 NE 34th Pl Bellevue, Wa 98004 cameronlee51@juno.com Agency: Public	Boeing has already started to move, looking elsewhere, due to traffic problems. They will get worse unless something significant can be done. Currently you have on thru lane from N Renton to South Center, southbound. One lane stops with any load for the exit at 167 and the commuter lane prevents single occupancy vehicles moving left. In addition the commuter lane is a hazard south past Maple Valley, 2 occupants speed past on the left, then cut right and brake in order to pass all the people in the thru lane and squeeze in the exit lane on the right (further slowing the thru traffic). Short term eliminate the commuter lane from Maple Valley to South Center, or move it right. Get the exiting cars off I-405 exiting to Renton or Kent 167.	The Preferred Alternative includes a major rebuilding of the SR 167 interchange. This will include direct HOV connections between the freeways, such that the HOV weaving would be eliminated. In the short term, a current project at that location will improve the southbound condition cited in the comment.
E192	ALT	2	Cameron Morehouse 10830-1 NE 34th Pl Bellevue, Wa 98004 cameronlee51@juno.com Agency: Public	There are no alternate solutions to Alt #3. You need lanes and better exit flow. The people supporting other plans must ride bicycles or expect us to and therefore have disqualified their opinion.	Please see response to comment L12.ALT-1.
E193	SOL	1	Dean and Marcie Rebhuhn Woodinville , Wa. deanr@johnlscott.com Agency: Public	I understand Sensible Solutions is mounting a last minute campaign to influence the DOT. I hope their primitive efforts are not considered. Myself and neighbors and coworkers are in favor of increased general capacity on I-405.	Thank you for your comment.

Code Number			Name	Comment	Response
E194	SOL	1	Andrew Hayden Seattle adhayden@yahoo.com Agency: Public	I'd like to make a few comments on the alternative selection for I-405. I live in Seattle and my office is located in downtown Bellevue. Because of this use of the corridor, I support the "Triple-Win/Alternative 5" plan put forward by the 1000 Friends Of Washington. This plan appears to be a more comprehensive solution for the corridor. Work in this corridor will require plenty of public money. Spending in the wrong way is worse than ignoring the congestion.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E194	TR	1	Andrew Hayden Seattle adhayden@yahoo.com Agency: Public	I agree that we do need to add general traffic capacity to the corridor, but the two new lanes added to I-405 in each direction as proposed in the preferred alternative borders on ridiculous. These lanes will soon fill up, just as every other new lane we add to our freeways, and we'll have to address this same problem again. Only this time we'll have 2 more lanes worth of gridlock fouling the air. I consider this wasteful spending. We need to first look at choke points and interchanges. Are the lanes balanced, does the design meet current standards?	Each of the alternatives includes improvements to bottleneck (choke point) locations. The project team has also taken a close look at how the added lanes would be balanced along the I-405 corridor.
E194	TR	2	Andrew Hayden Seattle adhayden@yahoo.com Agency: Public	We need to expand transit service along I-405, but we also need to look at the land use that encourages people to take advantage of existing and future transit service. Without this Transit Oriented Development, we will be wasting our investment in transit as well as automobile infrastructure.	There are funds included within the TDM program that could establish a program of seed money or a revolving fund to help support transit-oriented development.
E195	PPA	1	Judith Ann Clark 1150 Sunset Bv NE #124 Renton Wa 98056 jclark3@ch2m.com Agency: Public	Please continue the progress on I 405 toward implementing the preferred alternative.	Please see response to comment E29.PPA-1.
E195	SOL	1	Judith Ann Clark 1150 Sunset Bv NE #124 Renton Wa 98056 jclark3@ch2m.com Agency: Public	I was disappointed in the transit performance during alternative analysis. However, it may be possible to use some Sound Transit vehicles on the Dinner Train route along 405 to serve the interim traffic during the construction phase. Please consider that for construction mitigation. But don't lose momentum now as it is an economic imperative for our area. I live just off exit 5 Park Dr/Sunset.	We will investigate that possibility during project design and construction phasing.

Code Number			Name	Comment	Response
E196	ALT	1	Jeff Taylor jtaylor@valleysupply.com Agency: Public	I am a long time resident of the eastside, Redmond, and I want you to know that I am very concerned regarding the DOT and their progress on the necessary modifications to I 405. I travel 405 each day as do the delivery trucks that support the economic viability of my business. Please implement Alternative 3 immediately. If you wish to discuss this with me in person, you may contact me directly on my Cell Phone @ 206-510-8833.	Please see response to comment L12.ALT-1.
E197	ALT	1	Robert S. Betts rsbetts@pop.seanet.com Agency: Public	I attended the presentation made to the Bellevue City Council a week ago; it condensed a great deal of information and it clearly showed effort to balance various needs. As a city planner who has practiced in the Puget Sound since l977, I support the Department's Preliminary Preferred Alternative (#3). This alternative respects the real needs for added capacity, and would fix a couple of real bottlenecks. Whether or not the vehicle has freight or people in it, whether or not it is large or small, right now it all stands still, crawls sporadically, or moves fitfully; And the only other alternative that groups such as 100 Friends of Washington say work,are doing so without facing the reality that capacity on 405 is as essential as water to drink. Keep going with preferred alternative #3!	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E198	SOL	1	Daniel Cawlfield 13025 SE 164th St. Renton, Washington 98058 FluteDJC@earthlink.net Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws.1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl. I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E198	SOL	2	Daniel Cawlfield 13025 SE 164th St. Renton, Washington 98058 FluteDJC@earthlink.net Agency: Public	However, the so call "sensible solutions Alternative 5" also has flaws... It relies on the assumption that people want to live in higher density communities. However people don't really want to live in huge high-rise developments, especially in the wake of the September 11 disaster in NYC. People like to spread out. It doesn't matter if you build it vertically, or horizontally, either way more building makes for a sick and unattractive Puget Sound. I also urge you to consider ways to make home and commercial real-estate property developers, people like Harmon-Homes, Quadrant, etc., to PAY more infrastructure fees when they obtain building permits. Ultimately the answer is to stop building in Puget Sound. If you build it, they will come; and I don't know one single Puget Sound resident that wants Puget Sound to look like Los-Angeles. The most ethical way to stop building and prevent traffic problemes from getting worse is to make it unafordable. Please stop the building, including the highways!	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Fees for mitigation and building permits are determined by the local jurisdictions, and are outside the scope of this EIS. Long-term building moratoria are not consistent with the adopted statement of purpose for the I-405 Corridor Program, which includes accommodation of planned regional growth. Similarly, stopping building in the Puget Sound region would not be consistent with the corridor purpose to support a vigorous state and regional economy by responding to existing and future travel needs. Also, please refer to the response to comment E66.SOL-1.
E199	ALT	1	Marvin H. Scott 6504 106th ave ne Kirkland, wa 98033 marvs@ticonteam.com Agency: Public	I support the Preliminary Preferred Alternative (Alt. #3).	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E200				There is no correspondence numbered E200. This gap in the comments sequence is the result of a coding error.	
E201	ALT	1	Patricia Takizawa patti@connerhomes.com Agency: Public	Subject: I support the Preliminary Preferred Alternative (Alt. #3). These improvements are desperately needed.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E202	SOL	1	Mike Nykreim 101 10th. Avenue Kirkland, WA. 98033 Mike@kirklnadbuildersgroup.com Agency: Public	Our business needs more lanes of General Purpose uses on 405 ASAP. Ignore the claims of the handful of extremist from the 1000 "friends" of Washington. They are unemployable environmental activist that work at minimum wage lobbyist jobs to fill Sierra Club's extremist agenda. So, please work on behalf of the 99.99% of the population needs roads to grow our economy.	Thank you for your comment.
E203	SOL	1	Carolee Danz CaroleeD@SterlingRealty.com Agency: Public	I add my support to the preferred alternative as described. Please support this much needed expansion of the capacity of I405	Thank you for your comment.

Code Number			Name	Comment	Response
E204	O	1	Rick Heide 28119 - 120th St SE Monroe, WA 98272 rheide@characterlink.net Agency: Public	It's time the radical fringe with nothing better to do than mobilize to defeat good sensible solutions is identified for what it is. A minority. If you look at the many people who have to commute through this corridor to work, and the wasted personal time they sit in their cars, and all the better things that could be done for our area with the time these people could spend with their families and communities. It should be a crime to constantly delay and subvert progress in getting these people home to their families. I strongly support getting something built ASAP.	Thank you for your comment.
E205	ALT	1	Paul Duffy 12944 NE 136th Pl Kirkland, WA 98034 PaulD@connerhomes.com Agency: Public	I'd like to let you know that I'm in support of the Preliminary Preferred Alternative #3. We need to be making progress on 405 and this alternative is a reasonable approach to solving the problems.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E206	SOL	1	Dave Vetter davev@highridge.com Agency: Public	Expand the whole length of I-405 with 2 new lanes going each direction and expand hwy 167 all the way to I-5 in Tacoma. I don't care how much it costs. I don't care if to get it approved we have to make the whole thing look like I-90 on Mercer Island. Lets do it now. I have been living in King County for the last 20 years. What is happening to traffic is a nightmare. I do not ride the bus or any trains, I drive a car both to and from work and during work. My wife and I live in Kent and we work for different companies out of Issaquah so we do use the carpool lanes of I-405 on our way to and from work. However traffic is so bad that even the carpool lane is always stop and go. I don't want the DOT to tell me to find alternate means of getting around. I use the carpool lane when I can and when I go to the Mariner's games I try and use the buses. But 90% of my travel is on my own in routes that a bus cannot make throughout King County. A light rail system is the biggest joke to everyone I talk to.	Improvements to SR 167 beyond the City of Kent is outside the scope of the I-405 Corridor Program.

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				There are natural landmarks like Puget Sound, a couple really deep lakes and mountains all over this county. Everyone is forced to drive on the freeways because its the only way around. SO MAKE THEM WIDER, AND BUILD THEM IN SUCH A WAY THAT IN THE FUTURE WE CAN MAKE THEM WIDER AGAIN. Worst case scenario, ISSAQUAH. I work there and there is congestion all over that little city. They have only two ways across the freeway and the roads around town were designed with the idea that if you don't build new roads people won't move there. WRONG. Now everyone lives in Issaquah and there is gridlock at 7PM on a Sunday. Best case scenario, KING COUNTY AROUND KENT. This is an area that has a lot of five lane wide roads all over and is constantly putting in new ones. You can drive anywhere in around Kent and never hit traffic that is slow enough to cause you to miss a traffic light. Unless your on the freeways around Kent. There are no places to put in a new freeway so make the ones we have bigger, and straighter if possible. I would love to go on and on. This conversation gives me something to whine about to friends and family around the country. Lets make the roads bigger, get more buses. Stop building trains or rail lines for those invisible people who like to go on a trip by packing up at home and driving from there house on the Eastside to Seattle to catch the light rail line that stops a mile from the airport. Who is going to walk a mile with their luggage in Seattle weather? I'm sorry I rambled but I what more lanes so bad.	
E207	SOL	1	Jon Tellefson j.tellefson@att.net Agency: Public	Let me voice my whole hearted support for the I-405 expansion program. Without effective transportation our region will lose it's luster to companies inside and outside the area will move away or stay away (ie Boeing). Without businesses we will lose jobs, property values and the progressive lifestyle that we all have come to enjoy in rainy Seattle. Expand I-405 or die economically-it's that simple.	Thank you for your comment.
E208	ALT	1	Leah Schedin LeahS@connerhomes.com Agency: Public	I would like to go on record saying that I support Preliminary Preferred Alternative (Alt. #3) for I-405 Corridor changes. Enhancements to I-405 are needed to keep vital growth active in the greater area. Efforts to stall or stop future highway enhancements are destined to limit future job growth and will strongly skew the cost of affordable housing in close in eastside locations.	Please see response to comment L12.ALT-1.

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E209	O	1	Nick Echelbarger nlechelbarge@amherst.edu Agency: Public	It's absolutely essential that the I-405 corridor be fixed. With a slowing economy, a disgruntled Boeing and numerous business leaders ready to set up shop elsewhere, we can't wait to fix this problem. MORE LANES! PLEASE PROCEED WITH THE PLANNED EXPANSION! Do not GAMBLE our economic future on unproven methods and unwritten plans. FIX THE PROBLEM, we've had time for discussion, an plan's been written, money's been spent, NOW EXECUTE THE PLAN WE PAID FOR!	The Preferred Alternative would provide up to two additional lanes in each direction on I-405 to help reduce congestion and improve mobility across all transportation modes, as well as a bus rapid transit system operating in improved access HOV lanes, expanded park-and-ride lots, transit stations, bicycle and pedestrian facilities, and truck freight enhancements. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E210	SOL	1	JohnW Whitney@connerhomes.com Agency: Public	Pave it, put more lanes in and get traffic moving!!!	Thank you for your comment.
E211	O	1	Robert L. Patrick 1130 - 140th Ave. NE, Suite 200 Bellevue, WA 98005 rlp@landmark-inc.com Agency: Public	As a business person with offices in both Bellevue and Lacey, I can personally and painfully testify to the direct adverse consequences that traffic congestion causes to the business community that must utilize I-405 on a regular basis. My 2-way business trips between offices now consumes about 1/2 day each time I must commute, a considerable increase over just the past few years. And, of course, without major improvements this time committment will only get worse. I strongly support the public and private efforts to bring these needed improvements to I-405.	Thank you for your comment.
E212	ALT	1	Gordon MacDonald 12822 307 th av se Sultan WA 98294 PNCX1@aol.com Agency: Public	I support the Preliminary Preferred Alternative (Alt. #3) for Interstate 405.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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E213	O	1	Warren W. Buck 18115 Campus Way NE Bothell, WA 98011-8246 wbuck@bothell.washington.edu Agency: Public	This is a letter of support for the I-405 Corridor Program and the Draft Environmental Impact Statement (DEIS) in reference to it. We are continually dependent on smoother traffic flows all around the state and particularly so in Western Washington. Within Western Washington traffic issues around the Eastside of Puget Sound are becoming more important as populations, business, and educational opportunities rise. The I-405 Corridor Project is a great proposal that will benefit from full support by all levels of our citizenry. As the student enrollment continues to grow at the University of Washington, Bothell along with our co-located partner, Cascadia Community College, we will use the I-405 Corridor even more than we now do. More to the point, the proposal has lots of merit and is sensitive to all parties. Through this, it looks like we can all make our transportation issues better. Thus, I support fully the proposed I-405 Corridor Program and its DEIS. By way of this email, I am copying Dr. Victoria Munoz Richart, President of Cascadia Community College.	Thank you for your comment.
E214	O	1	Karren Roberts ksroberts432@msn.com Agency: Public	I am a taxpaying citizen in east King County. I travel 405 quite frequently and do not wish to incorporate a double decker freeway here. I originally lived in California when growing up, it was beautiful then. At about age 10 everything changed and they expanded all the roads, everything grew and finally by age 20 I was ready to leave. The congestion, pollution and density of people drove me away. I have now been in Washington for 21 years and love it. I am starting to see the signs of what was California when I was 10 years of age. Please don't let it happen again here in our beautiful state. I call Washington home and do not want to leave again. Look at the alternatives for 405 and please consider them as I am sure that you do not want your home to be ruined either.	Chapter 2 of the I-405 Corridor Program Final EIS describes the Preferred Alternative and why it was advanced as well as the other alternatives that were considered, the improvements and modal elements contained in each, and their anticipated costs. Design decisions regarding elevated sections or double-decking freeway improvements will be made during future project-level environmental analysis, documentation, and review.

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E215	SOL	1	Tony & Teresa Muro tntmuro@gte.net Agency: Public	Lets have the same number of lanes on I405 from I5 Southcenter to I5 Lynnwood. The congestion starts when you start taking lanes away and making everyone merge into fewer lanes. Four lanes and a carpool lane are sufficient with improvements by other major artilleries. We need to make some overpasses and gets cars off I405 and onto the next highway instead of backing up onto I405 because they can't merge onto next highway. More lanes each way aren't going to help if they keep having to merge down. Also bus ridership is not going to increase unless we get the cost down and riding more convenient. Lets not study this for years and have nothing happen. FIRST THING THAT SHOULD BE DONE IS MAKE I405 FOUR LANES AND CARPOOL FROM I5 to I5. YOU'LL SEE A GREAT IMPROVEMENT IN TRAFFIC CONGESTION. NUMBER TWO LETS NOT TAKE 10+ YEARS.....	Thank you for your comment.
E216	ALT	1	J.Brad & Linda Smith 12121 107th Ave NE Kirkland, WA 98034 BLJMSMITH@PRODIGY.NET Agency: Public	I endorse Alternative 3 plan. We need to make our improvements to I-405 NOW! We, in the NW want to study why some lint hair was found in some marsh grass. (maybe it a sign that Beavers have belly buttons with naval hair and we shouldn't disturb the site, for the fear of maybe taking away a possible path the Beavers use?!) Good grief, please, lets get on with providing some relief with some basic common sense! We need to make improvements without overtaking and paving the whole East Side. We must start these projects very soon or we loose grant money and we will just allow our roads to get more congested. Thank you for your consideration, and for listening.	Please see response to comment L12.ALT-1.

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E217	TR	1	Eric Peterson 24009 26th Dr. SE Bothell, WA 98021 ericpe@elbk.com Agency: Public	I would like to take this opportunity to voice my opposition to the proposed new interchange on 405 at or around 240th SE in Bothell. More accurately, I am writing in opposition to the apparent proposal to dump the traffic from that interchange directly into the residential areas to the west of the freeway. We have worked long and hard with the City of Bothell to ensure that the local street plan does not encourage pass through traffic in our neighborhoods, and to make sure that freeway traffic is properly buffered before entering residential areas. The proposed interchange at 240th SE, and more specifically the apparent proposal to connect it directly to the "neighborhood arterials" at the top of Maywood/Beckstrom Hill would effectively destroy the character of the neighborhoods in that area of our City. It would also be counter to the stated policies of our City Council, and moreover directly counter to a specific council vote taken in the fall which removed the connection from 240th SE East to the freeway from the city's street plan. I urge you to remove the proposed connection to the West at or about 240th SE in Bothell.	The proposed interchange would only connect to the office park developments to the east. It has never been proposed to connect to the residential areas to the west.
E218	PPA	1	Marko M. Jukanovich Stanwood, WA 98012 Markoj7@aol.com Agency: Public	I hereby support the Preliminary Preferred Alternative to decrease congestion and increase mobility as it pertains to I 405 and supporting highways.	Please see response to comment E29.PPA-1.
E219	ALT	1	Barbara & Delmer barbdel@foxinternet.com Agency: Public	I am in support of improving traffic on the East side and would approve of the Alternative 3 if it were presented to me.	Please see response to comment L12.ALT-1.
E220	ALT	1	Larry Amans lamans@mcandrewsgroup.com Agency: Public	I support the adoption of Alternative 3. Only a significant increase in number of lanes will ease the traffic congestion on 405.	Please see response to comment L12.ALT-1.
E221	PPA	1	DeWitt A. Jensen JensenD@pbworld.com Agency: Public	I strongly support the preferred alternative. It is time to act on fixing I-405 now. Lets get on with it.	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Chapter 2 of the I-405 Corridor Program Final EIS describes the Preferred Alternative and why it was advanced, as well as the other alternatives that were considered, the improvements and modal elements contained in each, and their anticipated costs.

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E222	ALT	1	Paul D. Adams CUIPDAsafe@aol.com Agency: Public	Preliminary Preferred Alternative (Alt. #3) is a Good Start in trying to tackle a problem our elected officials should have been moving on at LEAST 20 years ago. Our area traffic situation has been too long hijacked by the no-growth bicycle lane crowd, and the result is obvious: businesses, large and small, are suffering and bailing out. Olympia should see the writing on the revetment walls, that their cash cows are being herded out, and that radical "sensitivity" to "endangered" plants and critters has created the economic downfall of our region in many ways, traffic congestion being just one of the symptoms of their PC disease. Count my tiny vote FOR Alternative #3.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E223	SOL	1	JohnL JohnL@connerhomes.com Agency: Public	I want to express my support for the widening of I 405 to help fix the conjestion on this road. Please move forward with this project.	Thank you for your comment.
E224	ALT	1	Larry Kyle lkyle@hdrinc.com Agency: Public	In my opinion, Alternative 3 provides the best mix of transit/HOV and general purpose traffic improvements. It appears that using busses for the high capacity transit portion of the regional system is the most affordable and flexible, utilizing the investments that have already been made in the HOV system. One key part of the HOV system is not in place though, and that is direct freeway to freeway HOV connectors. Those connections at I-90, SR 167, and I-5 need to be a part of this program. Until those links are completed, we do not have an effective HOV system, and we will not see the total benefit in HOV utilization, either with HOV private vehicles, vanpools or transit.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to the preliminary preferred alternative. It also includes direct freeway-to-freeway HOV connections.
E225	ALT	1	Kent Angier KentA@kauri.com Agency: Public	I am writing to express my strong support for alternative 3, adding two lanes each to the northbound and southbound lanes of I-405 in addition to widening the lanes on hwy 167 between Renton and Kent. It is vital for our future economic vitality to solve our traffic congestion problems. I hope that you will see the special interest groups that have organized against alternative 3 for what they are. Their mission is to eliminate growth by putting a tourniquet around our transportation systems. This ultimately reduces the quality of life for everyone, drives up the cost of living, and makes our region uncompetitive in the business arena. Their mission is the epitome of selfishness. They live and have what they want and they are going to do whatever is necessary to prevent others from sharing in it.	Please see response to comment L12.ALT-1.

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				Do what is best for everyone, and approve alternative 3. This should be fast tracked as a demonstration to businesses that contribute to our economic vitality that we are committed to solving our congestion problem. I don't work for Boeing or Microsoft or any other major employer but we all benefit from their presence. Let's do what we can to show them and other major employers in our region that we do appreciate what they do for our economy.	
E226	O	1	Jim Cusick Bothell jc.cusick@gte.net Agency: Public	There are 2 major points that I think are important. These are not meant to be conclusions drawn by detailed analysis, but fall more under the realm of "Selling It", which can have in impact just as great.	Thank you for your comment.
E226	COST	1	Jim Cusick Bothell jc.cusick@gte.net Agency: Public	1) Sub Area Equity. Most of the infrastructure and need on this project is occuring in East and South King County. While the computer models show that the need is not as great in the Snohomish County area, a facility with excess capacity is being proposed. The study area covers only a small part of Snohomish county, and North King County derives almost no benefit. When it comes time to sell this to the voters, the package will either have to include improvements for all of the Central Puget Sound region, or each mode must live within the tax revenues collected for that sub area. Sub Area Equity must be applied accross the whole spectrum if this is to gain acceptance by the public.	Implementation plans will require phasing and prioritization for funding. Higher-priority projects should be funded and constructed first, depending on funding source. Sub-area equity will be an issue if the public is asked to vote on funding improvements. There is precedent for establishing "firewalls" that could require funds raised within a sub-area to ultimately pay for projects constructed within that sub-area.
E226	ALT	1	Jim Cusick Bothell jc.cusick@gte.net Agency: Public	2) Not In MY BackYard, Not In My Front Yard. The need for more mobility is there, no doubt. The question is how much real estate are we willing to devote to it? This is what makes High Capacity Transit a superior alternative. It has the ability to absorb trips farther into the future than the roadway solutions described in Alternatives 2,3, & 4. While station locations will increase density in those areas, it will be pedestrian oriented. This does allow the areas between stations to remain at the current densities. What a rail solution does is allow for is the "Preservation of Suburbia". As more and more demand is	A fixed-guideway HCT system is included in Alternatives 1 and 2. However, it was determined that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. The Preferred Alternative includes the bus rapid transit (BRT) system that was evaluated in Alternative 3.

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				placed on a rail corridor, it does not get wider and wider. Train length increases, and frequency increases, but it must reach a very high level of ridership before more track needs to be laid. Electrifying the rail corridor is preferred, since this keeps the noise levels within acceptable limits. From personal experience, I can assure you that an electrified 2 track rail line is far superior as a neighbor than a 12 lane freeway for handling peak period demand. Alternative #2 comes the closest to satisfying both the current and future (beyond 2020) needs of the corridor. Lane balancing applied to this alternative would be especially effective.	BRT was documented to have similar ridership potential in the 2020 time-frame at a lower cost than a fixed-guideway rail system. Additional BRT capacity would remain after 2020. The I-405 Corridor Program Executive Committee also recommended further examination of HCT options, including rail, in the 'central core' area where transit ridership is highest. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E227	ALT	1	Einar Gundersen mge@american-engineering.net Agency: Public	Constant gridlock on I-405. The WA DOT, local elected officials, transportation experts and citizens have spent the last two years developing solutions to the mess on I-405. Alternative 3 was identified as the Preliminary Preferred Alternative and as the most cost-effective solution to reducing the traffic congestion on I-405. This letter serves to give my support to Alternative 3 and urge DOT to move forward with the plans accordingly. I live in Bellevue and use I-405 on a daily basis.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E228	ALT	1	Gerald L. Bordon gbordon@cadman.com Agency: Public	Please note that I support "Alternative 3" as the only viable and cost effective method to repair traffic flow problems on the I - 405 corridor. Review of the other alternative plans dictates by their own evaluation that they our a waste of precious resources and would end up as a bigger boondoggle than light rail has already become. Please push forward with "Alternative 3"	Please see response to comment L12.ALT-1.
E229	ALT	1	Bryan Grusz 22626 NE Inglewood Hill Rd #434 Sammamish, WA 98074 BryanG@connerhomes.com Agency: Public	I would just like to express my support for continued improvements to I-405. As a lifetime resident of the eastside I have seen traffic congestion and commute times increase to the point of frustration. Without drastic improvements in our transportation infrastructure I fear negative economic impacts on our great region. I've reviewed the four preliminary alternatives and strongly support Alternative #3. Alternative #3 is a well balanced solution providing the much need increased capacity, improvements in public transit, and targeting the troublesome bottleneck interchanges. Furthermore Alt #3 appears to be the most effective in the ever complex cost/benefit ratio. By working together our region can effectively meet our growing infrastructure needs in an ecologically sound manner while maintaining budget constraints.	Please see response to comment L12.ALT-1.

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E230	ALT	1	Mac Williams mailto:mwilliams@psfl.com Agency: Public	Please support Alternative 3 as the most cost-effective solution for reducing congestion and improving mobility on I-405. Thanks for your consideration.	Please see response to comment L12.ALT-1.
E231	PPA	1	Diana Kirchheim dianak@GSKonline.com Agency: Public	I wanted to express my views on the I-405 Corridor Program. The problem must be fixed. I support the Preliminary Preferred Alternative. Fixing the traffic problem in the greater Puget sound area is, in my view, one of the toughest issues facing our state. 405 is the worst freeway and drastically needs improvement. I hope you will listen to the citizens of the state and do something about it. This has been going on for decades.	Please see response to comment E29.PPA-1.
E232	ALT	1	Alan W. Fulp Alanf@charterbankwa.com Agency: Public	Wish to submit my support for alt. #3!	Please see response to comment L12.ALT-1.
E233	ALT	1	Jim Branshaw Jim@connerhomes.com Agency: Public	I support the Preferred Alternative Three to improve congestion on Interstate 405. I am a 2nd generation Washington native and have lived in the Eastside area for 20+ years. Conditions on 405 have steadily worsened and I feel this plan would be the most effective way to support relief of roadway congestion.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E234	ALT	1	Jolly Sue Baker 13009 230th Ave. SE Issaquah, WA 98027 jollysueb@deltasociety.org Agency: Public	Alternative 2 makes the best sense and is a reasonable alternative. We have been severally handicapped by the lack of good, rapid, public transportation on the Eastside. This alternative allows the people who keep insisting they need more lanes to get a couple and provides what we really need---good transportation.	Please see response to comment E31.ALT-1
E235	ALT	1	Jeannette Taylor jeannette@morseburg.com Agency: Public	I support alternative 3. I have grown up in this area and have watched the traffic get increasingly congested. I think that expanding the bus system in addition to adding traffic lanes is the best way to go. I support Alternative 3.	Please see response to comment L12.ALT-1.

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E236	PPA	1	Axel Iverson boarddork@earthlink.net Agency: Public	In response to the preliminary preferred alternative, This must happen. It is crucial to keeping our local economy on track. We're already losing businesses to other states because of our failure to keep up with the growth of our area. I'm a local builder and real estate developer and use these freeways daily. I lose hours of time daily in trying to get to work. These freeways are the backbone to the eastside economy. If we want to continue to provide jobs for everyone in this struggling economy than we must do this. The **secrret** of Seattle is out and people will keep moving in and working here because of all the opportunities and quality of life that a prosperous economy brings and they will never leave **solel ydue** to congested freeways. It's time to face reality and move with the times. Seattle is becoming a major city and hub of growth and deserves to have the transportation modes that this brings.	Please see response to comment E29.PPA-1.
E237	SOL	1	LJ lj@highridge.com Agency: Public	We must improve the traffic on 405 and do to the growth of the Seattle area we need to do a large improvement so that we do not have the same problem when the construction is done.	Thank you for your comment.
E238	SOL	1	John R. Skochdopole Barney@connerhomes.com Agency: Public	It's just simple cost-benefit analyses,folks. Please do your job, ask responsibly for our whole community, take human habitat into account, do what's best for the environment, the whole region and the free world and BUILD SOME ROADS. Our quality of life, level of transport productivity and auto pollution from idling have reached intolerable levels. The failure to provide roads and road corridors since the early 60s in King County is nothing short of gross negligience on the part of the planners in this State. BUY some right of way and plan for 25 years from now (not 5 years ago) like every other growing metropolis in this country does, ahead of time. Growth is coming whether you like it or not. (Thanks Mr. Gates, et al.) DO YOUR JOB !	Thank you for your comment.
E239	SOL	1	Teddy Overleese 123 Lake Street, #B-2 Kirkland, WA 98033 teddy@kirklanddowntown.org Agency: Public	I support the Preferred Alternative.	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Chapter 2 of the I-405 Corridor Program Final EIS describes the Preferred Alternative and why it was advanced, as well as the other alternatives that were considered, the improvements and modal elements contained in each, and their anticipated costs. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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E240	ALT	1	John "JJ" Johnston 200 112th Avenue NE, Suite 200 Bellevue, WA 98004 jjohnsto@windermere.com Agency: Public	I support the Preliminary Preferred Alternative (Alt.#3).	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E241	ALT	1	Ward J. Truess 8108 138th Ave. NE Redmond, WA 98052 Eagleprnt1@aol.com Agency: Public	I support the 3rd Alternative as detirmined by the exectutive commitee after two years of study as being the most efficient solution to improve this corridor.	Please see response to comment L12.ALT-1.
E242	ALT	1	Eugene F. Burwell 10302 SE 186th Street Renton , WA 98055 EugeneFBurwell@aol.com Agency: Public	I am writing to express my general support for Alternative 3 of the I405 programs. The addition of lanes on 405 is the only feasable way to relieve the traffic congestion that occurs between Renton and Bellevue 12 hours a day. I would also like to suggest that the planning process include solutions to removing automobiles that impede traffic. Automobiles involved in collisions without injuries and those that breakdown are more often than not, the usual source of significant traffic delays and excessive gridlock. Policies, procedures, and planning as well as emergency sites along the highway could do much to get these hazards off of the main highway before significant traffic delays occur.	Please see response to comment L12.ALT-1. Each of the action alternatives includes expanded incident managemant programs such as you suggest. These programs will consist of additional traffic service patrols, cameras to spot problems promptly, and improved communications along the corridor.
E243	ALT	1	Susan Franz susan@jmbogan.com Agency: Public	Subject: Support for the Preliminary Preferred Alternative (Alt. #3) I support the expansion of I-405 to accommodate the level of traffic volumes put on it. It is high time to end the gridlock that the public has endured in driving on this Interstate. In my opinion this region is way behind in keeping the roads up with the growth of the region. Especially in times like these, we need to see our economy rebound and grow; and having one of the worst traffic problems in the country is not enticing anyone to come to our area. We are in the remodeling business and our very livelihood depends on a healthy economy. This alternative was identified as the most cost-effective solution. Thank you for your careful thought in addressing these problems. Please move ahead with the necessary changes to the roadway.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.

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E244	ALT	1	David Crowell dcrowell@nwrealtor.com Agency: Public	I am writing to support the Preliminary Prefered Alternative (Alternative #3) for the 405 Corridor. This is the best alternative for the following reasons: Reducing congestion on 405 will improve our quality of life by giving us more time with our families. The Preliminary Preferred Alternative offers the most cost effective congestion relief. Alternative #3 provides the biggest return on investment of all the alternatives. Our livelihoods depend on improving 405 - our economic future for ourselves, our children and our grandchildren depends on improving 405. We cannot afford to lose our economic vitality, and it's unacceptable to have businesses leave this area because of traffic congestion. The Preliminary Preferred Alternative offers an opportunity to improve the environment by restoring and enhancing systems to mitigate existing environmental problems. Reduced congestion improves air quality and our quality of life. The Washington State Department of Transportation's 405 Corridor Program is a model for building public consensus for future transportation improvements. Decreasing congestion on 405 will improve safety in neighborhoods along the corridor by reducing cut-through traffic from drivers seeking relief from 405. Many cities in the eastside have endorsed Alternative 3.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E245	ALT	1	Harold Duncanson haroldd@duncansonco.com Agency: Public	I am writing to support the preliminary preferred alternative (Alt 3). It seems obvious that adding capacity and fixing bottle-necks is required to make this a functioning road system.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
E246	ALT	1	Scott A. Robertson 411 108th Avenue NE, Suite 210 Bellevue, WA 98004 scottr@kmsoncor.com Agency: Public	I support the Preliminarily approved Alternative #3 for the improvement of the I-405 corridor. This transportation corridor is the critical link for the Eastside and beyond and will be best served by the preferred alternative #3. I look forward to the improvements that will come as a result of adoption of this plan.	In January 2001, the Executive Committee for the I-405 Corridor Program recommended a preliminary preferred alternative that represented the committee's then current thinking on the direction of the program. The preliminary preferred alternative was a non-binding polling of the committee based on information provided in the available expertise reports and preliminary feedback from the

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					Steering Committee and Citizens Committee. When the preliminary preferred alternative was developed, no decision was made by the co-lead agencies to implement any alternative. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E247	SOL	1	Gary Hodge garyh@highridge.com Agency: Public	Some of the reasons changes need to be made to improve the traffic flow on our highway are obvious. I guess the one reason that seems the most important is the simple fact that most people will always prefer to drive over any other form of transportation. Why is this? Because they have control over their time. They don't have to feel crowded or corralled into buses, trains or even planes for that matter. They will always prefer to drive because there is security and self expression you cannot achieve around other people. In conclusion drivers will continue to grow and highways will need to as well. I am for this Preferred Alternative and would be interested in additional upgrades as well.	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Chapter 2 of the I-405 Corridor Program Final EIS describes the Preferred Alternative and why it was advanced, as well as the other alternatives that were considered, the improvements and modal elements contained in each, and their anticipated costs. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E248	SOL	1	Kelley Albert kelley@artisticdrywall.com Agency: Public	As a business our company must function efficiently. Unfortunately, the growing traffic problems have made it difficult for my business to conduct itself in a timely manner. Over 90% of my employees drive from job site to job site everyday. I am writing to show my support of adding two new general traffic lanes each direction to I-405, fixing highly congested areas of the highway such as SR 167 / I-405 interchange, developing an expanded express and local bus system focused on the HOV lanes along I-405, and also widening a portion of SR 167 from Renton to Kent. Our trucks may not be able to use the HOV lanes or the public transit system, but this I believe will even out the congestion enough for my employees to get to work with less hassle while saving company's funds to be spent elsewhere.	Thank you for your comment.
E249	ALT	1	Peter A Bartnick peter.a.bartnick@boeing.com Agency: Public	As a resident of Kirkland who works in Renton, I would like to voice support for Alternative 3 of the 405 capacity studies. I think a mix of new lanes for general traffic and improvements to transit is the most realistic approach to solving the woes on the 405 corridor.	Please see response to comment L12.ALT-1.

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E250	PPA	1	Kevin Kartak kkartak@kartakglass.com Agency: Public	I was born in Seattle, and have lived and worked in the Puget Sound Area all my life. I strongly support adding new lanes and fixing bottlenecks on I-405, as described in the "Preliminary Preferred Alternative". Please help us traffic bound people and do just that.	Please see response to comment E29.PPA-1.
E251	ALT	1	Howard Stirk HStirk@aol.com Agency: Public	I work in the trucking industry, but I also live on the 405 corridor in Bothell. This highway is one of the most congested roads in the state. I want to register my support for Alternative 3.	Please see response to comment L12.ALT-1.
E252	ALT	1	Kimberly A. Searing ksearing@shuttleexpress.net Agency: Public	I would like to express my support of Alternative 3, the Preferred Alternative for reducing congestion and improving mobility of I-405. I have lived in Renton my entire life and I'm a business owner interested in making our city more accessible to the general public. In addition I am the Chief Financial Officer for Shuttle Express, Inc. located in Renton near the intersection of I-405 and SR-167. Our business reduces road congestion using share-ride to transport 600,000 guests to and from Sea-Tac Airport each year between Everett and Tacoma. Alternative 3 provides for improvements key to the success of our high capacity operation including direct HOV ramps added to I-405 and the widening of SR-167.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E253	ALT	1	Greta N Ward gretaw@avaya.com Agency: Public	As someone who takes 405 every day to work the only alternative that would work for me is Alternative 4 (general capacity). The other alternatives fall short in that I have to transport my children to daycare, and be available if the daycare calls for me to take them home. Additionally, my work (in Redmond) is not close enough to a mass transit route/center. If there were some form of mass transit that I could pick up on Tukwila and take me to the doorstep of my work in a timely fashion (30-45 minutes), that would be an option if it ran often enough during the day. Otherwise the only reasonable option for me is Alternative 4. As much as I like the idea of mass transit, it only works well for a densely populated area.	Please see response to comment L30.ALT-1.
E254	ALT	1	James C. Walker BarbaraD@ci.newcastle.wa.us Agency: Public	The City of Newcastle recognizes the urgent need for improvements to the I-405 corridor and we are pleased to have the opportunity to review the draft EIS document. I believe that the selection of a mixed mode alternative like alternative 3 is the only practical way to improve mobility in the corridor.	Please see response to comment L12.ALT-1.

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E254	SOL	1	James C. Walker BarbaraD@ci.newcastle.wa.us Agency: Public	One issue of concern to the City not directly addressed in the report is preservation of the Burlington Northern Santa Fe rail right of way corridor. That corridor or portions of it could easily be the backbone of any future fixed mass transit system within the I-405 corridor. Obtaining that corridor for future transit use may be outside the scope of improvements considered for the I-405 corridor but we do not want to see anything initiated which would preclude future use of the rail right of way.	The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E254	TR	1	James C. Walker BarbaraD@ci.newcastle.wa.us Agency: Public	Another concern of the City is the effect improvements to I-405 will have on the arterials that connect to I-405 from parallel arterials. The document adequately addresses the effect on parallel arterials but not on the arterials that feed directly on to I-405 that will see higher traffic volumes with reduction of congestion on I-405. We are particularly concerned with pedestrian safety along those roads in the City that would see higher traffic volumes but do not currently have adequate sidewalks.	Please refer to the response to comment L57.TR-2 (Same comment)
E254	TR	2	James C. Walker BarbaraD@ci.newcastle.wa.us Agency: Public	The criterion: "Reduce Congestion on Study Area Freeways and Arterials Below Current Levels Area" found on page 3.12 – 19 is not achieved for the road segment NE Park Dr. to I-90. Since this is the segment directly adjoining Newcastle we would like to see a solution that would decrease congestion along all segments of I-405.	This segment will be further examined as part of follow-on environmental analysis, documentation, and review.
E254	ROW	1	James C. Walker BarbaraD@ci.newcastle.wa.us Agency: Public	We would like to see acquisition of real properties needed for highway system improvement occur as soon as practical to avoid further development on parcels to be acquired.	Please refer to response to comment L57.ROW-1.
E255	ALT	1	Linda Rasmussen 17122 163rd Place SE Renton, WA 98058 emracers@msn.com Agency: Public	After reviewing the alternatives for the I-405 corridor, my least favorite is the Preferred Alternative 3.	The Preferred Alternative is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E255	COST	1	Linda Rasmussen 17122 163rd Place SE Renton, WA 98058 emracers@msn.com Agency: Public	At a time when we need to make our dollars count more than ever, I believe Alternative 3 is far too expensive and does not use our dollars wisely.	Thank you for your comment.

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E255	TR	1	Linda Rasmussen 17122 163rd Place SE Renton, WA 98058 emracers@msn.com Agency: Public	Data by the Texas Transportation Institute show that an "increase in driving" more than an increase in population causes traffic congestion and the more road capacity, the more traffic generated. It is a vicious cycle that can be remedied only by more creative transportation choices.	Please see the response to comment E66.SOL-1 related to induced travel.
E255	SOL	1	Linda Rasmussen 17122 163rd Place SE Renton, WA 98058 emracers@msn.com Agency: Public	This is why Isupport Alternative 5 as proposed by Sensible Solutions for 405. Their alternative is less expensive, it is completed in half the time, and it will have less adverse impact to the environment. I am making a sensible choice tomorrow. I must go to King County Superior Court because of a jury summons. I am taking the bus for the first time in years. Why? Because the freeway is congested and the cost of parking downtown is prohibitive. More important, I can catch the bus just a block from where I live, and I won't have to wait alone tomorrow morning in the dark, because I know my neighbor will be there--he's been taking this bus to work for years. You see, I'm lucky to live in a neighborhood where neighbors know each other. The best part of tomorrow's journey is that the bus takes me directly to the bus tunnel downtown, and when I get off at the Pioneer Square transit stop, the courthouse is almost directly above. Good neighborhoods, good choices, good planning--more bang for the buck. Please seriously consider Alternative 5 as proposed by Sensible Solutions for 405.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E256	SOL	1	Lauren Braden 8050 35th Ave NE Seattle, WA 98115 laurenb@seattleaudubon.org Agency: Seattle Audubon Society	I am writing on behalf of the 5400 members of Seattle Audubon Society to comment on the I-405 expansion DEIS. Our membership spans much of King County, including areas around Interstate 405 such as Mercer Island, Bothell and Renton. The mission of Seattle Audubon is to protect birds and the natural environment by involving volunteers and the community in education, advocacy, preservation, science and enjoyment. Seattle Audubon supports sustainable and livable communities to help reduce suburban sprawl and protect wildlife habitat. We believe that land use and transportation are inextricably-linked, and we carefully considered the costs, time, expected results, and impacts of the proposed Alternatives in order to draft our comments. Unfortunately, the proposed Alternatives fell short, and we urge you to analyze and consider Alternative 5, recommended by Sensible Solutions for 405.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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E256	ALT	1	Lauren Braden 8050 35th Ave NE Seattle, WA 98115 laurenb@seattleaudubon.org Agency: Seattle Audubon Society	WSDOT's Alternative 3 is seriously flawed in four key areas: 1) Constructing two new general-purpose lanes in each direction will not work. The old solution to the gridlock problem has been to simply build more roads, but the old ways do not work anymore. In fact, building new freeways or additional lanes to address these issues can exacerbate the existing problems. Independent studies, local experience, and the experiences of other regions show that reliance on new lanes creates more traffic. In addition, Alternative 3 would take eighteen years to complete construction, resulting in nearly two decades of diminished capacity in the corridor, with one or more lanes out of service. With diminished capacity and without adequate alternatives, traffic would actually worsen for nearly two decades. 2) It is too expensive. We cannot afford the $8 billion price tag; such massive tax increases are not realistic and it would take more than half a century to pay for. We must remember there are other needs for our transportation dollars, such as a strong backing for the exploration of additional capacity in the form of mass transit, earthquake retrofitting, the I-5 High Occupancy Vehicle lanes and the Trans-Lake improvements, and that the Puget Sound Regional Council documents an approximate $5 billion shortfall for transportation investments over the next 30 years. 3) Alternative 3 will harm people and neighborhoods by increasing traffic on local streets and the loss of greenspace. It proposes widening dozens of miles of neighborhood arterials, taking away people's front yards and increasing neighborhood traffic, in order to accommodate the increased number of cars heading to I-405's additional capacity. 4) It will increase noise, air and water pollution and worsen sprawl. Numerous studies show that increasing general purpose lane capacity encourages people to drive more, generating further sprawl. The additional freeway and arterial lanes lead to more oil-laden run-off into salmon streams. The increased sprawl leads to more habitat destruction and more air and water pollution. The increased number of single-occupancy vehicles on the roads will generate more air pollution and greenhouse gas emissions.	Please refer to the response to comment E66.SOL-1.

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E256	SOL	2	Lauren Braden 8050 35th Ave NE Seattle, WA 98115 laurenb@seattleaudubon.org Agency: Seattle Audubon Society	Seattle Audubon Society supports the thrust of "Alternative 5" as proposed by Sensible Solutions for 405. Alternative 5 is clearly a better solution for taxpayers, neighborhoods, commuters, and the environment of the Central Puget Sound Region. It would produce the desired results in about half the time and for half the cost as Alternative 3, focusing on strategic road improvements at key traffic choke points, an aggressive trip reduction program and significantly more buses, vanpools and park & rides. Our current traffic congestion problems are not an inevitable consequence of the healthy growth of our metro areas. These problems appear to be more closely linked to the sprawling development patterns that require so much driving. In addition, congestion is not easily alleviated through adding road space. Traditional, road-based approaches to fighting congestion are not working very well, and transportation officials would be wise to focus their efforts on more innovative techniques. We urge you, again, to analyze and support Alternative 5.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. The Preferred Alternative provides a balance of roadway, transit, and demand management strategies that has been determined by the Puget Sound Regional Council to be consistent with the framework policies in VISION 2020, the region's long-range growth and transportation strategy, and Destination 2030, the adopted regional metropolitation transportation plan. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1 regarding induced travel effects.
E257	ALT	1	Hal Woosley hal@woosleyproperties.com Agency: Public	I wish to join the supporters of the Preliminary Preferred Alternative #3 as requested by the Move On 405 Group because it appears to have more capacity for general purpose vehicles (two additional lanes beside the two that are already there.) After more than twenty years of intense marketing of public transit systems by the governing bodies, who are responsible for providing the necessary transportation infrastructure for an ever-increasing population, the traveling public has shown that only a small percentage are willing or even able to use busses or trains. The traveling public has voted with their feet and their vehicles. The ratio of those few who ride public transit has not changed over the last several years even though the population has increased. The numbers change but the ratio remains the same. The problem is how to allow the most people to move around freely on the I-405 corridor. Most will not ride the bus, for a whole lot of reasons. We must build more lanes. Consider this: If five percent of the population increase of adults ride public transportation there will be ninety-five who will be moving around in single driver vehicles, including trucks, service vehicles etc. Even the busses roll on pavement. Clearly we must build more general purpose lane capacity to keep ahead of the population growth.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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E258	SOL	1	Jessica N. Greenway 7405 131st Place NE Kirkland, WA 98033 jessica@jessicagreenway.com Agency: Public	I am taking the time to write about the I-405 Corridor Program because I really care about my community. I think some good work has been done to come up with the 4 alternatives proposed, and I think all of them have some good components, but I don't agree with or support Alternatives #3 or #4. Both of these alternatives are too expensive and will expend I-405 to the detriment of surrounding communities with no lasting solutions to the problems of congestion. I do not support construction of additional lanes on I-405, with the exception of adding lanes which serve to make the number of lanes consistent along the entire route. Alternatives #3 and #4 are both too expensive, will take to long to implement, will result in long disruptions because of construction, and will not produce a lasting solution to congestion. I agree with Alternative #5, which has been proposed by Sensible Solutions for I-405. This plan is reasonable and rational, is more affordable, and deals realistically with transportation solutions. I support this alternative, and am willing to help pay for it as a taxpayer. I also sent my comments in writing. Please email or call me at my office, at 206-292-2103, with questions. Thank you.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.
E259	ALT	1	John Niles 4005 20th Avenue W, Suite 111, Seattle, WA 98199 USA jniles@alum.mit.edu Agency: Public	To WashDOT: Having been briefed on the results of the I-405 study process resulting in a draft EIS, I support the pursuit of Alternative 3 as developed by the I-405 Study Process, including the transit and road-building aspects of it, and all other features. The process of defining this alternative and its competitors appears fair, as well as the choice of number 3 as preferred. I especially support Intelligent Transportation System enhancements such as electronic signs and flow monitoring that will be included in capacity expansion. I suggest that additional consideration be given to making the HOV lanes able to be converted into HOT lanes with tolled access for vehicles that do not meet the occupancy minimums. I specifically suggest that the design of all expansions specifically take into account the requirements of best practice, rapid road clearing processes by authorities following blocking incidents and accidents of cars and trucks. Accidents and incidents are responsible for the majority of congestion on most freeways.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. The Preferred Alternative includes a recommendation to consider managed lanes in the design of the freeway widening. The FEIS includes the environmental impacts of potentially converting I-405 to a managed facility. The issue of tolls was not recommended for inclusion in the Preferred Alternative, but will be further evaluated by WSDOT in a regional context. Incident response will be an integral part of the Preferred Alternative freeway strategy. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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				I specifically reject the "alternative 5" proposal that has gathered much ink. I don't see fixed-guideway access as sufficiently better than Bus Rapid Transit alternatives, and the limits on general capacity expansion are too severe. I make these comments as an infrequent personal user of I-405, but with the understanding that this facility is critically important to the economic and social health of the entire region.	
E260	PPA	1	Rowan Hinds rowanhinds@worldnet.att.net Agency: Public	I want to add my support to the Preliminary Preferred Alternative (PPA) for I-405 road improvements. It is truly a multi-modal approach to solving our problems with congestion on I-405. In spite of what the opponents of the PPA say, the PPA does address the issue of congestion in a holistic manner that is sensitive to the environment. In addition, because our economy is so dependent on the automobile, until we are able to find a suitable transportation alternative, it is required of the government to provide the infrastructure to support the private investment made in cars - by far our most effective and efficient mode of transportation. When our buses fill up, we think nothing of adding more bus capacity - it is an obvious need; therefore, why not build more road capacity, as well as adding transit, when our cars fill up our existing road capacity? The PPA does that. Thank you for your time, please make the right decision and move forward with the PPA.	Please see response to comment E29.PPA-1.
E261	COST	1	Karin Frost Blakley 11208 SE 74th Street Newcastle, WA 98056 kfblakley@lycos.com Agency: Public	I am very concerned that the I-405 alternatives that have been submitted for public comment are much too expensive for the results they would deliver. In talking to people with transportation backgrounds, I have learned after the ten to twenty years of construction being proposed, that traffic flow along the I-405 corridor will only improve at best 15%-20%. In addition to thelackluster improvement the proposals would deliver, the tremendous amount of traffic disruption that we would endure while waiting for the project to be completed must also be taken into consideration. In short, life for those of us who utilize the I-405 corridor will be extremely tough during thoseconstruction decades.	Travel demand within the corridor is expected to grow by 56 percent over the next 20 years based on increases in population and employment. A benefit-cost analysis of the alternatives showed that Alternatives 2, 3, and 4 could have a net positive return. Your concern about construction impacts is noted. Large corridor segments will be constructed within a 5-6 year period using design-build. Construction activities will be planned to create minimum disruptions to peak-hour traffic flow.

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E261	TR	1	Karin Frost Blakley 11208 SE 74th Street Newcastle, WA 98056 kfblakley@lycos.com Agency: Public	Further, it just doesn't make sense to me that we pour all of this money into a single North/South traffic corridor on the Eastside. For not only will you create a nightmare for commuters and cargo traffic during the construction years, you will create a road that will remain a problem area whenever there is an accident in either direction or significant growth in the area. That's because we have no transportation options on the Eastside, and no matter how many lanes you build along the I-405 corridor, you will impede traffic in both directions when an accident occurs or when growth results in significant traffic increases.	The jurisdictions along the corridor have chosen to focus the investment during the next 20 years into improving the I-405 facility.
E261	ROW	1	Karin Frost Blakley 11208 SE 74th Street Newcastle, WA 98056 kfblakley@lycos.com Agency: Public	Of additional concern to me is the cost of land acquisition along the I-405 corridor. I have to believe that it will be some of the most expensive land to acquire in the state because a great deal of the land in the south area is view property and close to Lake Washington. Additionally, because businesses and residences have been built so close to I-405, you will have quite a few legal battles from people who won't want to abandon their homes and businesses, as well as complaints from people who strongly object to the additional noise and pollution of the construction and increased traffic.	Attempts will be made to mitigate acquisition impacts to real property wherever feasible and practicable. The high cost of land along the I-405 corridor is recognized; therefore, acquisitions will be kept to a minimum. All property will be acquired pursuant to the Uniform Real Property Relocation and Acquisition Act. The State has procedures in place to implement this federal legislation. This Act contains provisions for payment of certain relocation expenses for residences and businesses. No property will be acquired for less than fair market value as required by the Act. Finally, any property owner who disputes the offered purchase price and cannot agree with the acquiring agency as to just compensation can take the dispute to court.
E261	SOL	1	Karin Frost Blakley 11208 SE 74th Street Newcastle, WA 98056 kfblakley@lycos.com Agency: Public	As someone who uses I-405 on a daily basis, I would much rather see the following: 1) Improvements made to the on and off ramps and the interchanges (particularly Highway 167 and the 44th street on and off ramps) as much of the traffic problems occur due to the difficulty motorists have when merging onto the interstate. 2) Investment made in a NEW north/south eastside highway, perhaps through Redmond and Issaquah and points south. This new highway would offer motorists a north/south option when the traffic on I-405 is difficult, and it would more adequately address the growth situation in that part of the state. 3) A high speed train installed from Redmond, through Bellevue and on to Downtown Seattle. This train would relieve a great deal of pressure on the 520 bridge, as well as be potentially less objectionable to the residents of Medina, Clyde Hill and the other residential communities close to 520. Best of all, it would be a train that would be highly utilized, particularly if it was state-of-the-art.	In response to your suggestions: (1) Specific improvements are included at most interchanges along the corridor. The SR 167 interchange will receive a high priority. (2) Such a highway was studied during the early part of the I-405 screening process. While a new roadway was found to have some benefits, it was removed from consideration as part of the I-405 Corridor Program since it was outside of our study area and has a multitude of environmental and land use issues that would need to be examined further in its own study. (3) Alternatives 1 and 2 include the effects of such a rail system. However, it was determined that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced,

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				In summary, the I-405 proposals I have seen will be much too expensive for the results that they promise. They also fall far short of adequately addressing our current and future needs, and could well be argued as situations in which we are throwing good money after bad.	please see Chapter 2 of the Final EIS. The Trans-Lake Washington project is examining in greater detail the feasibility of a rail system across Lake Washington.
E262	ALT	1	Jim MacIsaac Bellevue jmacisaac@qwest.net Agency: Public	I offer comments in strong support of the Corridor Program finding for Alternative 3 as the Pre-ferred Alternative to be maintained by the Executive Committee. It appears to be the best alternative to meet the adopted Program need and objective: To improve personal and freight mobility and reduce foreseeable traffic congestion in the (I-405) corridor … in a manner that is safe, reliable and cost-effective (page 1-2). The I-405 Corridor Program study team and its oversight committees have done a very thorough job of evaluating alternatives for corridor improvements to meet 2020 multi-modal corridor ob-jectives, and in conducting an exemplary process of public education and interaction.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E262	ALT	2	Jim MacIsaac Bellevue jmacisaac@qwest.net Agency: Public	Alternatives 1 and 2 attempt to meet the program need through an emphasis on major invest-ments in public transit and aggressive TDM strategies. However, they fall far short of meeting the corridor Program Need statement for freight and non-HOV traffic components.	Thank you for your comment.
E262	ALT	3	Jim MacIsaac Bellevue jmacisaac@qwest.net Agency: Public	Alternative 3 fills in the shortfalls of Alts 1 and 2. Furthermore by implementing a corridor bus rapid transit (BRT) system element rather than a light rail system element, Alt 3 appears to better optimize transit use while producing a reliable and far more cost-effective public transit element. With the added HOV lane separation and safety elements, Alt 3 also provides a much safer and faster system for 3+HOV travel that accommodates 75% of the Transit/HOV person trips.	Please see response to comment L12.ALT-1.

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E262	TR	1	Jim MacIsaac Bellevue jmacisaac@qwest.net Agency: Public	My comments focus upon the mobility, reduce traffic congestion and cost-effective challenges in the Program needs statement. DEIS Section 3.12 – Transportation addresses corridor travel per-formance using estimated 2020 travel forecast findings at three selected screenlines. The supporting travel data is provided in Appendix I of the DEIS. The significance of this data is somewhat lost in the extensive DEIS presentation. The following chart summarizes the Total Person Trips data by mode from Appendix I for the three-screenline average. The dashed line near the top reflects the 2020 average weekday corri-dor person travel demand that the corridor program needs to satisfy to achieve the corridor mo-bility need. The bars for each alternative reflect the amount of that demand accommodated by each program alternative. (SEE ORIGINAL E-MAIL ATTACHMENT FOR BAR CHARTS)	Thank you for your insights regarding other ways to depict the travel data.
E262	ALT	4	Jim MacIsaac Bellevue jmacisaac@qwest.net Agency: Public	No Action falls far short of meeting the corridor mobility need. (Note that the white area at the top of the first three bars shows the portion of demand that is not met by that particular alterna-tive). By not meeting corridor travel demand, personal and freight traffic … congestion will continue to increase in the corridor. Alternative 1 found that aggressive transit and TDM actions alone will do little better than No Action in achieving the program prime objective. Alternative 2 closes the people-movement shortfall by half by adding one GP lane in each direction. But Al-ternatives 3 and 4 are the only program alternatives that meet or exceed the prime mobility objective of the Corridor Program.	Thank you for your comment.
E262	ALT	5	Jim MacIsaac Bellevue jmacisaac@qwest.net Agency: Public	The other important element of the program need statement is: … in a manner that is safe, reli-able and cost-effective. The second chart summarizes the capital cost estimates for each alternative by travel mode, using the information shown on page 2-16 of the DEIS. Of the $5.3 billion total cost of Alternative 1, $4.4 billion would be invested in fixed guideway HCT. How-ever, as seen in the upper chart, transit use gains little against the unmet corridor person and freight travel demand. Alternative 2 adds $2.5 billion in freeway and arterial capacity enhance-ments plus more transit/ HOV improvements compared to Alt 1. It becomes a much more expensive alternative, but still does not meet corridor mobility demand.	Thank you for your comment.

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E262	ALT	6	Jim MacIsaac Bellevue jmacisaac@qwest.net Agency: Public	Alternative 3 takes a hard look at the high cost of the HCT elements of Alts 1 and 2, and substi-tutes a far more cost-effective BRT alternative that accomplishes nearly the same level of transit use. Some of the cost savings are reinvested into another pair of freeway lanes to accommodate the remaining person travel demand shortfall of Alternative 2, yet Alternative 3 shaves nearly $2 billion in capital costs from the Alternative 2 action option. A primary measure of cost-effectiveness is obtained by dividing the cost of corridor investment by the additional trips accommodated relative to the people-moving performance of the No Ac-tion alternative. The bottom line on the lower chart shows the product or "relative index" that results from this calculation. For example, this shows that Alternative 1 would cost $782 per ad-ditional trip accommodated compared to $62 for Alternative 3. Alt 1 is estimated to accommodate only 2% more person trips than accommodated by No Action. That combined with the high cost of fixed guideway HCT results in the extremely poor cost-effectiveness rating for Alternative 1. The added pair of GP lanes in Alt 2 accommodates eight times more new trips over No Action compared to Alt 1 to make a significant improvement in the cost-per-additional-person-trip-accommodated index. Alternative 3 reduces that index by more than half again. In summary, Alternative 3 not only meets the corridor mobility objective, but it also meets the criterion for cost-effectiveness by far compared to the other alternatives. These findings are all based upon information disclosed in the Program DEIS. The Executive Committee is well-informed and well-advised to maintain Alternative 3 as the Preferred Alternative for achieving the needs and objectives of the I-405 Corridor Program.	Thank you for your comment.
E263	ALT	1	David E. Perrin Dave@citcwa.com Agency: Public	I travel the I405 route daily to and from work - and often while out on business. The congestion - often even at 10 AM or 3PM has a very negativeimpact on my time, my productivity, wear and tear on my vehicle, and on gasmileage. I have reviewed the four reasonable alternatives in the I-405 Corridor Program, Draft EIS - Executive Summary. In my view Alternative #3 would be most effective.	Please see response to comment L12.ALT-1.

Code Number			Name	Comment	Response
E264	ALT	1	John Bredeson jbredeson@psfl.com Agency: Public	Please support Alternative 3 to the I-405 Plan. It's the most cost effective way to deal with the enormous congestion problem on I-405. Puget Sound Truck Lines moves approximately 30 loads daily over I-405. We work hard, with our customers help, to move as many as possible between 8PM and 6AM, in order to avoid the congestion. However, it's not possible for many reasons, to move any where's near all the loads during those hours. Alternative 3 makes sense.	Please see response to comment L12.ALT-1.
E265	PPA	1	Ted Vander Hoek ted@weathervanewindows.com Agency: Public	I am a business owner who lives in Bellevue, but have my business in Kirkland. We manufacture windows for new construction. As such, we have delivery trucks using the 405 corridor eight to ten hours every day. This is expensive, not only for my customers, but for my employees who must fight this traffic each morning and night. As far as my customers are concerned, they pay me the extra cost for this traffic congestion and pass it on to their customers, the new home owners. No wonder there is no affordable housing in King County! I have a rule that I am never in Bellevue after three o'clock because after that, it is solid stop and go from SR520 to my exit at 20A. Today I was ten **minuets** late and sure enough, fifteen minuets to go four miles! Business and commuters need action now! The costs to business and commuters in lost time is a cost our economy can't afford. Please move the "Preliminary Preferred Alternative" along as my first choice to solve this mess.	Please see response to comment E29.PPA-1.
E266	O	1	Jonathan Dubman 2014 E Calhoun St. Seattle, WA 98112 (206) 322-8899 john@dubman.com Agency: Public	This study is flawed in that it does not adequately take into account the forthcoming results of the Trans-Lake Washington Project, nor the results of proposed changes to lane configuration on I-90.	Please refer to the response to comment L41.CU-8.

Code Number			Name	Comment	Response
E266	SOL	1	Jonathan Dubman 2014 E Calhoun St. Seattle, WA 98112 (206) 322-8899 john@dubman.com Agency: Public	Another, even larger problem, is that some of the best "solutions" to the purpose and need of this study are considered outside the scope of the study. This speaks to the benefits of creating a regional, systemic solution to freeway congestion that incorporates comprehensive regional high capacity transit, congestion pricing for SOV's, increasing the gasoline tax, and a dramatic change in long-term plans for land use patterns both on the large and small scale. None of the alternatives cited explicitly support this scale of effort; Engaging on a large scale construction project on I-405 without this regional approach is like doing heart bypass surgery for a three-pack a day smoker with high cholesterol, while he makes a weak commitment not to go to four packs a day. We need to correct the "bad habits" on a regional scale if we are going to be healthy in the long term.	As discussed in the Summary and Chapters 1 and 2 of the I-405 Corridor Program Draft EIS, this is a corridor-level study that considers potential solutions to achieve the adopted purpose and need within the 250-square-mile study area. This is already the most encompassing transportation study ever undertaken at this level of detail in the state of Washington. The potential regional solutions that you suggest could be complemented by the Preferred Alternative if adopted by the state or region, but as you acknowledge, they are not ones that could be effectively implemented as corridor-level solutions.
E266	LU	1	Jonathan Dubman 2014 E Calhoun St. Seattle, WA 98112 (206) 322-8899 john@dubman.com Agency: Public	The flaws with the seemingly simple solution of increasing general purpose capacity as a way of relieving congestion have been pointed out time and again by innumerable individuals and groups, and I won't go into that here, aside from saying that I agree with those who acknowledge that that is ultimately counterproductive. (Remember, I-405 itself was built as a bypass!) Sprawl has real consequences. It is not exactly a suburban idyll we have built in the I-405 corridor, beautiful neighborhoods notwithstanding. The Eastside has worse traffic congestion than Seattle, and fewer alternatives to boot.	Please see the responses to comments L27.LU-1 and E66.SOL-1.
E266	SOL	2	Jonathan Dubman 2014 E Calhoun St. Seattle, WA 98112 (206) 322-8899 john@dubman.com Agency: Public	As it stands, automobile drivers and the trucking industries are heavily subsidized by numerous levels of government. Drivers do not pay the true cost that their behavior incurs on others. Increasing the gasoline tax is a blunt instrument that can be somewhat effective, if somewhat regressive economically. The most effective way to attack congestion is to implement peak-hour congestion pricing for single occupant vehicles, with some of the funds going to a vastly improved transit system. There are studies too numerous to mention here that support this approach. Usage fees can be found in most large metropolitan areas, but not yet in Washington, unless you include the ferry system. Chicago, New York, California, lots of other large scale metropolitan areas in the U.S. and almost all European countries put a price on some of the most congested roads. It's time for Washington to do the same.	Consideration of regional pricing strategies was supported by the Executive Committee. It was determined that these strategies should be examined by the Puget Sound Regional Council, and implemented on a regional basis rather than within the I-405 Corridor Program itself.

Code Number			Name	Comment	Response
E266	ALT	1	Jonathan Dubman 2014 E Calhoun St. Seattle, WA 98112 (206) 322-8899 john@dubman.com Agency: Public	Enduring the financial, environmental costs and the years upon years of disruptive construction of an alternative such as Alternative 3 in what would ultimately be a failed attempt to relieve congestion is pure folly. We can't afford it, and it would be a huge step in the wrong direction. Just when Bellevue, Kirkland and Redmond are finally achieving the kind of concentration to make regional high capacity transit feasible, and when we've got a lot of the necessary right of way readily available for that transit in the BNSF corridor, are we going to remove more homes, businesses, and wetlands to widen the freeway that itself is one of the biggest impediments to smart growth?	The Preferred Alternative represents a blending of expanded highway capacity and an extensive network of high-capacity transit in the form of bus rapid transit. Portions of the corridor could be expanded into a rail transit system as demand warrants.
E266	SOL	3	Jonathan Dubman 2014 E Calhoun St. Seattle, WA 98112 (206) 322-8899 john@dubman.com Agency: Public	The street topology in the I-405 corridor does not allow for enough alternate routes of travel, and I-405 itself is a significant impediment to travel in the perpendicular direction. Better local street networks, along the lines of what Bothell has recently proposed, need to be part of the solution.	The Preferred Alternative (and Alternatives 3 and 4) include several arterial street improvements. Few new streets have been proposed, however, due in part to the topographic constraints that are mentioned.
E266	ALT	2	Jonathan Dubman 2014 E Calhoun St. Seattle, WA 98112 (206) 322-8899 john@dubman.com Agency: Public	Of the alternatives listed in this Draft EIS, by far the best is Alternative 1, High Capacity Transit/TDM Emphasis.	Please see response to comment E15.ALT-1.
E266	SOL	4	Jonathan Dubman 2014 E Calhoun St. Seattle, WA 98112 (206) 322-8899 john@dubman.com Agency: Public	But this by itself is not sufficient. I do favor Alternative 5, put forward by Sensible Solution for I-405, though even that does not go far enough. We need to plan for a regional high capacity transit system that builds on and reinforces the existing areas of high activity. Transit needs to directly serve areas of dense activity; it needs to be more than a bunch of express buses running in HOV lanes along I-405 with some expensive access ramps that ferry patrons from one monumental parking lot to another. We need to evolve the zoning laws to allow more daily needs to be met within walking distance of people's homes, and to make the neighborhoods along I-405 more walkable. We need to concentrate future growth in pockets of urbanity surrounded by the existing fabric of low density suburbia, while discouraging new growth into rural areas like Redmond Ridge. We need to make it easier, safer and more direct for bicycles and pedestrians to get where they need to go, not just for recreation, but for daily life.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. All of the action alternatives would provide new and expanded transit service and facilities, as well as improved connections and crossings of I-405 for bicycles and pedestrians. Like the Sensible Solutions proposal, the Preferred Alternative also provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, a new bus rapid transit system, and increased emphasis for transit-oriented development. Please refer to Chapter 2 of the I-405 Corridor Program Final EIS for a discussion of the Preferred Alternative and why it was advanced, as well as the other alternatives that were considered, the improvements and modal elements contained in each, their anticipated costs, and the reason for choice of the Preferred Alternative. In November 2001 the I-405 Corridor Program Executive Committee recommended support of use-based pricing in the region as part of an overall regional strategy. The feasibility of use-based pricing would need to be examined as part of a separate

Code Number			Name	Comment	Response
				The I-405 corridor will continue to grow, and by the time two GP lanes are added, the widened freeway would already have insufficient people-moving capacity. A wider I-405 would be obsolete before it is completed. We obviously need a multi-pronged approach to any such large problem as regional transportation. The study as it stands does not make sufficient reference to such creative, and yet proven concepts such as car sharing. A fleet of sharable low-emission cars (such as those available through Flexcar) could be placed at park and ride facilities to enable transit patrons to efficiently complete the final leg of their journey. Thus a commuter could drive to a regional transit hub, take regional transit for 20 miles, and then drive the last 5. To the extent that we make this sort of solution cheaper and faster than driving alone, it becomes a viable option for some. I do not favor doing nothing, by any stretch. I am a proponent of transit, though I acknowledge it won't work for everyone. Various truck climbing lanes and very selective capacity improvements could potentially play an incremental role in reducing congestion. But where are the detailed proscriptions for land use in the corridor? Where are the detailed analyses of congestion pricing? Apparently outside the scope of this study. Despite the large geographic area of this study, it does not contain a regional solution, and that is what we desperately need.	regional study. Also, please refer to the response to your comment E266.SOL-1 and comment E66.SOL-1. The proposed TDM strategy is flexible to adapt to new technologies and strategies. We will add the car sharing idea to the list of strategies to be evaluated in more detail prior to implementation.
E267	ALT	1	Bob Wicks bobw@kirklandchamber.org Agency: Greater Kirkland Chamber of Commerce	On behalf of the Board of Directors for the Kirkland Chamber of Commerce, I would like to express our support for the selection of Alternative 3 as Preferred Alternative of the I-405 Corridor Program. The DEIS clearly shows that Alternative 3 would be the best for our community, environmen t and quality of life. Thank you in advance for taking the time to hear our support.	Please see response to comment L12.ALT-1.
E268	ALT	1	Robert J. & Gretchen R. Dwinnell 16520-164th Ave. N E Woodinville, WA. 98072 bdwinnell1@home.com Agency: Public	As a daily commuter on I-405 between Woodinville and Bellevue and from Bellevue to I-90, it never ceases to amaze me how inefficient and 'under laned' I-405 has become. The HOV lane has helped, but we are in desparate need of additional lanes. I wholeheartedly support Alternative #3 as the Preliminary Preferred Alternative as the best alternative to help reduce traffic congestion. Please approve this process, it's time to move forward.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.

Code Number			Name	Comment	Response
E269	SOL	1	Keith Wilbur keith.r.wilbur@juno.com Agency: Public	I think the program should be completely replaced with an elevated 'monorail' project running down the center (median) of I-405 (an extension of the Seattle 'ETC' monorail project, only on the 'Eastside' of the lake). Additionally, I think the 'Sound Transit' light rail project should also be completely replaced with an elevated 'monorail'. In other words, I think both of these projects should be completely replaced with an elevated 'monorail' project running down the median of I-405 for the Eastside, an 'extension' of the Seattle ETC monorail project. It makes a lot more sense, removing 'surface congestion' using an elevated monorail transportation method, instead of adding to the already congested surface with more surface travel. Thank you.	Alternatives 1 and 2 included a rail transit system along the I-405 corridor, partially within the freeway and partially along railroad or arterial street right-of-way. This system could be a "monorail" technology. The Preferred Alternative consists of a bus rapid transit system using the existing and expanded HOV system in the corridor. For your information, the Elevated Transportation Company recently published estimated monorail construction costs in the City of Seattle. These costs ranged from $69 to $124 million per mile for a 14-mile elevated system. These costs were similar to the fixed-guideway transit system costs evaluated in Alternatives 1 and 2 in the Draft EIS. However, it was determined that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E270	ALT	1	Toby Bright 5012 S Holly St Seattle, WA 98118 tobyt77@yahoo.com Agency: Public	I have read the DEIS for the I-405 Corridor and have the following comments. I support Alternative 1 or the Sensible Solutions Alternative I oppose Alternatives 3, 4, and the preliminary preferred alternative that WSDOT announced in early 2001.	Please see response to comment E15.ALT-1.
E270	FATE	1	Toby Bright 5012 S Holly St Seattle, WA 98118 tobyt77@yahoo.com Agency: Public	I support salmon recovery, and was disappointed to see that the DEIS did not present a salmon recovery proposal. You should work harder on this.	The purpose of this EIS is to assess impacts and compare alternatives, rather than to present an overall proposal for salmon recovery. This being said, WSDOT's early-action mitigation strategies would be supportive of salmon recovery efforts in the region. Please also refer to response to comment L38.FATE-1.

Code Number			Name	Comment	Response
E270	TR	1	Toby Bright 5012 S Holly St Seattle, WA 98118 tobyt77@yahoo.com Agency: Public	Your assumptions about traffic changes are dubious. You should look at the example in California where vehicle miles traveled increased from significantly when areas increased new lane capacity (Hansen and Huang, 1997, "Road Supply and Traffic in California Urban Areas," Transportation Research A, 31(3) 205-218). This is consistent with experience when the new lanes on I-90 opened; traffic over the bridge increased, and there was no observable decrease in traffic elsewhere.	Please see the response to comment E66.SOL-1 related to induced travel. A substantial amount of diverted traffic has been accounted for in the travel forecasts. The oft-cited Hansen and Huang research concluded that the primary determinant of induced travel (i.e., increases in VMT) is population change (40 percent of effect), while the effects of added lane miles (i.e., capacity) account for less than 10 percent of the induced travel effect (Hansen, Figure 3, p. 216). Hansen's findings also only pertained to state highways, and did not include the effects on other arterials or local streets. We have not analyzed historical effects on the I-90 corridor in association with other roads within the region.
E270	COST	1	Toby Bright 5012 S Holly St Seattle, WA 98118 tobyt77@yahoo.com Agency: Public	The cost proposals are poorly described. You should show cash flows in current year dollars, and include any financing costs. This gives people a better lookat how the alternatives will require different cash outlays, and which alternatives are more or less prone to cost overruns due to construction delays. In a 1998 report, the General Accounting Office found that complex projects, including those using the "design-build" technique you are proposing, often end up costing far more and taking far longer than originally expected (GAO/RCED-98-64).	All costs are shown in year 2000 dollars. Funding has yet to be allocated to implement proposed projects. Therefore, it is premature to include financing costs. Not having dedicated funding also makes it difficult to predict when expenditures will occur. Thank you for your comments on potential cost overruns.
E270	O	1	Toby Bright 5012 S Holly St Seattle, WA 98118 tobyt77@yahoo.com Agency: Public	You should identify any mitigation sites that are within the planned construction area for any of the alternatives. You may have to do double mitigation.	Existing and proposed mitigation sites will be identified in greater detail during future project-level environmental analysis, documentation, and review.
E270	TR	2	Toby Bright 5012 S Holly St Seattle, WA 98118 tobyt77@yahoo.com Agency: Public	The DEIS relies on several models, but does not present the statistical support so a person can decide if the model is robust and the findings significant. You should present the basic statistics: F tests, adjusted R squared, and p-values for coefficients.	The DEIS and Transportation Expertise Report provide substantial data on traffic and person movement within the corridor. Travel forecasting procedures are indicators of future conditions, but do not lend themselves to the types of statistical tests that are suggested.

Code Number			Name	Comment	Response
E271	O	1	Tina Poepping tinap@highridge.com Agency: Public	I am curious if you ride the bus? I have had the full opportunity and experience of riding the bus as my only form of transporation for a year straight. If you have not had this experiecne, let me tell you a little about mine so that you can relate better to me as a citizen and a person with a valuable opinion. The idea and the novilty of doing something "good and pro active" for the environment and the congestion on the roads unfortunately didnt last long for me. After having to get up an hour earlier and get home an hour later....after having to stand int he rain to catch a late bus.....after having people spill coffee on me.....after having to guard my possesions (in fear of them being taken or sat on or touched).....after feeling likemy personal space was not my own.....I do admit I had a change ofheart. Call it selfish or self absorbed.....call it what you may. I enjoy the personal freedom of driving my own car. Making my own schedule Being able to run errands after work and getting home at a reasonable hour. I also enjoy eating in my car and the privacy it holds for personal phone calls. It gives me serenity and silence or the ability to enjoy my music if thats what my mood calls for. I also enjoy the fact that if I am bein touched in my own car its probably because I want to be. My point is that most people like to be comfortable at any cost. They like their freedom.....and their privacy. The reality is that most people feel that way and giving up that personal freedom would be like having to always use a public payphone for personal calls or a public bathroom, or even 4 strangers always next to you every time you sit down to a meal. So the question about widening the roads or encouraging people to use public transit really isnt a question at all. I think that the question is are we going to move up to the #1 spot on the Worst Traffic in America Survey.	Thank you for your comment.
E271	SOL	1	Tina Poepping tinap@highridge.com Agency: Public	Obviously, I am in full support of improving the roads in our communities. Please consider this to the fullest extent.	Thank you for your comment.

Code Number			Name	Comment	Response
E272	ALT	1	Phil Hunter phunter@united-moving.com Agency: Public	We are in the transportation industry, primarily in Household Goods, and the improvement of the traffic flow in the Puget Sound Basin, if of vital importance to our survival. Traffic congestion is very costly to everyone involved in transportation, and even slight improvements can pay great dividends both to our company and the State as a whole. The improved traffic flow on I-405 would be a major first step in increasing productivity, and eliminating wasted time sitting in snarled traffic, wasting time, money and fuel. I am strongly urging your support of Alternative 3 as the most cost effective solution for reducing congestion and improving the flow of traffic on I-405.	Please see response to comment L12.ALT-1.
E273	ALT	1	Aaron Swain aarons@kapplerhomeplans.com Agency: Public	I personally support the idea of a progressive solution to the traffic congestion problem. Additional lanes on the freeway are not going to solve the source problem: the amount of traffic on the road. I support Alternative 1. I have been to cities with functional, well thought-out transit systems, and they are the most heavily used form of transportation. Granted, they are expensive, but the long term result is an improvement in quality of life. Alternative 3 produces a simple and satisfactory short-term solution, but how long will it last, until more lanes of traffic are again needed? What we need to do is make it a hassle to use the freeway, AND offer a better alternative. We've accomplished the first half of the equation, now it's time to implement the second half. That is my personal opinion of what should be done about I-405.	Alternative 3 - Mixed Mode Emphasis, would implement a high-capacity transit system throughout the study area using bus rapid transit (BRT). Chapter 2 of the I-405 Corridor Program Draft EIS provides a description of this and other alternatives.
E274	ALT	1	Maria Lange Maria@FirstWellington.com Agency: Public	The time has come for us to get moving again! I am concerned about and want assurance of our region's economic vitality and sound quality of life in our neighborhoods. The constant traffic gridlock on Interstate 405 severely challenges these goals. It is essential to the future of our region that a solution be adopted and executed in a timely manner. For those of us who live, work and travel on the Eastside, we know I-405 is the backbone of our economy. Right now, not only does it not adequately meet our transportation needs, but the daily gridlock is a constant challenge which wreaks havoc on our daily lives.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.

Code Number			Name	Comment	Response
				Washington State Department of Transportation, local elected officials, transportation experts, and citizens have spent the last two years developing and analyzing possible solutions to the traffic headache on I-405. Out of four different solution packages this group studied, Alternative 3, known as the Preliminary Preferred Alternative, was identified as the most cost-effective solution that will accomplish the goals of reducing traffic congestion and improving mobility on the I-405 corridor. I strongly support Alternative 3. Please! Let's get moving again!	
E275	ALT	1	John Kappler, johnk@kapplerhomeplans.com Agency: Public	I'm writing to you to express my support for "Alternative 3": expansion of Interstate 405. As a small business operator on the eastside, I am constantly reminded of the importance the I-405 corridor plays in our economy. The efficiency with which traffic moves along the corridor is equivalent with the productivity of our eastside businesses; it is vital to our economic success. For that reason, I support the addition of two lanes of traffic in each direction, additions for HOV efficiency, and the modifications to those junctions where "bottlenecks" occur.	Please see response to comment L12.ALT-1.
E276	SOL	1	Mike Miller mmiller@masterbrandcabinets.com Agency: Public	I am an active associate member of the Seattle Master Builders Association and have been a professional in the building industry in the Puget Sound region for the past 19 years. I have seen this region change and grow in many ways. One of the most drastic changes has been the increased traffic congestion we all experience. Today, this issue heads the list of most citizens as the most important and critical to our future growth and strength. I strongly support the Preliminary Preferred Alternative recommended by "Move on 405". We need a clear plan to responsible solutions to this problem. This is the most important issue to me, my family, my business and future.	Thank you for your comment.
E277	ALT	1	Dwayne Kohler 6028 1st Ave NW Seattle, Wa 98107 KArchiPlan@aol.com Agency: Public	I am writing in support of the "Preliminary Preferred Alternative (Alt #3) for the improvement of the I 405 corridor. It is appropriate to balance ourtraffic facilities including the addition of general traffic lanes. Adding new lanes, increasing HOV utilization by transit, and eliminating bottlenecks is important to do now. The cost of lost time and money for continued delay is increased by inaction. You have a good solution in Alt #3. Please take your mission statement seriously and provide vehicle capacity. Thank you	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.

Code Number			Name	Comment	Response
E278	ALT	1	Don Millard DonMillard@belred.com Agency: Public	Just a quick comment to lend my support to Alt #3 to maintain expansion on I-405	Please see response to comment L12.ALT-1.
E279	ALT	1	Greg Krabbe gkrabbe@TriadAssoc.com Agency: Public	I am writing to encourage you to move forward with Preliminary Preferred Alternative (Alt. #3), which I understand includes the following: Adding two new general traffic lanes each direction to I-405 Fixing bottlenecks such as the SR 167/I-405 interchange Developing an expanded express and local bus system focused on the HOV lanes along I-405 Widening a portion of SR 167 from Renton to Kent As a daily commuter between Everett and Kirkland, I know first hand that the level of service of this roadway is often at LOS F (it took me 1 and 1/2 hours to get to work today! 10/24/01). I have heard the arguments from those that oppose this program, and while well rehearsed and presented, they are extremely biased and rely entirely on the assumption that people will radically change their transportation habits in order to adjust to insufficient highway capacity. Observations of other parts of the country, Los Angeles, the Bay Area and Houston for example, do not bear this assumption out. I know that many people would like to see less cars and less people in the area, and the idea of a "progressive solution" that does not include massive spending on new highways is sure to be popular with the uninformed, but I do not believe there is a realistic alternative to expanding our highway systems in order to solve the mounting traffic problems in the region. Everyone opposes growth until it affects their economic position. Continued growth in the Seattle Metropolitan Area is ultimately in everyone's best interest and you can be sure it will continue. Our roads and infrastructure must be updated to meet the needs of this community. Engaging in an experiment that relies on a fundamental shift in social behavior at the heart of our urban transportation system is not appropriate. I urge you to move forward with the Preliminary Preferred Alternative (Alt. #3) for I-405.	Please refer to the response to comment L-6, ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. With Alternative 3, LOS will be improved during most time periods compared with existing conditions.

Code Number			Name	Comment	Response
E280	ALT	1	Janette Cunningham 14315 103rd Ave. NE Bothell, WA 98011 jcgamwa@home.com Agency: Public	As a person who travels the I-405 corridor almost daily I don't feel Washington State Department of Transportation's "Alternative 3" plan for I-405, which calls for the construction of four new lanes and the widening of neighborhood streets over 18 years, is the answer to the traffic problems. Not only have independent studies shown that reliance on new lanes creates more traffic, Washington cannot afford the $8 billion price tag. In addition, "Alternative 3" threatens our quality of life. It will harm neighborhoods (one of which I happen to live in, by boosting traffic on local streets, increasing noise, air and water pollution and worsening sprawl.	Please refer to the response to comment E66.SOL-1.
E280	SOL	1	Janette Cunningham 14315 103rd Ave. NE Bothell, WA 98011 jcgamwa@home.com Agency: Public	I urge you to please analyze "Alternative 5" as proposed by Sensible Solutions for 405. This plan will produce traffic improvements in half the time and at half the cost of "Alternative 3" by focusing on strategic road improvements, an aggressive trip reduction program and significantly increasing the number of buses, vanpools and park & rides. Thank you for your consideration.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E281	ALT	1	Todd R. Woosley 10633 S.E. 20th Street Bellevue, WA 98004 todd@woosleyproperties.com Agency: Public	I would like to communicate my strong support for the Preliminary Preferred Alternative (Alt. #3) of the I-405 Corridor Program's D.E.I.S.. My home is located within one half mile from I-405. Expansion of the roadway (especially the additional general purpose lanes) would improve my quality of life by get cut through traffic off my neighborhood streets and back on the highway where it belongs (and would rather be, if I-405 wasn't so congested). The Preliminary Preferred Alternative best addresses the D.E.I.S.'s stated goal and purpose of reducing congestion and improving mobility. Alternative #3 would be the most cost effective per passenger trip of all the options. It is a worthwhile investment. Alternative #3 would also have the least environmental impact per passenger trip accommodated of any of the alternatives.	Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.

Code Number			Name	Comment	Response
				Finally, the direct and indirect costs of the current congestion on I-405 severely impact my economic well being. Reducing congestion and improving mobility on I-405 is critical to my financial success. The Texas Transportation Institute reports that congestion on I-405 costs every man, woman and child utilizing the corridor $930 PER YEAR! My business and personal needs dictate that I use the I-405 corridor more than average. It's reasonable to assume the Preliminary Preferred Alternative would help mitigate the enormous costs of congestion I'm now forced to bear. I would much rather invest this money in improved infrastructure than waste it stuck in traffic. Improved neighborhood safety, quality of life, economic and financialwell-being through reduced congestion and improved mobility are many of the reasons I support the Preliminary Preferred Alternative. The best possible improvement to the alternative would be to add even more general purpose capacity and a hill climb lane, particularly south of I-90.	
E282	PPA	1	Larry Ehl 8011 180th Place SW Edmonds, WA 98026 LarryE@fsci.com Agency: Public	As a resident of Edmonds I am a frequent "consumer" of I-405. I support the Preliminary Preferred Alternative. It appears to me to be the most balanced, cost-effective, and congestion-reducing solution. Reducing congestion will occur only through a combination of added general purpose capacity AND added transit options. Failure to add general purpose capacity equals failure to reduce congestion. Focusing nearly exclusively on high capacity transit and demand management will fail to reduce congestion because it cannot possibly accommodate the geography and breadth of trip needs of households in a cost-effective and convenient manner	Please see response to comment E29.PPA-1.
E283	ALT	1	Jerry Dinndorf JDinndorf@agcwa.com Agency: The Associated General Contractors of Washington	The Associated General Contractors of Washington supports transportation improvements that meet clearly defined priorities, focus on congestion points, add capacity, and accommodate effective public transportation such as buses and carpools. Of the three alternatives presented in the I-405 Corridor Study, Alternative # 3, the Preliminary Preferred Alternative best meets AGC objectives. Alternative #3 takes a balanced approach and makes improvements	As discussed in Chapter 2 of the I-405 Corridor Program Draft EIS, the No Action Alternative and four action alternatives were advanced for detailed study. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.

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				in all modes as well as supporting improvements to the connecting arterial system. At the same time it is an environmentally responsible solution that corrects a number of existing environmental problems. Improvements in the 405 corridor are absolutely essential to maintain the economic vitality and environmental quality of the region. The sooner the region moves forward with the preferred alternative the sooner we can begin to reap the benefits of the improvements.	The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E284	SOL	1	Kate Baldwin kate@katebaldwinphotography.com Agency: Public	WHATEVER HAPPENED TO THE LIGHT RAIL THAT WAS SUPPOSED TO CONNECT ALL OF THE GREATER SEATTLE AREA??? IF LIGHT RAIL IS TRULY USABLE TO COMMUTERS, AND MADE SO READILY AVAILABLE THAT IT IS CHEAPER TO USE THAN DRIVING A CAR, PEOPLE WILL USE IT!!!!!!!! WE SHOULD ALSO LOOK INTO EXPANDING LANES IN EXISTING HIGH TRAFFIC AREAS. BUT ADDING MORE BUSSES ALONE WILL NOT ENCOURAGE PEOPLE TO USE MASS TRANSIT. PEOPLE NEED TO HAVE AN OPTION THAT WILL BE BETTER THAN THE GRID LOCK THAT BOTH CARS AND BUSSES SIT IN. THEY NEED LIGHT RAIL/SUBWAYS.	Alternatives 1 and 2 included a rail transit system along the I-405 corridor, partially within the freeway and partially along the railroad or arterial street right-of-way. The Preferred Alternative includes a bus rapid transit system using the existing and expanded HOV system in the corridor. These buses will have fast and reliable travel similar to that of a rail system. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E285	ALT	1	Sue Scott SScott9974@aol.com Agency: Public	I want to voice my support of Alternative 3 for the I405 solution. It is time that we get moving on this. Any further delays will only add to the mess that exists. We entrusted a knowledgeable group of citizens to study the situation. It is a slap in the face to not go forward with their recommendations. To consider other viewpoints at this time is too late. Let's just get going and get I405 moving again!	Please see response to comment L12.ALT-1.
E286	ALT	1	Skip Rowley Skip@rowleyent.com Agency: Public	I am writing in support of alternative # 3, as outlined in the various proposals for I-405. It is imperative that we provide the basic infrastructure for the Eastside, for general capacity as well as transit and carpools. The Eastside is growing without the grid system that Seattle has, without the transit system Seattle has and without the lanes that Seattle has to handle general capacity. We need to build it and build it now. The Eastside is long overdue for those improvements.	Please see response to comment L12.ALT-1.
E287	O	1	Norman Hansen, 3851 136th Ave. NE, Bellevue, 98005. Agency: Bridle Trails Community Club	Our comments are specifically focused on the program from approximately 520 to NE 85th in our geographic area and east of 405 to 148th.	Thank you for your comment.

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E287	ALT	1	Norman Hansen, 3851 136th Ave. NE, Bellevue, 98005. Agency: Bridle Trails Community Club	Alternative Solutions - Bridle Trails Community Club has no specific endorsement for any of the alternatives. Members are submitting their personal recommendations individually. Bridle Trails residents are primarily concerned with impacts and mitigation in the following areas of the EIS:	See additional responses to your comment below.
E287	AQ	1	Norman Hansen, 3851 136th Ave. NE, Bellevue, 98005. Agency: Bridle Trails Community Club	Air Quality - Achieve air quality to meet desired standards especially in the immediate vicinity.	Analysis of the effects of the alternatives on regional air quality presented in the EIS show that regional emissions of pollutants in 2020 under each of the alternatives would be less than under the No Action Alternative and would be below the regional emission budget; therefore, no exceedances of air quality standards are expected.
E287	N	1	Norman Hansen, 3851 136th Ave. NE, Bellevue, 98005. Agency: Bridle Trails Community Club	Noise - Effective mitigation is needed to meet noise standards for the expected increase in noise on both sides of the Project. Especially, in the area east of I405 which is significantly uphill to the Pikes Peak Neighborhood.	Traffic noise in the I-405 corridor will increase in the future under all of the alternatives, including No Action. Even if the maximum noise levels do not increase, the number of hours per day with high traffic volumes will increase. At this program stage, the potential for noise increases under each of the alternatives has been evaluated. Noise impacts at specific locations along the corridor, along with mitigation measures such as noise walls (noise reduction) will be evaluated as detailed project designs are developed for specific corridor transportation improvements. One of the goals of the I-405 Corridor Program is to reduce congestion and associated impacts on the local arterial network. The capacity expansions on I-405 contained in the Preferred Alternative would shift some traffic back to I-405 from the arterials.
E287	TR	1	Norman Hansen, 3851 136th Ave. NE, Bellevue, 98005. Agency: Bridle Trails Community Club	Transportation - Bridle Trails Community has great concern for the impact of regional traffic to and from I405 utilizing neighborhood streets such as 116th, Northup, NE 24th, 132nnNE/134th NE and 140th Ave. NE. Effective mitigation is needed so as not to impact our local streets. Our Bellevue Comprehensive Plan BT-23 states "Discourage the use of Bridle Trails arterials by regional/commuter traffic and discourage non-local traffic use of residential streets"	With the action alternatives on I-405, traffic volumes are forecasted to decrease on many north-south arterial streets, such as those through Bridle Trails.
E287	LU	1	Norman Hansen, 3851 136th Ave. NE, Bellevue, 98005. Agency: Bridle Trails Community Club	Land Use - Require mitigation to protect the adjacent land use of R1 zoning (35,000 Square feet lot size)	The majority of the impacts of I-405 widening, in the conceptual design phase, appear to be contained within the existing WSDOT right-of-way. The final engineering design will minimize right-of-way acquisition to the greatest extent possible.

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E287	ROW	1	Norman Hansen, 3851 136th Ave. NE, Bellevue, 98005. Agency: Bridle Trails Community Club	Displacement and Right Of Way - Mitigate right of way area to protect the R1(one house per 35,000 square feet land use designation). We are concerned how 4 lanes can be added without encroaching on existing streets (115th Ave. NE and 116th Ave. NE)	If a proposed acquisition results in the lot becoming nonconforming with existing zoning and/or zoning exceptions are not available, the entire lot could be acquired at appraised fair market value. Also, refer to response to E261.ROW-1.
E287	EJ	1	Norman Hansen, 3851 136th Ave. NE, Bellevue, 98005. Agency: Bridle Trails Community Club	Environmental Justice - Effective mitigation to meet our Bellevue and Kirkland Comprehensive Plan objectives for our Bridle Trails area. We believe that a lid over the traffic lanes in our area is required to maintain our quality of life.	Presidential Executive Order (EO) 12898 and Federal Highway Administration (FHWA) Order 6640.23 establish that it is Federal policy to avoid to the extent practicable disproportionately high and adverse human health or environmental impacts on the minority or low-income population. For purposes of the environmental justice analysis conducted for the I-405 Corridor Program DEIS, substantial adverse impacts were considered synonymous with high and adverse impacts as described in EO 12898 and FHWA Order 6640.23. As reported in the other expertise reports prepared for the I-405 Corridor Program, at the level of analysis performed, no substantial adverse impacts are expected as a result of this project. Consequently none of the impacts of this project can be described as having a high and adverse impact in the context of EO 12898 or FHWA Order 6640.23. As there are no high and adverse impacts expected as a result of this project, the analysis therefore concluded that no high and adverse human health or environmental effects of the project are expected to fall disproportionately on minority or low-income populations. The project was therefore considered to be consistent with the policy established in EO 12898 and FHWA Order 6640.23.
E287	SOL	1	Norman Hansen, 3851 136th Ave. NE, Bellevue, 98005. Agency: Bridle Trails Community Club	I405/520 Intersection - Include provisions for expansion of 520 in the I405 design. Particularly where I405 and 520 intersect. Include provisions for the current bike trail to extend west along 520 through the 405/520 intersection.	Proposed improvements to the I-405/SR 520 interchange are being coordinated between the I-405 Corridor Program and the Trans-Lake Washington Project. Thank you for your suggestion regarding extension of the bicycle trail.
E287	O	2	Norman Hansen, 3851 136th Ave. NE, Bellevue, 98005. Agency: Bridle Trails Community Club	The Bridle Trails Community is willing to meet on the above items to provide additional information and ensure that the mitigation determined meets our needs and the above requirements. We suggest a meeting in mid November to begin these discussions. Please advise.	Your comment is acknowledged.

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E288	ALT	1	Paea Radford 10423 Main Street, #4 Bellevue, WA 98004 paea@radfordrealtors.com Agency: Public	I'd just like to voice my support for alternative 3. I know this may be late but if there's anyway to take this into consideration it would be greatly aprreciated. I want to express my appreciation of all those invovled and who have worked so hard in putting together this proposal. I think that alternative 3 is the most accomodating to all sides. It will have a significantly positive impact improving our transportation situation, the environmental, and the ability for businesses to work in this area. I apologize for my tardy response.	Please see response to comment L12.ALT-3.
E289	TR	1	Robert Abeyta listwithme4sale@home.com Agency: Public	I am a native of Seattle, I was born and raised here and through out the years have certainly driven all over the region and watched traffic get worse and worse. The powers that be have added more lanes to every major freeway and still the traffic is backed up and congested most every morning and evening and not much better mid-day. The Dot. spent much time and millions of dollars to straighten out the "S" curves on I-405 and still it has bumper to bumper stop and go traffic most of the time. People are tired of more lanes, as soon as they are done, the are full.	Please refer to the response to comment E66.SOL-1.
E289	COST	1	Robert Abeyta listwithme4sale@home.com Agency: Public	Now I am sure that with these new proposals that we the tax payers are going to be asked to fund Billions of dollars for more roads (lanes) and I am sure more busses.	Funding will come from federal, state, and local agencies. There is a good possibility that the public will be asked to vote on whether to fund portions of the I-405 Corridor Program.
E289	TR	2	Robert Abeyta listwithme4sale@home.com Agency: Public	This is only for I-405, what about this light rail that sound transit wants to build. Starting one mile from SeaTac Airport, going down into Rainier valley and running into the city. All that does is replace a bus route or two. A train from nowhere going where nobody would choose to go. The people who thought of that one should be tarred and feathered, but of course who cares if we ever get anyone out of there cars onto rapid transit (how fast will this train go anyway?) just as long as we get that $500,000,000 from the Feds.	Thank you for your comments regarding Sound Transit. These issues are outside of the purview of the I-405 Corridor Program.
E289	SOL	1	Robert Abeyta listwithme4sale@home.com Agency: Public	We are going to be so far behind the rest of the country and so extremely congested and even our surface streets will be all clogged up, unless we scrap all of these fix-it Band-Aids and come up with a high speed people mover that will run on I-405 and I-5 and will cross the lake and go out to Tacoma and north to Everet, and will	Alternatives 1 and 2 include a fixed-guideway high-capacity transit (HCT) within the I-405 corridor, partially within the freeway and partially along the railroad or arterial street right-of-way. However, it was determined that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its

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				not be out moded when its finished. Look to Vancouver and its Sky train which serves the whole area in and around Vancouver. Look at the bay area and the famous Bart. system. You can even look at the City of Denver and see that it is going to build a monorail system that will run around Denver and even out to the ski areas.(this monorail is cheaper that more lanes, imagine that) people can stay in Denver hotels and take the monorail into the mountains and ski all day and then take a high speed train back into the city to relax. I for one would be more than willing to pay my share of an even bigger tax to raise billions to build, if the powers that be would build a high-speed people mover that serves the entire region. NOW THAT WOULD CERTAINLY GET PEOPLE OUT OF THEIR CARS AND OFF THE ROAD TO COMMUTE TO THEIR JOBS. AND MAYBE IT COULD GO OUT TO THE AIRPORT TOO (not stop a mile away) Lets think about a state of the art people mover, not more lanes or god forbid, some darn light rail choo choo train. Come on folks I know you can come up with a real plan that works. This is not rocket science.	inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. The Preferred Alternative consists of a bus rapid transit system using the existing and expanded HOV system in the corridor. These buses will have fast and reliable travel similar to that of a rail system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E290	SOL	1	Sharon McWillis 10815 NE 154th Court Bothell, Washington 98011 mcwis@perkinscoie.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl. I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.
E290	SOL	2	Sharon McWillis 10815 NE 154th Court Bothell, Washington 98011 mcwis@perkinscoie.com Agency: Public	I work downtown in Seattle, and because I am a professional, I work long hours, however, the bus schedule between downtown and the eastside is not convenient, the bus schedule does not work for me. I would ride the bus, if there were more buses, with a more frequent schedule. Additionally, a light rail is the real solution to the traffic problem in the Puget Sound.	Thank you for your comment.

Code Number			Name	Comment	Response
E290	N	1	Sharon McWillis 10815 NE 154th Court Bothell, Washington 98011 mcwis@perkinscoie.com Agency: Public	The alternative to build more lanes on I-405 is not the answer, in fact, I now call the noise level where I live the "405 ROAR", which it is. At the cost of homes in the Bothell/Kirkland/Bellevue area, we deserve something different than noise and air pollution.	Traffic noise in the I-405 corridor will increase in the future under all of the alternatives, including No Action. Even if the maximum noise levels do not increase, the number of hours per day with high traffic volumes will increase. At this program stage, the potential for noise increases under each of the alternatives has been evaluated. Noise impacts at specific locations along the corridor, along with mitigation measures such as noise walls (noise reduction) will be evaluated as detailed project designs are developed for specific corridor transportation improvements. One of the goals of the I-405 Corridor Program is to reduce congestion and associated impacts on the local arterial network. The capacity expansions on I-405 contained in the Preferred Alternative would shift some traffic back to I-405 from the arterials.
E290	AQ	1	Sharon McWillis 10815 NE 154th Court Bothell, Washington 98011 mcwis@perkinscoie.com Agency: Public	I moved to the Puget Sound 6 years ago, and the air quality has increasingly worsened.	Over the past ten years, air quality has improved in the Puget Sound region as a result of cleaner automobiles and improved regulation of industrial sources. This can be seen in pollutant trends graphs in Section 3.23 of the EIS.
E290	LU	1	Sharon McWillis 10815 NE 154th Court Bothell, Washington 98011 mcwis@perkinscoie.com Agency: Public	I moved here, because I believe the Northwest was an environmental area I wanted to live in. But the greed in the Northwest is changing the environment. We need moratoriums on commerical and high-density residence building in that area, along with a sound, solid resolution to fix the traffic problem, not a temporary fix.	Please see response to comment L27.LU-1.
E290	SOL	3	Sharon McWillis 10815 NE 154th Court Bothell, Washington 98011 mcwis@perkinscoie.com Agency: Public	I believe that if you increase the lanes on I-405, you will see people leaving Seattle, as did Boeing, to find a better place to live. The Puget Sound is becoming an undesirable place to live, because of our traffic problem. Send a strong message to legistature that no other solution, other than a light rail will work. The cost will only get worse, and we have to act now.	Thank you for your comment.

Code Number			Name	Comment	Response
E291	SOL	1	Mary Rausch 15201 Admiralty Way C-7 Lynnwood, Washington 98037 mrausch@ch2m.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We can do a lot more with $8 million than just widen one interstate highway. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl. Please look at Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will is faster to implement, cheaper, and much more friendly to the environment.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.
E292	SOL	1	Dona Peterson 17527 S.E. 228 Kent, Washington 98042 sumthingelse@qwest.net Agency: Public	Please understand that I commute using 405 almost everyday during rush hour traffic. I know how bad it is, but WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl. I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more bike lanes, buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.
E293	SOL	1	Bronwyn Scott 524 172nd Place NE Bellevue, Washington 98008 bscott@nwlink.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl. I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.

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E293	SOL	2	Bronwyn Scott 524 172nd Place NE Bellevue, Washington 98008 bscott@nwlink.com Agency: Public	I also encourage you to think about charging people the real cost of gas, and to stop subsidizing the oil and gas industry. This is just encouraging people to believe that driving cars is a low cost solution, when it's really very, very costly both to the pocket book and to our environment. We need to start supporting communities and lifestyles that do not need to use so much gas. We need to start encouraging people to drive more efficient cars. We need to start requiring the auto industry to supply them and stop thinking always of performance.	Your suggestions regarding the cost of gas, the oil and gas industry, support for specific communities and lifestyles, use of more efficient cars, and the auto industry are potential regional, state, or national solutions that are outside the scope of the I-405 Corridor Program EIS.
E294	SOL	1	Dwight Rousu 13814 NE 70th Place Redmond, Washington 98052 rousu@gte.net Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl. I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.
E294	SOL	2	Dwight Rousu 13814 NE 70th Place Redmond, Washington 98052 rousu@gte.net Agency: Public	Also, formalize a system to arrange job swaps between people commuting opposite directions, to reduce travel.	This concept, known as proximate commuting, is included as an element within the I-405 TDM strategy that was common to all action alternatives and the Preferred Alternative.
E295				There is no correspondence numbered E295. This gap in the comments sequence is the result of a coding error.	

Code Number			Name	Comment	Response
E296	TR	1	Steve Scott 16737 235th Ave SE Issaquah, Washington 98027 steve_monicascott@compuserve.com Agency: Public	WSDOT's Alternative 3 is a poor choice for I-405. This plan has at least four fatal flaws: 1) It won't relieve congestion. Studies have indicated that if I-405 were widened to 12 lanes the average speed by 2020 would still only be 25 mph. Take a look at Atlanta's failed effort to build its way out of congestion; Kemper Freeman is wrong in his supposition that this is a solution. Eighteen years of construction backups will immediately double or triple congestion during the project, not to mention tearing out all or most of the improvements now underway. For example, I consider it ludicrous to rip out the SE 4th overpass in Bellevue after only 12 years of service.	The DEIS supports the conclusion that under Alternatives 3 and 4, congestion on I-405 will be improved compared with existing conditions. There would still be congestion during portions of the peak period, but the number of hours of congestion would be reduced. The comment regarding construction impacts are duly noted and will be considered during the detailed project evaluation.
E296	COST	1	Steve Scott 16737 235th Ave SE Issaquah, Washington 98027 steve_monicascott@compuserve.com Agency: Public	2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic.	Corridor projects of similar magnitude and benefit are being funded elsewhere in the United States. Voters within the Puget Sound region supported Sound Move, a $4 billion project to provide light rail, commuter rail, and express bus.
E296	ROW	1	Steve Scott 16737 235th Ave SE Issaquah, Washington 98027 steve_monicascott@compuserve.com Agency: Public	3) Alternative 3 will destroy adjacent neighborhoods and harm others by increasing traffic on local streets.	There will be mitigation, to the extent feasible and practicable, for the impacts of increased traffic on local streets. The magnitude of localized right-of-way impacts will not be known until such time as project alignments are chosen and the projects have been designed. Also, please refer to responses to comments E261.ROW-1 and E66.SOL-1.
E296	AQ	1	Steve Scott 16737 235th Ave SE Issaquah, Washington 98027 steve_monicascott@compuserve.com Agency: Public	4) This design will increase noise, air and water pollution and worsen sprawl. How can we possibly afford to accommodate more traffic when we teeter on the brink of losing federal funding due to air pollution levels over federal limits? Add the particulates predicted from proposed gas turbine generation facilities and we will not only lose the views we prize but kill our children and elderly with respiratory problems.	Analysis of the effects of the action alternatives on regional air quality presented in the EIS show that regional emissions of pollutants in 2020 under each of the action alternatives would be less than under the No Action Alternative and would be below the regional emission budget; therefore, no exceedances of air quality standards are expected.

Code Number			Name	Comment	Response
E296	SOL	1	Steve Scott 16737 235th Ave SE Issaquah, Washington 98027 steve_monicascott@compuserve.com Agency: Public	I urge the committee to analyze Alternative 5 as proposed by Sensible Solutions for 405. Take a quick look at what Salt Lake City has done to remedy the transportation deficiencies in that city. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides. As an added consideration, support for the Freeway Monorail proposal would make sense to augment Alt 5.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E297	AQ	1	Kris Durgin 19223 SE 46th PL Issaquah, Washington 98027 krisdu@hotmail.com Agency: Public	I live in Bellevue, WA very close to I-405. Please do not go forward with Alternative 3! Think about the pollution that already obscures Mt Rainier on a sunny summer day. This is just going to get worse if we keep building roads and encouraging people to drive! Please, take some responsibility for the environment that we all share.	Refer to the response to comment E296.AQ-1.
E297	SOL	1	Kris Durgin 19223 SE 46th PL Issaquah, Washington 98027 krisdu@hotmail.com Agency: Public	We need more public trasportation in the region. We should be spending money on encouraging people NOT to drive! Why not spend $8 billion on improving public transportation, a proven method of reducing traffic jams and reducing pollution, rather than expanding the roads, which just creates more traffic?	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3 - Mixed Mode Emphasis. Please refer to the response to comment E66.SOL-1.
E297	ALT	1	Kris Durgin 19223 SE 46th PL Issaquah, Washington 98027 krisdu@hotmail.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E297	SOL	3	Kris Durgin 19223 SE 46th PL Issaquah, Washington 98027 krisdu@hotmail.com Agency: Public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E298	ALT	1	Paul T 12962 SE 23rd Street Bellevue, Washington 98005 wordthispault@juno.com Agency: Public	WSDOT's Alternative 3 for I-405 is not the answer.	Please see response to comment E255.ALT-1.
E298	SOL	1	Paul T 12962 SE 23rd Street Bellevue, Washington 98005 wordthispault@juno.com Agency: Public	The answer is you. what if the wsdot did not put up options and instead announced its decision, each person individually decides, to embark on a new road full of new paths and new thought patterns. To ride my bike to work and instead of going to the gym three times a week go twice. As uncomfortable and awkward it may be to carpool with someone, someone you don't even know and do it because it is the right thing to do. Not because I will get gas money, not because I have to, but because I want to. It feels good to do good things and builds me good self esteem. What if everybody at wsdot did this and set an example of such stature? Imagine the possible outcomes. In God we trust.	Thank you for your comment.
E299	ALT	1	Dana Michaels 7356 Marani Way Sacramento, California 95831 danamichaels@netscape.net Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E299	SOL	1	Dana Michaels 7356 Marani Way Sacramento, California 95831 danamichaels@netscape.net Agency: Public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E299	SOL	2	Dana Michaels 7356 Marani Way Sacramento, California 95831 danamichaels@netscape.net Agency: Public	Better yet, stop the rampant development that has ruined southern California! We DO NOT have to accept and accommodate uncontrolled population growth (more an explosion, really!). It just takes LEADERSHIP from elected officials who have the guts to encourage SMALLER families, and let people know that it's OK to NOT have kids, if one doesn't really want to. If you REALLY want to solve the problems of traffic congestion, air pollution, overcrowded classrooms, and energy and water shortages, JUST SAY "NO" TO DEVELOPERS!	Your suggestion regarding family planning is outside the scope of the I-405 Corridor Program EIS.
E300	ALT	1	Claudio Parazzoli 20445 1st Ave S Seattle, Washington 98198 parazzolic@aol.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl. 5) I f you have any doubt that it will not work, just look south to L.A.. If just building more roads it is the answer, the traffic in L.A. would just be wonderfull. In reality it sucks... Pleas elearn from other people mistakes and do not be completly owned by the construction lobby!	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E300	SOL	1	Claudio Parazzoli 20445 1st Ave S Seattle, Washington 98198 parazzolic@aol.com Agency: Public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.
E300	O	1	Claudio Parazzoli 20445 1st Ave S Seattle, Washington 98198 parazzolic@aol.com Agency: Public	Remember that persistent disregard of the public desires may lead to treacherous consequences to public bodies.	Thank you for your comment.
E301	ALT	1	John Bates 1617 48th Avenue San Francisco, California 94122 actionnetwork@johnbates.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E301	SOL	1	John Bates 1617 48th Avenue San Francisco, California 94122 actionnetwork@johnbates.com Agency: Public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E301	O	1	John Bates 1617 48th Avenue San Francisco, California 94122 actionnetwork@johnbates.com Agency: Public	Although I currently reside in San Francisco I do a lot of business in LA and did live in Santa Monica for over 14 years. I really do feel strongly that all of CA needs to move more towards Alternative 5 style solutions! Thank you! JB	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. As discussed in Section 1.4 and Section 2.1 of the I-405 Corridor Program Draft EIS, the portion of the I-405 Corridor that is the subject of this EIS is located entirely with the central Puget Sound region of Washington. The proposed improvements are not expected to have any effect on California. Also, please refer to the response to comment E66.SOL-1.
E302	ALT	1	Stephanie Bokor 23715 202nd Ave. SE Maple Valley, Washington 98038 ssbokor@yahoo.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E302	SOL	1	Stephanie Bokor 23715 202nd Ave. SE Maple Valley, Washington 98038 ssbokor@yahoo.com Agency: Public	I urge you to work on getting the "Sounder Train" up and running more trains. I have ridden this train and believe that it will help lessen the traffic on our roads. DO NOT made wider highways -- get more public transportation that works! More trains means less automobiles on the road. Let's not cut any more trees down to make way for cars. USE THE RAIL SYSTEM!!	Thank you for your comments regarding Sound Transit. These issues are outside of the purview of the I-405 Corridor Program. Please refer to E66.SOL-1.
E303	SOL	1	Teresa Hopkins 1826 1st St Kirkland, Washington 98033 thop@gte.net Agency: Public	I live within 5 miles of I-405, in Kirkland, and I use this freeway almost every day. Sure it's congested. That's what we get with roads between waterways, too many people, and, especially, a lack of planning that should have started decades ago. But I don't want more pavement! It doesn't have to be that way! When I think of Europe--I can just pick any city off the map--transiting around those cities is just more pleasant--in very densely populated areas! I want to save our communities, do better for the environment, and improve transportation--all at the same time. We need better mass transit.	Alternative 1 - HCT/TDM Emphasis, and Alternative 2 - Mixed Mode with HCT/Transit Emphasis, both include a physically separated, fixed-guideway high-capacity transit system potentially using some form of rail technology within portions of the BNSF right-of-way. Alternative 3 - Mixed Mode Emphasis, would implement a high-capacity transit system throughout the study area using bus rapid transit (BRT). In addition, all action alternatives include an increase in transit service ranging from 50 percent up to 100 percent. Please note that Alternative 1 would not meet the adopted purpose and

Code Number			Name	Comment	Response
					need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E303	ALT	1	Teresa Hopkins 1826 1st St Kirkland, Washington 98033 thop@gte.net Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E303	SOL	2	Teresa Hopkins 1826 1st St Kirkland, Washington 98033 thop@gte.net Agency: Public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E304	ALT	1	Thomas Hager 10403 NE 198th St Bothell, Washington 98011 tomterrific3@juno.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws: 1) Independent studies show that reliance on new lanes creates more traffic, 2) the $8 billion price tag will require tax increases that are not realistic, 3) alternative 3 will harm neighborhoods by increasing traffic on local streets and 4) It will increase noise, air and water pollution and add to sprawl.	Please refer to the response to comment E66.SOL-1.
E304	SOL	1	Thomas Hager 10403 NE 198th St Bothell, Washington 98011 tomterrific3@juno.com Agency: Public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. This approach will produce results in half the time and save half the cost by focusing on strategic road improvements, and an aggressive trip reduction program with significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E305	SOL	1	Joseph R. Shuster 5908 155th Avenue NE Redmond, Washington 98052 joshu@email.msn.com Agency: Public	I applaud the effort and people behind this ambitious project but it seems awfully expensive for the anticipated returns on investment. Specifically, I think there could be better use of providing more flexible and convenient bus transportation. I know that changing people's commuting habits is a very difficult job but I believe that is really what is needed for our future. To reach for anything short of this is just a band-aid postponement on the real problem confronting us and the planet.	Thank you for your comment.
E306	ALT	1	Jessica Barr 34 Campanilla San Clemente, California 92673 jebarr24@hotmail.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E306	SOL	1	Jessica Barr 34 Campanilla San Clemente, California 92673 jebarr24@hotmail.com Agency: Public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E306	SOL	2	Jessica Barr 34 Campanilla San Clemente, California 92673 jebarr24@hotmail.com Agency: Public	I think it is due time that we realize that public transportation is a key to improving California's air quality along with easy the stress and aggravation traffic can cause drivers. These ideas of public transportation and ride sharing can only hope to promote jobs and possible ways of getting to meet new people and share ideas.	As discussed in Section 1.4 and Section 2.1 of the I-405 Corridor Program Draft EIS, the portion of the I-405 Corridor that is the subject of this EIS is located entirely with the central Puget Sound region of Washington. The proposed improvements are not expected to have any effect on air quality California.
E307	SOL	1	Aaron Robertson 862 Camino De Los Mares San Clemente, California 92673 arobertson@incadence.com Agency: Public	I would rather see a more efficient Train system then a wider freeway. When I lived in England for 2 years I traveled the train for everything, it was VERY convienient. I was looking at getting a job in Manhatten Beach last week and the commute from San Clemente was over an hour. I would rather take the train and be able to read or work on my laptop then drive in traffic. I am now looking at another job that would allow me to commute by train and I will take that over the other one for that reason alone. I think improving mass transit train routes is the best alternative. Please read on for more reasons and solutions.	As discussed in Section 1.4 and Section 2.1 of the I-405 Corridor Program Draft EIS, the portion of the I-405 Corridor that is the subject of this EIS is located entirely with the central Puget Sound region of Washington. The proposed improvements are not expected to have any effect on commutes California.

Code Number			Name	Comment	Response
E307	ALT	1	Aaron Robertson 862 Camino De Los Mares San Clemente, California 92673 arobertson@incadence.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E307	SOL	2	Aaron Robertson 862 Camino De Los Mares San Clemente, California 92673 arobertson@incadence.com Agency: Public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E308	ALT	1	Julia Kaufmann 186 Cesta Street Napa, California 94559 jul4ever@pacbell.net Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E308	SOL	1	Julia Kaufmann 186 Cesta Street Napa, California 94559 jul4ever@pacbell.net Agency: Public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E308	SOL	2	Julia Kaufmann 186 Cesta Street Napa, California 94559 jul4ever@pacbell.net Agency: Public	We need to seriously consider the addition of light rail on all major traffic corridors. Give people a viable alternative to driving their cars.	Alternatives 1 and 2 include a fixed-guideway solution, including the potential for light rail. However, it was determined that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E309	SOL	1	Brid Nowlan 10026 39th Ave NE Seattle, Washington 98125 bridn@seanet.com Agency: Public	I am writing to you as a concerned citizen - concerned about traffic problems, but also about environmental destruction. I have noticed an increase in traffic over the eight years I have lived here - along with an increase in smog and pollution. Long experience in other areas (such as Los Angeles and England) shows that widening and building roads leads to more traffic, not less. We cannot build our way out of this problem - we need to seriously consider alternative solutions, such as an expanded/improved bus service.	Alternative 3 - Mixed Mode Emphasis, would implement a high-capacity transit system throughout the study area using bus rapid transit (BRT). In addition, all action alternatives include an increase in transit service ranging from 50 percent up to 100 percent. Chapter 2 of the I-405 Corridor Program Draft EIS provides a description of these and other alternatives. Also, please refer to the response to comment E66.SOL-1.
E309	ALT	1	Brid Nowlan 10026 39th Ave NE Seattle, Washington 98125 bridn@seanet.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E309	SOL	2	Brid Nowlan 10026 39th Ave NE Seattle, Washington 98125 bridn@seanet.com Agency: Public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E310	ALT	1	Bill Finkbeiner 11251 110th Ave NE Kirkland, Washington 98033 billfinkbeiner@hotmail .com Agency: Public	WSDOT's Alternative 3 for I-405 should be implemented immediatly. The citizens of this state do not deserve the transportation infrastructure they are getting. Two lanes each way need to be added as soon as possible.	Please see response to comment L12.ALT-1.

Code Number			Name	Comment	Response
E311	ALT	1	Karen Hertz 9908-A NE 190th St. Bothell, Washington 98011 khz1962@aol.com Agency: Public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E311	SOL	1	Karen Hertz 9908-A NE 190th St. Bothell, Washington 98011 khz1962@aol.com Agency: Public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E311	SOL	2	Karen Hertz 9908-A NE 190th St. Bothell, Washington 98011 khz1962@aol.com Agency: Public	I would like to see businesses & government form more partnerships to solve these transportation problems, such as companies providing free bus passes to employees and other incentives to use transit. I would also like to see transit and carpool services expanded through creative promotionals to get people out of their cars. And we must have much higher gas tax to get people out of their gas-guzzling and space-hogging SUVs. Let's use some creative problem-solving, common sense, and good psychology to solves these problems sensibly. Building more lanes is just inviting more of the same trouble with 18 years of construction gridlock.	The I-405 TDM strategy includes substantial investment in transit passes and employer incentives to reduce SOV travel. Taxing (pricing) issues will be addressed through regional studies and negotiations that have been underway in recent years.
E312	ALT	1	Shane Macaulay 3832 132nd Ave NE Bellevue, WA 98005 shane.mac@gte.net Agency: Public	I'd like to state my preference for alternative number 4 for the 405 corridor plan, which is the general capacity emphasis. I think it will be the most useful.	Please see response to comment L30.ALT-1.
E313	TR	1	Richard Malm 911 87th Avenue NE Medina, Washington 98039-4834 rfmalm@aol.com Agency: public	There are only two factors driving urban traffic congestion: Increased population and Increased demand. There is little that can be done in the short or long run in the matter of increased population. Consructing additional general traffic lanes on any urban highway WILL NOT in the short run or long run significantly reduce traffic demand and hence congestion. Just look at the I-90 corridor between Issaquah and Seattle. On Friday, 24 august 2001, during the morning peak traffic the radio traffic report recommneded using SR-520 in lieu of I-90. That's a first in my book;	Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E313	SOL	1	Richard Malm 911 87th Avenue NE Medina, Washington 98039-4834 rfmalm@aol.com Agency: public	To reduce damnd and hence inprove opprotunities for private and transit vehilces on urban highways will require: 1. Aggressive DISincentives; and 2. Aggressive INcentives	Thank you for your comment.
E314	ALT	1	Melinda Morrow 1706 NW 57th St. Apt. 3 Seattle, Washington 98107 mkmorrow@yahoo.com Agency: public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E314	SOL	1	Melinda Morrow 1706 NW 57th St. Apt. 3 Seattle, Washington 98107 mkmorrow@yahoo.com Agency: public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E314	TR	1	Melinda Morrow 1706 NW 57th St. Apt. 3 Seattle, Washington 98107 mkmorrow@yahoo.com Agency: public	Speaking as a bus commuter, I can assure you that if bus routes, vanpools, park and rides, and carpooling are convenient and faster than driving alone, people will get out of their cars. Clearly, building more roads has not eased traffic congestion, so it's time to look elsewhere for answers. Please consider Alternative 5. Thank you.	Please refer to the response to comment E66.SOL-1.
E315	ALT	1	Sharon Wilson 11100 SE 176th St., Apt. L-305 Renton, Washington 98055 sharon.l.wilson@boeing.com Agency: public	WSDOT's Alternative 3 is a bad idea. I don't want the increased pollution and sprawl that will come from an increased number of single-occupancy vehicles on the road.	Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E315	SOL	1	Sharon Wilson 11100 SE 176th St., Apt. L-305 Renton, Washington 98055 sharon.l.wilson@boeing.com Agency: public	Please seriously consider Alternative 5 as proposed by Sensible Solutions for 405. Thank you.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E316	ALT	1	Kimberly Fee 23015 NE 19th Dr Sammamish, Washington 98053 kimberly_fee@hotmail.com Agency: public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E316	SOL	1	Kimberly Fee 23015 NE 19th Dr Sammamish, Washington 98053 kimberly_fee@hotmail.com Agency: public	In fact I am in favor of lightrails and electric buses as I avoid driving if I can because of traffic.	Thank you for your comment regarding public transportation.
E317	ALT	1	Patricia a Sunny Walter 12525 206th Pl SE Issaquah, WA 98027 sunny@sunnywalter.com Agency: public	Washington State Department of Transportation's "Alternative 3" plan for I-405, which calls for the construction of four new lanes and the widening of neighborhood streets over 18 years, is not the answer to the region's traffic problems. Not only have independent studies shown that reliance on new lanes creates more traffic, Washington cannot afford the $8 billion price tag. In addition, "Alternative 3" threatens our quality of life. It will harm neighborhoods by boosting traffic on local streets, increasing noise, air and water pollution and worsening sprawl.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.
E317	SOL	1	Patricia a Sunny Walter 12525 206th Pl SE Issaquah, WA 98027 sunny@sunnywalter.com Agency: public	I urge you to analyze "Alternative 5" as proposed by Sensible Solutions for 405. This plan will produce traffic improvements in half the time and at half the cost of "Alternative 3" by focusing on strategic road improvements, an aggressive trip reduction program and significantly increasing the number of buses, vanpools and park & rides. Thank you for your consideration.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E318	ALT	1	Joel Shank 1420 109th Ave. SE Bellevue, Washington 98004 labrador@pobox.com Agency: public	WSDOT's Alternative 3 for I-405 has four fatal flaws.1) Independent studies show that reliance on new lanes creates more traffic. 2) An $8 billion price tag should provide a good solution, not a temporary fix. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E318	SOL	1	Joel Shank 1420 109th Ave. SE Bellevue, Washington 98004 labrador@pobox.com Agency: public	I lived in Portland when the built MAX. Go ride it sometime and come back and tell me honestly that you still believe more traffic lanes are any kind of long term solution. Only light rail and incentives to reduce SOV are a solution.	Thank you for your comment.
E318	SOL	2	Joel Shank 1420 109th Ave. SE Bellevue, Washington 98004 labrador@pobox.com Agency: public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E319	ALT	1	Jeffrey Belt 15600 NE 8th St B1 PMB 480 Bellevue, Washington 98008 jeffounet@jeffounet.net Agency: public	I have read the 4 proposed alternatives for I-405 and can't say I like any of them. I would like to point out, however, that I appreciate that your estimates attempt to cover all costs, including arterial widening costs in the case of alternative 3. WSDOT has been thorough.	Thank you for your comment.

Code Number			Name	Comment	Response
E319	SOL	1	Jeffrey Belt 15600 NE 8th St B1 PMB 480 Bellevue, Washington 98008 jeffounet@jeffounet.net Agency: public	Alternative 5 as proposed by Sensible Solutions for 405, has elements I like, like lower cost, shorter schedule, and an emphasis on maximizing passenger capacity by, quite simply, filling more seats per travelling vehicle. I've seen over the years Commute Trip Reduction programs and higher-quality transit take hold at Microsoft: from Metro 263, to Flexpass, to longer HOV lanes for the ST 546 between Redmond and Seattle, to even faster service to the upcoming Overlake Transit Center. Meanwhile, I-405 is a very central north-sound corridor, and can't even offer reliable bus service because HOV lanes are on the wrong side (for instance, I again need to plan extra time on my 560 trip to Seatac tomorrow).	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. The I-405 Preferred Alternative includes a substantial investment in transportation demand management programs and expanded transit service throughout the Eastside. This will include better bus service in the east-west and north-south directions. The inside location of the HOV lanes is essential to combine with HOV direct access ramps providing priority access for transit into the HOV lane system. Please also refer to the response to comment E66.SOL-1.
E319	SOL	2	Jeffrey Belt 15600 NE 8th St B1 PMB 480 Bellevue, Washington 98008 jeffounet@jeffounet.net Agency: public	Finally, if given the opportunity to vote (which I hope), I will vote against anything that uses property, sales, and non-driving related taxes or fees, to pay for I-405. Any funds used to expand I-405, should come from those who drive on it, not on area residents like me who are fed up with the surrounding congestion. Why should I pay to encourage more drivers near my neighborhood?	In November 2001 the I-405 Corridor Program Executive Committee recommended support of use-based pricing in the region as part of an overall regional strategy. The feasibility of use-based pricing would need to be examined as part of a separate regional study. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E319	O	1	Jeffrey Belt 15600 NE 8th St B1 PMB 480 Bellevue, Washington 98008 jeffounet@jeffounet.net Agency: public	Please run Alternative 5 through your models and take the elements that work.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. The Sensible Solutions proposal is very similar in effects to Alternative 1 - HCT/TDM Emphasis, and Alternative 2 - Mixed Mode with HCT/Transit Emphasis. Model results for these alternatives are documented in the DEIS. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E320	SOL	1	c. robert ford 919 109th Ave. ne #1408 bellevue, Washington 98004-4496 flivvertoo@email.msn.com Agency: public	Do nothing. Stop spending money on studies except how to get more efficient usage of the current facilities. Get the long haul freight on the idle rails. Fund free public transit with a ton per mile driven tax imposed on all vehicles and tax studded tires for to save maintenance costs to be added to this fund.	The DEIS documents that doing nothing will not meet the purpose and need for the I-405 corridor.
E320	COST	1	c. robert ford 919 109th Ave. ne #1408 bellevue, Washington 98004-4496 flivvertoo@email.msn.com Agency: public	Besides taxes to build roads think what it costs motoring public in time and gasoline idling in oonstruction stalled traffic as gas approaches two dollars a gallon.	Thank you for your comment.
E320	SOL	2	c. robert ford 919 109th Ave. ne #1408 bellevue, Washington 98004-4496 flivvertoo@email.msn.com Agency: public	Stop listening to the special interests who benefit from excessive spending. Let's try thinking of methods other than spending more money on a system that will never be satisfied regardless of how much we spend.	Thank you for your comment.
E321	ALT	1	Dick Lee 15934 SE 46th Pl. Bellevue, Washington 98006 dlee@nbbj.com Agency: public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E321	SOL	1	Dick Lee 15934 SE 46th Pl. Bellevue, Washington 98006 dlee@nbbj.com Agency: public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E321	SOL	2	Dick Lee 15934 SE 46th Pl. Bellevue, Washington 98006 dlee@nbbj.com Agency: public	The solution to our transportation needs must look seriously at solutions other than building more roads. There are a number of reasons for this: 1) More roads promote more reliance on automobiles which require more roads; 2) Because our oil resources are finite, we must look for transportation mechanisms which do not rely on this finite resource; 3) The recent warm spell in August served to clearly illustrate the polution which are automobiles are producing and will produce in even greater quantity if there are more of them. The changes needed to shift away from an emphasis on automobile use will not come easily, especially in the kind of low density suburban area the East Side has become but now is the time to start.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3 - Mixed Mode Emphasis. Both bus rapid transit in the I-405 corridor and non-motorized improvements are evaluated and proposed as part of Alternative 3 and the Preferred Alternative. Please refer to the response to comment E66.SOL-1.
E322	O	1	sarah kulfan 11202 132 AVE NE Redmond, Washington 98052 coldfan@msn.com Agency: public	I have lived in the eastside my entire life and have experienced the traffic situation in our state becoming the mamoth road block that it is each morning noon and night. The quick fix to this problem has always been to focus on the roads. Public transportation for years has been pushed to the wayside and funding to improve this system is rare. The argument shouted the loudest is that public transportaion does not come close to the comfort the solitary driver can expererience in the luxury of his/her own car for the 2 hours they are trapped inside on a daily basis going to and from work. Unfortunatley, public transportation has not been given the attention is deserves and cannot breakdown the stereotypes, many that are rightly placed, that riding the bus epitomizes. I commute via Metro on a daily basis and it is uncomfortable crammed into the aisleway on jam-packed days. It is annoying how I have to be so careful to start and end my day at precise times so that I don't have to miss my ride. Most frustrating of all is that it is difficult to encourage other people to give up there car and instead take Metro when there are so many obvious reasons why they will not enjoy this method of transportation.	Thank you for your comment.
E322	SOL	1	sarah kulfan 11202 132 AVE NE Redmond, Washington 98052 coldfan@msn.com Agency: public	Catch 22. People will not be convinced to ride the bus unless it provides a comparable commute experience to that of their own car. Other methods have been tried for years. Please, encourage lawmakers to try this route and lets see where it leads.	Thank you for your comment.

Code Number			Name	Comment	Response
E322	ALT	1	sarah kulfan 11202 132 AVE NE Redmond, Washington 98052 coldfan@msn.com Agency: public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E322	SOL	2	sarah kulfan 11202 132 AVE NE Redmond, Washington 98052 coldfan@msn.com Agency: public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E323	SOL	1	Robert Clark 10854 NE 108th Street Kirkland, Washington 98033-5033 fsearch@yahoo.com Agency: Public	One thing that could be done immediately is to provide us on the Eastside, with a Metro Bus service that can deliver us within a block or two of work. The bus service should be designed to take us to the major work sites here, such as the Microsoft Campus area in Redmond. I live in Kirkland’s Forbes Creek valley and I was willing to drive to any park and ride in order to get to work at Honeywell Aerospace next to Microsoft in Redmond. It turned out to be impossible! Correcting public transportation here on the eastside would remove a large number of cars from 405 and 520.	Each of the action alternatives include substantially improved bus service. Your suggestion of better neighborhood transit service was included in the DEIS analysis, although the details of how such service would be implemented will need to occur at the more detailed project-level evaluation. We will make sure that your specific locations are identified during this process.
E324	ALT	1	Jon Stahl 9018 9th Ave NW Seattle, Washington 98117 jondstahl@hotmail.com Agency: public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E324	SOL	1	Jon Stahl 9018 9th Ave NW Seattle, Washington 98117 jondstahl@hotmail.com Agency: public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E324	SOL	2	Jon Stahl 9018 9th Ave NW Seattle, Washington 98117 jondstahl@hotmail.com Agency: public	The future livability of the entire Puget Sound area hinges on the decisions you are about to make. Make sure they're the right ones for us, for our children, and for this place we call home. It's time to stop trying to solve traffic by engaging in a futile quest to forever build move pavement, and to start investing in transportation alternatives that give us a real alternative to sitting in our cars.	Thank you for your comment.
E325	ALT	1	Christopher King 531 Malden Ave E Seattle, Washington 98112 cmking@seanet.com Agency: public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. This is explaned best in the book Stuck in traffic(Downs'92) 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. I will not vote for more SOV's under any circumstances without alot of mitigation 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. More cars are not needed. 4) It will increase noise, air and water pollution and worsen sprawl. The pressure is already too great, on the east side, to destroy the rural areas and natural habitats that still exist. This plan should not even be being considered. I will oppose it with money and time!!!!	Please refer to the response to comment E66.SOL-1.
E325	SOL	1	Christopher King 531 Malden Ave E Seattle, Washington 98112 cmking@seanet.com Agency: public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E326	ALT	1	Laura Fisher 7825 123rd Ave NE Kirkland, Washington 98033 lbfisher@att.net Agency: Public	I am writing to comment on the options for I-405 improvements. WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E326	SOL	1	Laura Fisher 7825 123rd Ave NE Kirkland, Washington 98033 lbfisher@att.net Agency: public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides. I live along the I-405 corrider and use it every day. Please choose Alternative 5 as the solution that will benefit me, my family, and others who use this highway more than any of the other alternatives.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E327	SOL	1	J Irons 1616 East Howell Street #107 Seattle, Washington 98122 jirons_sierraclub@hotmail.com Agency: public	Please accept this letter in support of the yet-to-be-proposed Alternative 5, as outlined and promoted by Sensible Solutions for 405. As a recent expatriot from the San Francisco Bay Area (and married to a north L.A. expat), I can speak to these areas' frustrations with vehicular traffic congestion. Organizations such as BATLUC (Bay Area Transportation and Land Use Coalition)have advocated for precisely the mixed mode transportation solutions found in Alternative 5. They realized how little new general purpose lanes and new connectors did to resolve long-term (10 years +) congestion. Please consider the experience of these and other regions that have had only marginal success (if any) in solving problems similar to those found in our region. In this light, extreme difficulty in raising the $8 billion minimum necessary to complete this auto-emphasized plan seems all the more unreasonable. Let's provide the region with more fiscally-sustainable, environmentally-responsible transportation solutions. Promote Alternative 5.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E328	ALT	1	Sandra K. Duncan 1596 Rock Creek Ridge Blvd. SW North Bend, WA 98045 sandid@seedlaw.com Agency: public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E328	SOL	1	Sandra K. Duncan 1596 Rock Creek Ridge Blvd. SW North Bend, WA 98045 sandid@seedlaw.com Agency: public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E328	SOL	2	Sandra K. Duncan 1596 Rock Creek Ridge Blvd. SW North Bend, WA 98045 sandid@seedlaw.com Agency: public	I STRONGLY URGE YOU TO CONSIDER ALL OTHER ALTERNATIVES TO ADDING MORE LANES TO I-405. LOOK AT OTHER PARTS OF THE COUNTRY -- WHEN THEY ADDED MORE LANES -- MORE CARS FILLED THEM UP. YOU HAVE TO STOP THIS SOMEWHERE! PLEASE DO IT NOW! THANK YOU.	Alternative 1 - High-Capacity Transit/TDM Emphasis, does not include any increase in roadway capacity beyond the No Action Alternative. Also, please refer to the response to comment E66.SOL-1. However, it was determined that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
E329	SOL	1	Jeff Thomas 1023 NE 92nd St. Seattle, Washington 98115 jefft@onyx.com Agency: public	Note that even if Alternative 5 is not considered sufficient as an entire solution, we should strongly consider combining features of Alternative 5 with any other solution.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E329	SOL	2	Jeff Thomas 1023 NE 92nd St. Seattle, Washington 98115 jefft@onyx.com Agency: public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E329	ALT	1	Jeff Thomas 1023 NE 92nd St. Seattle, Washington 98115 jefft@onyx.com Agency: public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E330	TR	1	Judith Bentley 4747 132nd Ave. S.E. Bellevue, Washington 98006 judithbentley@cs.com Agency: public	As a person who chaired the EAst Bellevue Transportation Study Advisory Committee, I have some experience with looking at proposals to more efficiently move people. One of the things I learned from my three years on that citizen committee was that adding lanes of traffic usually doesn't help. It only attracts more single occupancy vehicles and crowds neighbhorhood streets even more.	The alternatives evaluated cover a wide range of multimodal solutions.
E330	SOL	1	Judith Bentley 4747 132nd Ave. S.E. Bellevue, Washington 98006 judithbentley@cs.com Agency: public	Thus I'm opposed to adding four lanes to I-405. This highway runs right through the middle of Bellevue and divides neighborhoods. It serves those who are traveling through much more than residents of Bellevue (I avoid it completely except to get on and off I-90 without even merging onto 405.) I urge you to consider an alternative that costs less, is less disruptive, doesn't attract more cars, and emphasizes carpooling, vanpools, buses, and even light right. I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405.	Alternative 1 - High-Capacity Transit/TDM Emphasis, does not include any increase in roadway capacity beyond the No Action Alternative. However, it was determined that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Also, please refer to the response to comment E66.SOL-1.
E331	ALT	1	Lynn Glessner 17628 W Lake Desire Dr Se Renton, Washington 98058 lglessner@hotmail.com Agency: public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E331	SOL	1	Lynn Glessner 17628 W Lake Desire Dr Se Renton, Washington 98058 lglessner@hotmail.com Agency: public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
E331	O	1	Lynn Glessner 17628 W Lake Desire Dr Se Renton, Washington 98058 lglessner@hotmail.com Agency: public	I would love to take the bus, it is impossible for me to get a bus from Renton to Issaquah without 3 transfers. It is incredibly outdated to assume that bus service should mainly be in and out of downtown Seattle.	The transit alternatives included in the DEIS include improved services between major centers on the Eastside.
E332	ALT	1	Stonewall Bird 608 South First Street, Apt. 212 Mount Vernon, Washington 98273 sjbird@cnw.com Agency: public	WSDOT's Alternative 3 for I-405 has four fatal flaws. 1) It won't work. Independent studies show that reliance on new lanes creates more traffic. 2) We cannot afford the $8 billion price tag; such massive tax increases are not realistic. 3) Alternative 3 will harm neighborhoods by increasing traffic on local streets. 4) It will increase noise, air and water pollution and worsen sprawl.	Please refer to the response to comment E66.SOL-1.
E332	SOL	1	Stonewall Bird 608 South First Street, Apt. 212 Mount Vernon, Washington 98273 sjbird@cnw.com Agency: public	I urge you to analyze Alternative 5 as proposed by Sensible Solutions for 405. Alternative 5 will produce results in half the time and at half the cost by focusing on strategic road improvements, an aggressive trip reduction program and significantly more buses, vanpools and park & rides.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, and substantial expansion of bus transit service including a new bus rapid transit system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
E332	O	1	Stonewall Bird 608 South First Street, Apt. 212 Mount Vernon, Washington 98273 sjbird@cnw.com Agency: public	For 50 years or more our public policy has had the effect of forcing people to buy cars in order to get around. Now an independent study shows that the average cost of transportation in this country for households (18% of income) is only just below the cost of shelter (19%). For 40% of households the share of transportation is more than 25%, making transportation the largest single expense item in households that are strapped to provide essentials like food, shelter, clothing, medical care and education. Our policy of roads-and-cars-ueber-alles has made an inessential in effect an essential and the DEIS needs to take this equity issue into account. Alternative 3 will exacerbate the inequity of our transportation system. Alternative 5 will start on the path of restoring equity.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS.

Code Number			Name	Comment	Response
E333	ALT	1	Jennifer L. Woods 3455 S. 344th Way Ste. 220 Federal Way, WA 98001 jwoods@volt.com Agency: public	Subject: I want alternative number two	Please see response to comment E31.ALT-1.
T1	PPA	1	Mike Noblet City Hall, Bothell, WA Agency: City of Bothell	The City of Bothell Council unanimously supports the Preliminary Preferred Alternative which would, in our mind, give us the ability for more mobility within the city, increasing general purpose lanes going to the north and the south by two as well as offering expanded bus service in the area. Studies show that that kind of increase would give significant more value for transportation in the Bothell area as opposed to maybe adding lanes in the south.	Please see response to comment E29.PPA-1.
T1	TR	1	Mike Noblet City Hall, Bothell, WA Agency: City of Bothell	Why is this an issue? We have cut-through traffic in Bothell right now with a projected increase on 405. It will only get worse through our neighborhoods. That will improve the quality of the environment where people live in Bothell. Part of this Preferred Alternative would include expanding the arterials for 522, 527, which would also take some of the pressure off neighborhoods, and that is a significant issue facing the city right now is the proverbial cut-through traffic. And as we -- the increase on 405 is such the people are looking for alternatives, which seem rational to them but not rational to the people living in Bothell.	Thank you for your comment regarding solutions along I-405.
T1	PPA	2	Mike Noblet City Hall, Bothell, WA Agency: City of Bothell	So for these reasons, we support what is considered the Preliminary Preferred Alternative. We know there is a lot of work to be done, but we feel that offers the best long-term solution for everyone in the city of Bothell.	Please see response to comment E29.PPA-1.
T2	SOL	1	Mark Keller P.O. Box 15165 Seattle 98115 Agency: Cascade Bike Club	I'm here this evening on behalf of the nearly 5,000 members of the Cascade Bicycle Club to urge you to analyze the new Alternative 5 proposed by the Coalition for Sensible Solutions for 405.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T2	SOC	1	Mark Keller P.O. Box 15165 Seattle 98115 Agency: Cascade Bike Club	As a bicycling advocacy organization, the Cascade Bicycle Club supports the development of livable communities. Adding new general purpose traffic lanes to I-405 as envisioned in Alternative 3 will make communities less livable by creating conditions that are inhospitable to bicycling and walking.	Thank you for your comment.

Code Number			Name	Comment	Response
T2	LU	1	Mark Keller P.O. Box 15165 Seattle 98115 Agency: Cascade Bike Club	Building more general purpose lanes will increase dependence on the automobile and exacerbate urban sprawl.	Please see the responses to comments L27.LU-1 and E66.SOL-1.
T2	TR	1	Mark Keller P.O. Box 15165 Seattle 98115 Agency: Cascade Bike Club	Automobile use will expand to fill the capacity created by new general purpose lanes and could actually make traffic worse. More car traffic will congest urban and suburban neighborhoods, creating conditions that discourage bicycling and walking. Collector streets expanded to feed 405 will form barriers to pedestrian and bicycle traffic because they will be difficult or hazardous to cross. These outcomes are contrary to Puget Sound Regional Council's goal of 20 percent of trips using nonmotorized modes by 2030.	We are not aware of the PSRC goals for nonmotorized modes for 2030. The I-405 Preferred Alternative includes investments in bicycle and pedestrian facilities across I-405 and tied to regional trail systems. Please also refer to the response to comment E66.SOL-1.
T2	O	1	Mark Keller P.O. Box 15165 Seattle 98115 Agency: Cascade Bike Club	Increasing automobile dependence also contributes to declining public health. In addition to Alternative 3's $8 billion price tag, we will pay for new highway capacity in obesity, illness, premature deaths, and health care costs.	Analysis and discussion of the relationship between automobile dependence and public health is outside the scope of this EIS.
T2	AQ	1	Mark Keller P.O. Box 15165 Seattle 98115 Agency: Cascade Bike Club	Finally, the additional automobile traffic that will fill in any general purpose lanes will increase air pollution in a region that already violates standards set by the Clean Air Act. Ironically, poor air quality can make bicycling and walking a health risk at exactly those times when alternative transportation would provide the greatest benefits.	Currently, the Puget Sound region has been determined to be within attainment of the national ambient air quality standards; however, the attainment status is only being maintained through regional programs, such as commute trip reduction and vehicle inspection and maintenance. In general, increased traffic delay, which may result from increases in traffic volume or decreases in capacity, results in increased pollutant emissions. Conversely, decreases in delay, whether a result of reduced traffic volumes or increased system capacity, result in decreased pollutant emissions. The EIS provides a detailed comparison of regional pollutant emissions under each of the alternatives. The co-lead agencies recognize that non-motorized transportation provides air quality benefits to the Puget Sound region.

Code Number			Name	Comment	Response
T2	SOL	2	Mark Keller P.O. Box 15165 Seattle 98115 Agency: Cascade Bike Club	The long-term transportation needs in the I-405 corridor will be best addressed by tackling real land use and transportation demand problems at their root. Alternative 5 proposes real solutions to the problem, with incentives to encourage smart growth and development. These tools can reduce travel distances and encourage us to walk, bike, and use transit more often. Trip reduction strategies in Alternative 5 are a proven method of reducing automobile trip demand. Alternative 5 provides for roadway investments where they are really needed, but perhaps most importantly solutions that enable viable choices that include cars, bikes, buses, rapid transit, and our own feet make our community stronger, healthier and less vulnerable to disruption.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T2	O	2	Mark Keller P.O. Box 15165 Seattle 98115 Agency: Cascade Bike Club	We are an innovative and adaptive society. As a region, we are proving that we can adapt to using less energy and different sources of energy. We can also adapt to using less transportation and different forms of transportation.	Thank you for your comment.
T3	O	1	Amanda McCloskey 766 Thomas Seattle, Washington 98119 Agency: Livable Communities Coalition	I manage a network of growth management activists across King County, and so have had many occasions to drive on 405. Especially in South King County, it's clear that 405 isn't safe and it needs improvements. So my recommendation is safety first, fix the key to a point and do so with fiscal restraints.	Thank you for your comment.
T3	EJ	1	Amanda McCloskey 766 Thomas Seattle, Washington 98119 Agency: Livable Communities Coalition	I went through the DEIS this afternoon, and I have some major concerns about the human environmental and fiscal costs of the Preferred Alternative. On page ES-50 of the DEIS, it lists Alternative 3 as displacing 330 residents and 110 businesses. It doesn't list the census data for those displaced, so I think that's something that the next EIS should look at.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the I-405 Corridor Program Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred

Code Number			Name	Comment	Response
					alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. This programmatic DEIS does not attempt to provide specific information for potential displacees. A corridor screening and further public outreach was conducted to locate low-income and minority residents who may be impacted. Project-level environmental analyses will be performed at a later date that will provide more detailed analysis about impacted residents and businesses. Also refer to the response to comment E287.EJ-1.
T3	EJ	2	Amanda McCloskey 766 Thomas Seattle, Washington 98119 Agency: Livable Communities Coalition	Are some of these low income households being displaced, and is there an environmental justice issue here?	Presidential Executive Order (EO) 12898 and Federal Highway Administration (FHWA) Order 6640.23 establish that it is Federal policy to avoid to the extent practicable disproportionately high and adverse human health or environmental impacts on the minority or low-income population. For purposes of the environmental justice analysis conducted for the I-405 Corridor Program DEIS, significant adverse impacts were considered synonymous with high and adverse impacts as described in EO 12898 and FHWA Order 6640.23. As reported in the other expertise reports prepared for the I-405 Corridor Program, including the I-405 Corridor Program Draft Right-of-Way and Displacements Expertise Report, at the level of analysis performed, no substantial adverse impacts are expected as a result of this project. Consequently, none of the impacts of this project can be described as having a high and adverse impact in the context of EO 12898 or FHWA Order 6640.23. As there are no high and adverse impacts expected as a result of this project, the analysis therefore concluded that no high and adverse human health or environmental effects of the project are expected to fall disproportionately on minority or low-income populations. The project was therefore considered to be consistent with the policy established in EO 12898 and FHWA Order 6640.23. For further discussion of the methodology used in this environmental justice analysis, please see the Methodology and Approach section on pages G-1 and G-2 in Appendix G of the I-405 Corridor Program DEIS.

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T3	WET	1	Amanda McCloskey 766 Thomas Seattle, Washington 98119 Agency: Livable Communities Coalition	In terms of environmental cost, page ES-39 states that Alternative 3 would impact 168 wetlands, 56 of which are high priority. And it talks about mitigation efforts. But my experts tell me that the mitigation techniques don't really work and that the best alternative is to keep the existing wetlands.	As stated in Section 3.6.5.1 of the Draft EIS, avoidance of impacts is the preferred approach. Wetland mitigation success and failure can be measured in many different ways. Because mitigation is recognized as not guaranteed to be 100 percent effective in replacing lost wetland functions, most jurisdictions require greater than a 1:1 mitigation ratio. This is noted in Section 3.6.5.1. In addition to mitigating at the required ratios, WSDOT biologists monitor mitigation progress and identify maintenance needed to achieve mitigation success. Every mitigation plan has a contingency plan to be implemented in the event that mitigation performance standards are not met.
T3	WR	1	Amanda McCloskey 766 Thomas Seattle, Washington 98119 Agency: Livable Communities Coalition	Also page 42 reports that Alternative 3 would create 600 acres of new impervious surface and that's a lot of impervious surface for water runoff, and it would decrease the water quality in the area, thereby affecting salmon habitats.	Each of the alternatives would result in various amounts of additional impervious area. This, in turn, would result in increases in stormwater runoff and associated pollutants. The effects upon local streams will be spread along a 30-mile corridor. Stormwater treatment and detention will be provided to offset these impacts. In addition, the individual road projects will present opportunities to provide stormwater treatment to existing roads (also known as retrofit), many of which currently have no treatment facilities. Depending upon the level of retrofit, a net water quality improvement might result.
T3	COST	1	Amanda McCloskey 766 Thomas Seattle, Washington 98119 Agency: Livable Communities Coalition	My final point is to urge restraint with the fiscal cost. $8 billion is a huge price tag.	Thank you for your comment.
T3	SOL	1	Amanda McCloskey 766 Thomas Seattle, Washington 98119 Agency: Livable Communities Coalition	Alternative 5 proposed by the Sensible Solutions for I-405 Coalition recommends an alternative at half that cost, and I highly recommend that you look at that.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T4	O	1	Ben Cox 320 221st Street Southeast Bothell Agency: Public	Hello. My name is Ben Cox, 320 221st Street Southeast in Bothell. And I'm afraid that after I listened to your description of what we should be prepared to talk about that I'm unprepared. So I will make my comments in written form. So I apologize for taking up the time, and thank you.	Your comment is acknowledged.

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T5	O	1	Peter Hurley Agency: Transportation Choices Coalition	I would also like to thank other members of the executive committee for taking time to meet with us along the way and provide the information we need to come up with what we hope to be an alternative worthy of consideration.	Thank you for your comment.
T5	COST	1	Peter Hurley Agency: Transportation Choices Coalition	We're asking that the executive committee and the staff evaluate a lower cost alternative. We are doing so because we believe a higher-cost alternative is highly unlikely to be built, and by proposing a higher-cost alternative we're actually increasing delays. So we came up with a proposal that's considerably less expensive.	Please refer to the response to comment E66.SOL-1.
T5	O	2	Peter Hurley Agency: Transportation Choices Coalition	We also have concerns about the numbers that were used in the analytical approach in the EIS that there are some problems, that if they were fixed would make for better analysis, and to do so in a supplemental environmental statement so that we can look at the alternatives on a level playing field.	Your testimony does not provide adequate justification to prepare a supplemental environmental impact statement. The co-lead agencies have reviewed all public and agency comments and have concluded the information contained in the I-405 Corridor Program EIS is accurate and sufficient without requiring a supplement.
T5	SOL	1	Peter Hurley Agency: Transportation Choices Coalition	We actually are going to be turning in something that describes the alternatives, but the three major areas -- we're calling this a triple win approach because there's three major areas. Most of the capital cost for doing the roads, about $2 billion of the total $3 billion program, would go into highway investments. It would focus those investments in the southern end of the corridor where the congestion is worst right now, between I-90 and I-5. It would also add some fairly significant capacity investments in the central and northern portions through truck climbing lanes and through connections between -- for example, State Route 522 and State Route 527 where there's a lot of merging-in traffic that slows people down, slows freight down as well, so we would add lanes there. We would also look at significant HOV increases. We would also look at transit, not just in one corridor, the major 405 corridor, but also in two others: On the east-west arterials and along the Burlington Northern Santa Fe route, also known as the dinner train route, for additional transit service. We would also increase incentives pretty dramatically, a very innovative entrepreneurial grant program to encourage telework, parking cashout, and other incentives so people will drive less. So I'll stop there, and I think Kevin Shively will elaborate.	Thank you for your suggestions. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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T6	COST	1	Kevin Shively Agency: Transportation Choices Coalition	And I'll just complete our ideas on Alternative 5. We're asking that you please evaluate this alternative. Peter just mentioned, and it will be elaborated further in the written documents because, in the first place, it's a better plan for tax payers that $3.0 billion that is less than half of the cost of the Preferred Alternative of the Washington State Department of Transportation. That lower cost means it's more likely to be built in the long run. So it's better for the entire region.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T6	SOL	1	Kevin Shively Agency: Transportation Choices Coalition	Secondly, that plan, Alternative 5, is better for commuters with more incentives for trip reduction, more jobs close to transit, better transit service, and less highway widening, will offer commuters more choices and less traffic.Thirdly, this plan would be better for neighborhoods and for nature. With less highway widening, there would be fewer trips made on neighborhood streets, accessing the new capacity than is proposed to expand in Alternative 3. Less pavement also would mean less water runoff and less sprawl into outlying areas that could be generated by that increased capacity, and less salmon and wildlife habitat destruction. So those are some of the reasons to support Alternative 5.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T6	ALT	1	Kevin Shively Agency: Transportation Choices Coalition	Briefly, I wanted to go over some of the four serious flaws that we identified with Alternative 3. Number 1: It's too expensive. As I mentioned, it's $7.7 billion. There are other priority projects in the Puget Sound Region like Alaskan Way Viaduct, I-520, I-5, and other transit investments that will possibly be vying for State funds.	Please refer to the response to comment E66.SOL-1.
T6	ALT	2	Kevin Shively Agency: Transportation Choices Coalition	Secondly, it won't work. Build it and they will come. Independent studies -- countless independent studies and experience in other parts of this country show that 90 percent of new road capacity is typically gobbled up with new trips within five years of construction. And this -- in our region this could take place while we're experiencing 10 to 15 years of construction-related delays on I-405.	Please refer to the response to comment E66.SOL-1.
T6	ALT	3	Kevin Shively Agency: Transportation Choices Coalition	Thirdly, it will harm neighborhoods. Adding this new pavement will draw thousands of new trips, increasing that traffic from side streets and arterials, accessing the capacity of new lanes.	Please refer to the response to comment E66.SOL-1.
T6	ALT	4	Kevin Shively Agency: Transportation Choices Coalition	Fourthly, it will worsen air pollution and sprawl. Scientific studies show that new lanes will worsen water and air pollution, and four new lanes will encourage people to live and work further out, as I mentioned before.	Please refer to the response to comment E66.SOL-1.

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T6	SOL	2	Kevin Shively Agency: Transportation Choices Coalition	So please consider Alternative 5. We feel it is a highly workable solution that can be the best bet for the region.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS.
T7	O	1	Carl Munson 2309 236th Street Southwest Lynnwood Agency: Public	It's my personal conviction that what we are here about tonight is not the problem, it's the symptom of a problem. And, again, in my view the problem is overpopulation.	Thank you for your comment.
T7	SOL	1	Carl Munson 2309 236th Street Southwest Lynnwood Agency: Public	A former supervisor of mine had what I thought was a very excellent solution to that problem. It is retroactive contraception. But I found that this is not popular with most persons, and so far there have been no volunteers. So we can count that out.	Thank you for your comment.
T7	O	2	Carl Munson 2309 236th Street Southwest Lynnwood Agency: Public	And a plan of the magnitude which we are considering, we are going to have to have support of the community. And if there is any question about threat or proceeding from the known to the unknown, we are going to meet a lot of resistance. So it means a massive educational push so that persons come on board in terms of, yes, this would work in that it would relieve the problem -- or the perceived problem. Again, it's a symptom of the problem, not the problem. And I don't know to what extent the groups that are working, which are focused on the technical aspects, have been looking carefully at what about human reactions to what we are considering. And I hope that that is in consideration of the group that is working with it.	Thank you for your comment.
T8	ALT	1	Sydney Elmer 613 North 137th Street Seattle 98133 Agency: One Thousand Friends of Washington	We are concerned with Preferred Alternative 3 because, first of all, there's a 1995 University of California study that says new general purpose capacity almost always fills up within five years of completion of construction. And a local example of that is with the I-90 bridge. When that was built, the capacity just filled that up pretty quickly.	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. The Preferred Alternative is similar to Alternative 3 - Mixed Mode Emphasis. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

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T8	ALT	2	Sydney Elmer 613 North 137th Street Seattle 98133 Agency: One Thousand Friends of Washington	Secondly, increased traffic due to four new general-purpose lanes will cause a dramatic increase in neighborhood traffic, and four new general purpose lanes will also encourage people to live and work farther from the city, which will increase sprawl.	Please refer to the response to comment E66.SOL-1.
T8	SOL	1	Sydney Elmer 613 North 137th Street Seattle 98133 Agency: One Thousand Friends of Washington	We encourage you to study Alternative 5, which has put forth five sensible solutions to 405. And that alternative focuses construction on the south end of the corridor, increases transit including the Burlington Northern right-of-way, and emphasizes trip reduction and an emphasis on smart land use. Thank you.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T9	O	1	Paul Cowles 18536 94th Avenue Northeast Bothell Agency: I-405 Corridor Program Citizens Committee	I'm going to congratulate DOT in this process. This is the most broad ranging, wide open process that I have ever seen in a traffic study. That's part of the reason why you're hearing some objections about the data as far as the TDM, Transportation Demand Management folks, because for the first time we've had general capacity and TDM and looking at them on an equal basis, and an equal footing.	Thank you for your comment.
T9	O	2	Paul Cowles 18536 94th Avenue Northeast Bothell Agency: I-405 Corridor Program Citizens Committee	And we've come to some very vital conclusions of what will and will not work. We've got costs, preliminary cost estimates -- and again, we're talking about one percent of this total project we've got now as far as this planning process. Everything is in comparative analysis here.	Your comment is acknowledged.
T9	SOL	1	Paul Cowles 18536 94th Avenue Northeast Bothell Agency: I-405 Corridor Program Citizens Committee	TDM does work sometimes, but the thing is you're limiting the choices of the citizenry which are now voting by their driving habits to use roadways.	Thank you for your comment.

Code Number			Name	Comment	Response
T9	ECON	1	Paul Cowles 18536 94th Avenue Northeast Bothell Agency: I-405 Corridor Program Citizens Committee	You've got to understand something: This is not just a conveyant system of commuters. These are economic concrete ribbons going up and down our corridor. The economics of this scenario is that basically you cannot move freight. We're loosing valuable time in traffic on the freight side -- the business side. From an economic standpoint, for quality of life, you don't have a quality of life if you don't have economic vitality, and that's what we're starting to show.	Thank you for your comment.
T9	ALT	1	Paul Cowles 18536 94th Avenue Northeast Bothell Agency: I-405 Corridor Program Citizens Committee	Yeah, I have a preferred alternative, that's 3, but I'm going to sit here and say every one of these was analyzed to the nth degree by the steering committee, by the citizens' committee, and by the executive committee. It's the first fair alternative look at all elements of transportation. I object to these people saying that there's an alternative 5. It did not go through the scrutiny. It may be a proposal, but it is not an alternative. It has not the same indepth study and analysis that this program's had.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Also, please refer to the response to comment E66.SOL-1.
T9	SOL	2	Paul Cowles 18536 94th Avenue Northeast Bothell Agency: I-405 Corridor Program Citizens Committee	As far as additional capacity, we need that to get those folks that are already in our neighborhoods back on the major arterials that carry our commuters and our freight in this area.	Thank you for your comment.
T9	O	3	Paul Cowles 18536 94th Avenue Northeast Bothell Agency: I-405 Corridor Program Citizens Committee	I appreciate what you folks have done here, and I just hope that when we go forward with this that we can get this wrapped up. And anything worthwhile is worth working for a long time. Yes, it's costly, but compare it to what the entire region's economic productivity is, and you'll find it's very affordable.	Thank you for your comment.
T10	ALT	1	Hank Myers 17409 Northeast 22nd Redmond Agency: Public	Having said that, I want to urge this committee strongly to approve Alternative 3 because it will provide real transportation improvement within the area. You've heard several arguments why it shouldn't happen, and all of those arguments are either red herrings or they are -- can be overcome by some very simple funding mechanisms.	Please see response to comment L12.ALT-1.

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T10	COST	1	Hank Myers 17409 Northeast 22nd Redmond Agency: Public	First of all, an $8 billion price tag seems very high, but I must also tell you that the people who have raised this as an objection -- I just got a fund-raising letter from them -- and if you added up the dollars of the project that they are supporting and working for, $8 billion is actually chump change. It's going to be expensive, and we have to look at ways of funding this, but I must say that it is going to provide the best alternative and the best transportation improvements that could be had.	Thank you for your comment.
T10	ALT	2	Hank Myers 17409 Northeast 22nd Redmond Agency: Public	So I urge you to approve Alternative 3, and I encourage you to approve it quickly.	Please see response to comment L12.ALT-1.
T11	O	1	Ray Gould 19225 92nd Avenue West Edmonds, Washington 98020 Agency: Thousand Friends of Washington/Citizens' Oversight Panel for Sound Transit	What I want to talk to you about a little bit tonight is, first of all, to say to you, thank you for the opportunity to come and learn about the project. That's very helpful to us citizens.	Thank you for your comment.
T11	COST	1	Ray Gould 19225 92nd Avenue West Edmonds, Washington 98020 Agency: Thousand Friends of Washington/Citizens' Oversight Panel for Sound Transit	And I want to talk to you about money. My major concern right focus on the estimated cost of the project, and I think what most citizens will look at first. The four alternatives proposed show a range from somewhere around $5 billion to $11 billion, with a preferred alternative at about $7 billion. And I say to you that I think Sensible Solutions must propose reasonable costs. With the current federal and state fiscal priorities and problems -- it was just today the Boeing corporation announced they're going to cut thirty thousand employees in the northwest here in commercial airplane production, and the governor said that's going to be a terrible impact on the state economy, which is already a problem.	Thank you for your comment.

Code Number			Name	Comment	Response
T11	SOL	1	Ray Gould 19225 92nd Avenue West Edmonds, Washington 98020 Agency: Thousand Friends of Washington/Citizens' Oversight Panel for Sound Transit	I think you have to build reality into the project that you propose. And for those reasons I believe that the Sensible Solutions proposal of about $3 billion should also be very seriously considered.	Please refer to the response to comment E66.SOL-1.
T12	WILD	1	Tim Stearns 418 First Avenue West Seattle 98119 Agency: National Wildlife Federation	We did an assessment over the last two years of the Endangered Species Act in causes of decline around the nation, and we were quite surprised to realize that species' decline was largely -- one of the largest factors was sprawl and new transportation systems. So we have taken a fairly strong assessment in transportation and realized that habitat fragmentation, connectivity disruption, water quality declines are all key to keeping species intact.	Habitat fragmentation and connectivity is addressed in Section 3.6. Water quality impacts are addressed in Section 3.5. Impacts to ESA-listed species are addressed in Sections 3.7 and 3.8. Also, please refer to the responses to comments L27.LU-1 and L43.LU-3 which address the transportation and growth issue.
T12	FATE	1	Tim Stearns 418 First Avenue West Seattle 98119 Agency: National Wildlife Federation	It led us to a conclusion that we need to do a better job of integrated planning including land use, transportation, energy, water, species recovery. And this is clearly a time in the northwest that we need projects that have net improvements in salmon and water quality. We can't afford to have them seen as afterthoughts.	The co-lead agencies agree that integration of land use and transportation with species recovery is important. Efforts will be made to provide protection to natural systems in order to protect natural resources.
T12	TR	1	Tim Stearns 418 First Avenue West Seattle 98119 Agency: National Wildlife Federation	The existing EIS is a strong beginning of an integrated package, but we believe it needs further work, but believe that that can happen between now and the final EIS stage. It's not clear how this project fits into the larger Puget Sound transportation package, and choices we make here will affect the choices we have on I-90 and 520.	The I-405 Corridor Program was closely coordinated with the other regional planning efforts, such as Trans-Lake Washington Study, Sound Transit's Regional Transit System Plan, PSRC Metropolitan Transportation Plan (MTP), and the Eastside Transportation Partnership's Mobility Action Program (ETP). Section 3.12.1.2 in the FEIS includes a section regarding the relationships of I-405 to other regional programs.
T12	FATE	2	Tim Stearns 418 First Avenue West Seattle 98119 Agency: National Wildlife Federation	The fisheries report suggests that it will also significantly affect population shifts around Puget Sound. Just to realize my concern -- or underscore my concern -- this affects three distinct Chinook populations: the Green River population, the Cedar River population, the Lake Washington population. This project will cross 260 streams, 122 that support salmon, 61 that have ESA considerations. We need to do a better job in the final of integrating salmon recovery into the package. We're not there yet, but I think we've got a real opportunity here to make a real model project.	The co-lead agencies agree that the I-405 Corridor Program should be a model for integrating salmon recovery projects into any package of mitigation needed for transportation improvements, and the "mitigation concept" presented in Appendix J of the Final EIS demonstrates how such integration will be achieved so the program can succeed in facilitating salmon recovery and become just such a model.

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T12	FATE	3	Tim Stearns 418 First Avenue West Seattle 98119 Agency: National Wildlife Federation	We also need a clear path on how we will deal with the Endangered Species Act and Clean Water Act consultation, and to actively and effectively consult with the tribes in the region.	Endangered Species Act and Clean Water Act consultation will have to be addressed separately for each of the program's numerous construction projects. Indian Tribes have been included in the EIS coordination, and will be consulted regarding fisheries issues for the individual projects.
T12	CU	1	Tim Stearns 418 First Avenue West Seattle 98119 Agency: National Wildlife Federation	I believe that we have an opportunity here to proactively deal with impacts and avoid impacts. If we begin to specify construction timing, where we'll get gravel supplies, and include indirect and cumulative impacts.	Construction timing and location of gravel sources will be identified and evaluated in greater detail when they are known, during future project-level environmental analysis, documentation, and review. Secondary impacts will be more detectable at that time, and will also be analyzed in future project-level environmental documentation. Cumulative effects of the I-405 Corridor Program alternatives, including the Preferred Alternative are included in the Final EIS in Chapter 3.23, and may be further evaluated at the project level.
T12	SOL	1	Tim Stearns 418 First Avenue West Seattle 98119 Agency: National Wildlife Federation	I would urge you to actively consider Alternative 5 and choose a solid alternative that can get broad support because when we go back to Congress with a broader Puget Sound package, we are going to need a unified front.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T13	FATE	1	Eric Espenhorst 120 Avenue A, Suite D, Snohomish, Washington 98290 Agency: National Wildlife Federation/Thousand Friends of Washington/Transportation Choices Coalition	The salmon, as the Environmental Impact Statement points out, in this region are at perilously low levels. It's regrettable that none of the alternatives make the effort to reverse that trend. They all say it's just too hard. None of the alternatives will make any significant difference in the future of the salmon population in this region. That appears to be ducking the tough issue of whether or not recovery is the path or if the governor's extinction is not an option. In fact, maybe it does leave open that option. I hope it doesn't.	The high current and projected rate of human population growth in the study prevents even the No Action Alternative from altering the existing negative trends in salmon populations. No alternative has been developed that will both improve transportation for a rapidly growing population, and also compensate for the effects of past habitat degradation.

Code Number			Name	Comment	Response
T13	WR	1	Eric Espenhorst 120 Avenue A, Suite D, Snohomish, Washington 98290 Agency: National Wildlife Federation/Thousand Friends of Washington/Transportation Choices Coalition	Some of the earlier expertise reports, the land use and the fishery expertise reports, noted that Alternatives 1 and 2 would have the effect of increasing urban infill, lowering impervious surfaces created throughout the region -- an impervious surface as the report notes is generally very harmful to salmon, both directly and as a symptom. And Alternatives 3 and 4 tended to promote the highest levels of impervious surface throughout the basin. Now, from the February expertise report which is in draft form, to the August fisheries and aquatic habitat expertise report which was released with the Environmental Impact Statement, that conclusion was reversed, and there was no change in the data that supported the conclusion. So it creates the appearance that the expertise reports are actually public relations documents.	Alternative 2 contains a provision for some form of light rail transportation, which was not fully accounted for in the early version of the impervious area estimates. This may account for the roughly similar amounts of impervious area under Alternatives 2 and 3 in the current version of the I-405 Corridor Program Draft Fish and Aquatic Habitat Expertise Report alluded to in the comment. Note that these estimates are for new impervious area resulting from the various road and transportation projects. These figures do not include indirect effects due to new development, infill, etc.
T13	FATE	2	Eric Espenhorst 120 Avenue A, Suite D, Snohomish, Washington 98290 Agency: National Wildlife Federation/Thousand Friends of Washington/Transportation Choices Coalition	Now, I'd be inclined to give the benefit of the doubt, but I have two biological opinions from the National Marine Fisheries Service on projects sponsored by the Washington Department of Transportation and the King County Department of Transportation who are two of the lead entities on these EISs. And both of these projects: one in the Cedar River Basin, one in the Green River Basin are adversely harming Chinook salmon. Two of the three lead entities have proven that they are willing and able to harm Chinook salmon, and it's not acceptable that they might do it on such a massive scale.	Co-lead agencies are committed to avoiding harm to chinook salmon. Mitigation strategies have been prepared to promote protection.
T14	O	1	John Healy 1127 35th Avenue Seattle Agency: Thousand Friends of Washington/Sensible Solution for 405 Coalition	I, too, would like to thank the Department of Transportation and the co-lead agencies for all the work they have done. I think they have made all of our work much earier.	Thank you for your comment.

Code Number			Name	Comment	Response
T14	O	2	John Healy 1127 35th Avenue Seattle Agency: Thousand Friends of Washington/Sensible Solution for 405 Coalition	I will make just one point about the so-called Alternative 5, and that is that the bulk of Alternative 5 comes from within the existing alternatives in the DEIS, and therefore should not pose an enormous study challenge going forward. It is not -- this is a point that I think has been overlooked. It is not our intent to slow the process. It is our intent to achieve a responsible, affordable, effective, and environmentally sound result.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T15	ALT	1	Todd Woosley 10633 Southeast 20th Street Bellevue 98004 Agency: Northshore and Kirkland Chamber of Commerce; Seattle King County Assoc of Realtors	I'm here to speak on behalf of both the Northshore and Kirkland Chamber of Commerce which I'm a board member of both organizations. They both are in favor of the preliminary preferred alternative that was reached through the process.	Please see response to comment L6.ALT-1.
T15	ALT	2	Todd Woosley 10633 Southeast 20th Street Bellevue 98004 Agency: Northshore and Kirkland Chamber of Commerce; Seattle King County Assoc of Realtors	I'm also representing the over five thousand members of the Seattle King County Association of Realtors who are daily using the corridor in their business in helping people find homes. And that organization also supports the preliminary preferred alternative that was reached through nearly two years worth of process consensus building and then study that has just been completed in the draft Environmental Impact Statement that shows that that alternative, the preliminary preferred alternative, meets the statement of purpose and needs of reducing congestion and improving mobility which is the goal for the improvements on 405. It does that to the highest level of any of the alternatives.	For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please see response to comment L6.ALT-1.
T15	ALT	3	Todd Woosley 10633 Southeast 20th Street Bellevue 98004 Agency: Northshore and Kirkland Chamber of Commerce; Seattle King County Assoc of Realtors	Regarding the previous speaker's issue on environmental impacts, interestingly all the alternatives have roughly the equivalent environmental impact compared to the entire 405 project as it stands with existing and with the expansion. There's virtually no difference.	Chapter 3 of the I-405 Corridor Program Draft EIS provides a detailed evaluation and comparison of the effects of the action alternatives relative to existing conditions and/or the No Action Alternative. There are important differences in performance and environmental effects among the alternatives.

Code Number			Name	Comment	Response
T15	FATE	1	Todd Woosley 10633 Southeast 20th Street Bellevue 98004 Agency: Northshore and Kirkland Chamber of Commerce; Seattle King County Assoc of Realtors	But in any case, I think we all should be assured that whatever alternative is adopted and whatever is finally approved that the environmental impacts will be adequately mitigated through the requirement -- the DOT already has that commitment with the National Marine Fisheries Service. And I believe it's a red herring at this point.	Agencies including WDFW and NMFS will make a detailed project-level review of impacts and mitigation measures for each of the numerous actual construction projects included in the program. Please also refer to response to comment L38.FATE-1.
T15	ALT	4	Todd Woosley 10633 Southeast 20th Street Bellevue 98004 Agency: Northshore and Kirkland Chamber of Commerce; Seattle King County Assoc of Realtors	We should move on with meeting the statement of purpose in reducing congestion and improving mobility on the 405 corridor, and again I urge the executive committee to move forward supporting the Preliminary Preserved Alternative.	Please see response to comment L6.ALT-1.
T16	O	1	Bruce Nurse 10500 Northeast 8th Street, Suite 600 Bellevue, 98004 Agency: I-405 Corridor Program Citizens Committee	First, I want to commend the Washington State Department of Transportation for the work that they have done in this study during the past two years.	Thank you for your comment.
T16	O	2	Bruce Nurse 10500 Northeast 8th Street, Suite 600 Bellevue, 98004 Agency: I-405 Corridor Program Citizens Committee	This project -- it needs to be observed -- is the largest project that we've seen considered in this state, possibily the western states to date, considering a 30 mile corridor with upwards of 28 or 29 interchanges, 6 or 8 intersections with state highways and interstate highways. The magnitude of this project is far beyond any of the things that the public has dealt with in the past. And because of this, we have produced a $7.7 billion cost for the Preliminary Preferred Alternative, which is a cost that I would argue is very much in perspective for the performance of the corridor under this alternative, both environmentally and in terms of transportation capacity.	Thank you for your comment.

Code Number			Name	Comment	Response
T16	PPA	1	Bruce Nurse 10500 Northeast 8th Street, Suite 600 Bellevue, 98004 Agency: I-405 Corridor Program Citizens Committee	Environmentally, we were advised during the study process by the consultants that all of the alternatives, if implemented, would improve the environment in the corridor. The data brought forward showed that the Preliminary Preferred Alternative 3 had less environmental impacts in many areas, if not most areas, that were analyzed.	The preliminary preferred alternative was a non-binding polling of the Executive Committee based on information provided in the available expertise reports and preliminary feedback from the Steering Committee and Citizens Committee. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. Chapter 3 of the I-405 Corridor Program Final EIS provides the best and most detailed evaluation and discussion of the environmental effects of the action alternatives. It is a goal of the I-405 Corridor Program to maintain, protect, and enhance the functions of fish and wildlife habitat, wetlands, and other waters of the state through restoration, creation, and enhancement. To help achieve this goal, WSDOT has prepared and is implementing a proposed early-action environmental impact mitigation decision-making process. A discussion of some of the tradeoffs that must be considered is included in Sections 3.24 and 3.25 of the I-405 Corridor Program Draft EIS.
T16	O	3	Bruce Nurse 10500 Northeast 8th Street, Suite 600 Bellevue, 98004 Agency: I-405 Corridor Program Citizens Committee	The significance of looking at these alternatives in composite and evaluating them carefully gives us the proper balance between our additional transportation capacity mobility for all modes of travel and purposes. And this is what I believe has been clearly achieved in Alternative 3.	Thank you for your comment.
T17	O	1	Marsha Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	I'm basically concerned about spending more money on concrete. These are the reasons I'm against building more concrete lanes in general for 405: If you build it they will come. More traffic lanes make more traffic to come to fill up those lanes. We need an alternative mode of transportation that's really workable, something different than cars going up and down 405.	The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3 - Mixed Mode Emphasis. Both bus rapid transit in the I-405 corridor and non-motorized improvements are evaluated and proposed as part of Alternative 3 and the Preferred Alternative. Also, please refer to the response to comment E66.SOL-1.
T17	TR	1	Marsha Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	The road we have now is empty for a number of hours each day. Even as horrible as rush hour is, there are times in the middle of night when that road is empty. If we had some kind of rail or separated bus lane that could just carry the people on a continual basis without having to have unused capacity, or not enough capacity, depending on the hour of the day, that would be much better.	The study committees adopted criteria that emphasized improvements in peak (rush hour) period conditions.

Code Number			Name	Comment	Response
T17	COST	1	Marsha Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	It costs too much to put more concrete down.	Thank you for your comment.
T17	O	2	Marsha Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	We need better use of the infrastructure we already have by making better use of the bus and other public transportation alternatives available.	The Preferred Alternative includes a balanced investment in transit, roadway, and demand management strategies, including a bus rapid transit system that will use much of our existing HOV infrastructure.
T17	SOL	1	Marsha Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	We need to have a public transport system in place on the east side to integrate with anything that Sound Transit might get off the ground on a regional level, if and when that would ever happen.	The Preferred Alternative includes a balanced investment in transit, roadway, and demand management strategies. The program is designed to mesh with Sound Transit regional solutions throughout the region.
T17	TR	2	Marsha Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	There will always be a bottleneck somewhere, unless you have a dedicated roadway such as rail, either monorail or bi-rail or a separated bus lane.	The Preferred Alternative improves all of the major bottlenecks along I-405 and provides priority movement for transit and HOV throughout the corridor.
T17	O	3	Marsha Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	We just finished a widening project on the Bellevue North Creek portion of 405, and now we are going to have another one.	Thank you for your comment.
T17	O	4	Marsha Stedman 18715 92nd Ave NE Bothell, WA 98011 Agency: Public	The single passenger car, my last point, is a tremendous waste of resources: steel, oil, gas, concrete, and our air being polluted.	Thank you for your comment.
T18	O	1	Tim Gould 4411 Woodland Park Avenue North Seattle Agency: Public	The thing about Interstate 405, it was originally constructed to be a bypass to Seattle; and, of course, we all see what's happened. It's been nothing but a magnet for sprawl. And the more you try to expand it, the more development that's going to prompt. And that's why I'd really like to look very seriously at an alternative that would move more people with less concrete.	The I-405 Corridor Program is being proposed in response to growth that already has occurred within the study area. Accommodation of planned regional growth also is part of the adopted program purpose that has guided alternatives development, as identified in Section 1.3 of the I-405 Corridor Program Draft EIS. Also, please refer to the response to comment E66.SOL-1.
T18	SOL	1	Tim Gould 4411 Woodland Park Avenue North Seattle Agency: Public	And in particular I would like to see a serious consideration of what's known as Alternative 5 as proposed by Sensible Solutions to 405. This is a plan that would cost considerably less than what the DOT's Preferred Alternative would cost. And also because of greater reliance on public transportation, we don't endure the agony of 10 to 18 years of construction that the preferred alternative would have.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Also, a preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. The Preferred Alternative is similar to Alternative 3 - Mixed Mode Emphasis. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
T18	TR	1	Tim Gould 4411 Woodland Park Avenue North Seattle Agency: Public	Furthermore, I don't seem to see any serious plans for how you deal with the impacts and how you mitigate that with greater public transportation. To provide the kind of transit that would be needed to overcome those impacts from construction, you pretty much have solved a good part of the problem during the commute period. And that's why I feel that that's a much better approach. It costs less, it addresses the major problem.	The FEIS includes additional information on likely mitigation for the Preferred Alternative. The Preferred Alternative includes a substantial commitment to public transportation, and expanded transit service is likely to be a major component of the construction mitigation program. The analysis shows that public transportation investment alone will not meet the purpose and need of the program, and therefore a balanced approach is reflected in the Preferred Alternative.
T18	SOL	2	Tim Gould 4411 Woodland Park Avenue North Seattle Agency: Public	The previous speaker pointed out there are certain times of day where 405 doesn't really have that much traffic. It's not quite the point of, like, I-5 is where it's busy all of the time, every day, and therefore, when you can move people when they want to be traveling at peak times by providing added capacity for buses, also use the existing BNSF corridor, also called dinner train, for either some kind of rail transit or perhaps use that corridor for an express bus service.	The Preferred Alternative includes a balanced investment in transit, roadway, and demand mangement strategies. The Executive Committee sent a letter to the appropriate agencies in support of preserving the BNSF rail right-of-way for future transportation use, which could include transit.
T18	SOL	3	Tim Gould 4411 Woodland Park Avenue North Seattle Agency: Public	That would be certainly a very cost-effective way to move people. It's going to cause a lot less environmental impact, and I feel that that is a superior plan and you should give that very serious consideration before embarking on pouring more concrete.	The environmental effects of the rail transit system you propose within the BNSF corridor would be similar to those discussed in the I-405 Corridor Program Draft EIS for Alternatives 1 and 2, which include a high-capacity transit system potentially using some form of rail technology within portions of the BNSF right-of-way. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Also, please refer to the response to comment E66.SOL-1.
T19	ALT	1	Suzette Cooke Agency: Public	I prefer Alternative 3 for the following reasons: basically because I think it adds a practical component for the general capacity for vehicles. The jobs that I have held over the last 30-some years have been jobs that require me to transport both myself, alone, as well as other people. I've needed my car on the job site.	Please see response to comment L12.ALT-1.
T19	O	1	Suzette Cooke Agency: Public	I also believe that from a practical sense when we look at the cost of goods and services, so many of the services that we all depend on it is a single person in that vehicle, whether it's a plumber or somebody who is providing work at another site. It's not practical to look at them using the transit system.	Thank you for your comment.

Code Number			Name	Comment	Response
T19	TR	1	Suzette Cooke Agency: Public	And currently the neighborhood arterials are being impacted so bad, way past what we consider the I-405 corridor. What's impacted because of I-405 congestion is beyond the lines that you show or the photographs that are depicted here because people are looking for other alternatives to get to locations. So neighborhoods are being impacted.	The Preferred Alternative will result in reduced overall travel on arterials and neighborhood streets.
T19	O	2	Suzette Cooke Agency: Public	And I think one of the environmental issues is perhaps more of a personal one, but I think for the mental health of all of those of us who are commuters is something that should be addressed in the EIS. The way things are now is unacceptable, and we're going to wreak some negative elements of that further if we don't do something from, again, a practical nature of increasing capacity.	Analysis and discussion of the mental health of commuters is outside the scope of this EIS.
T19	TR	2	Suzette Cooke Agency: Public	And finally for the emergency vehicles. While we all know we are supposed to be polite and let them through, there are times on 405 that that is not possible.	Thank you for your comment regarding emergency vehicles.
T19	ALT	2	Suzette Cooke Agency: Public	So for that, I support Alternative 3, including the assistance on the expansion of Highway 167.	Please see response to comment L12.ALT-1.
T20	SOL	1	Peter Rimbos 19711 241st Avenue Southeast Maple Valley Agency: Public	I use 405 and I encourage the evaluation of other solutions, other than the Preferred Alternative, Alternative 3.	The I-405 Corridor Program Draft EIS considered and evaluated a wide range of potential solutions, transportation improvements, and alternatives in addition to Alternative 3 - Mixed Mode Emphasis, as discussed in Chapter 2 of the Draft EIS. Also, please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
T20	O	1	Peter Rimbos 19711 241st Avenue Southeast Maple Valley Agency: Public	We know from current and past experience from other communities that we cannot really grow our way out of traffic congestion. I was originally born and raised in New York City. I have an all awful lot of understanding of what happens with traffic congestion, how you can't get out of it and how mass transit can really help us.	Thank you for your comment.
T20	SOL	2	Peter Rimbos 19711 241st Avenue Southeast Maple Valley Agency: Public	I feel that the only long-term solution short of population depression is to implement a variety of forms of mass transit. One is the most sufficient and economical in terms of dollars per mile to move masses of people, and we're talking about a large mass of people here in our geographically constrained area. It does require long-term investments in the roads and -- long-term massive investments in the roads -- and it also allows accommodation of growth in the long-term.	Thank you for your comment.

Code Number			Name	Comment	Response
T20	SOL	3	Peter Rimbos 19711 241st Avenue Southeast Maple Valley Agency: Public	Critics of mass transit say people don't use it. Today that's true. People do no use it enough. However, why not endeavor to resolve this dilemma of not using mass transit instead of ignoring mass transit as a true long-term solution. Some of the reasons people give is that it's not convenient. It doesn't go where I want to go. It's not economical. It takes too much time to switch between buses or between different modes of transportation, and there are not enough buses, trains, et cetera. Why not fix these problems first? Try to address getting more buses, trains, monorail, light rail, HOV lanes, rights-of-way, trip reduction centers, vanpools, carpools, et cetera, first.	Thank you for your comments regarding public transportation.
T20	SOL	4	Peter Rimbos 19711 241st Avenue Southeast Maple Valley Agency: Public	I know these are part of the alternatives, but I would do that first to better use the money and try to get something done real quickly. I think we should do this before sealing our fate by overbuilding roads and exacerbating traffic congestion by encouraging even more single occupancy vehicles because once we build more roads and we do fill them up with more vehicles that are just one person, we will just keep continuing that problem. It will keep growing.	Thank you for your comment.
T20	SOL	5	Peter Rimbos 19711 241st Avenue Southeast Maple Valley Agency: Public	In addition, I encourage solutions be implemented to eliminate the bottleneck interchanges on 405, 567, I-90 and 520. For example, when I travel south on I-405 and approach 167 going south, I notice backups that go two, five, sometimes seven miles, depending on the time of the day. All these occur because of the offramps of 405 and the entrance ramps onto 167. In some cases the traffic is two lanes wide because it's so backed up. Why not fix these problems first, so that we can reduce traffic congestion?	The Preferred Alternative includes improvements to all of the major bottlenecks along I-405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
T20	SOL	6	Peter Rimbos 19711 241st Avenue Southeast Maple Valley Agency: Public	In conclusion, please consider my concerns about the Preferred Alternative and a more reasonable and less expensive near-term doable solution: 1) mass transit, 2) interchange integration -- solutions that will not further encourage sprawl into our rural areas where I live. I believe Alternative 5 could be a real solution and should get serious consideration.	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3 - Mixed Mode Emphasis. Also, there is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
T21	O	1	Therese Casper 766 Thomas Street Seattle 98109 Agency: Livable Communities Coalition/Sensible Solutions for 405 coalition	First off, I want to thank Wash-dot for holding these hearings. This is really an important chance for the community to respond to the Draft Environmental Impact Statement. Public projects take many many years, and this is just the beginning because we haven't even gotten to construction yet. So we are grateful to have this opportunity to give comment.	Thank you for your comment.
T21	TR	1	Therese Casper 766 Thomas Street Seattle 98109 Agency: Livable Communities Coalition/Sensible Solutions for 405 coalition	I think we can all agree that 405 needs improvements. I don't use 405 as a commuter, personally; but I do use it as a recreational user on the weekends or when I need to run errands on the east side. And it's definitely congested at many different times of day, not just commuting hours, so I know that we can all get frustrated.	Congestion has been worsening throughout the weekdays and on weekends over the past few years.
T21	COST	1	Therese Casper 766 Thomas Street Seattle 98109 Agency: Livable Communities Coalition/Sensible Solutions for 405 coalition	But I think some of the current proposals we can't really afford, and some of them won't work, so I want to speak to those two points. In terms of not being able to afford them, as we all are aware there are many, many transportation projects that need to happen in the whole Puget Sound region. And so we really need to be strategic in using those dollars and, you know, we have -- a lot of anti-tax initiatives have happened, and I'm really concerned that we're not going to be able to tax our way to building all of these projects.	Thank you for your comment.
T21	SOL	1	Therese Casper 766 Thomas Street Seattle 98109 Agency: Livable Communities Coalition/Sensible Solutions for 405 coalition	So that's definitely a concern. And I know Wash-DOT is aware and hopefully a lot of the people in the room are aware of the Sensible Solutions for 405 Alternative, Alternative 5, which is about half the cost of the current Preferred Alternative. So I encourage people to look at that, and I urge Wash-DOT to consider that.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Also, a preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. The Preferred Alternative is similar to Alternative 3 - Mixed Mode Emphasis. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
T21	TR	2	Therese Casper 766 Thomas Street Seattle 98109 Agency: Livable Communities Coalition/Sensible Solutions for 405 coalition	In terms of not working, as the saying goes, "If you build it, they will come." We know from many studies and many experiences across the country that adding general purpose lanes to highways does not reduce congestion. It just encourages more people to come and use the road because now there's no congestion and then it just gets filled up with more and more people and it actually encourages driving; some studies have shown that.	The travel forecasts account for a substantial amount of the induced travel indicated in your comment. Please refer to the response to comment E66.SOL-1 for a further discussion of induced travel.
T21	TR	3	Therese Casper 766 Thomas Street Seattle 98109 Agency: Livable Communities Coalition/Sensible Solutions for 405 coalition	In addition, there is a new study that just came out that I would like to leave with the panel that shows that cities that concentrate on road building do not -- are not any more successful in terms of lowering long-term congestion levels than cities that have fewer lane miles and concentrate more on transit. So I think that's something that needs to be looked at.	The travel forecasts account for a substantial amount of the induced travel indicated in your comment. Please refer to the response to comment E66.SOL-1 for a further discussion of induced travel.
T21	LU	1	Therese Casper 766 Thomas Street Seattle 98109 Agency: Livable Communities Coalition/Sensible Solutions for 405 coalition	Also land use is a very important consideration, and since I'm running out of time I won't go into that too much. But just our traditional land-use patterns are causing sprawl, and we need to look at more mixed-use development.	See responses to comments L27.LU-1 and L53.LU-4.
T22	TR	1	George Hadley 1401 Southwest 172nd Normandy Park Agency: Public	But I think that I found the critical data buried in one of the charts over here called Environmental Effects Compared to Transportation Performance chart. In the middle figure on that chart is the number of hours per day of congestion in 2020. Showing that Alternative 1 and Alternative 0 have about 7 hours a day, that gets reduced by Alternative 4 down to about four-and-a-half hours per day. That's in 2020, after I-405 has been destroyed for 17 years by construction.	Only portions of I-405 will be under construction over a period of years, depending upon funding. The benefits after construction will be substantial, as documented in the DEIS.
T22	TR	2	George Hadley 1401 Southwest 172nd Normandy Park Agency: Public	I would like to see an alternative that reduces that down to zero, and I would like to know how many lanes that would take. What do we have to do to build the roads to get rid of our congestion, including things like building I-605?	None of the alternatives totally eliminate congestion, but some are able to improve conditions compared to today while carrying substantially more people and vehicles.

Code Number			Name	Comment	Response
T22	TR	3	George Hadley 1401 Southwest 172nd Normandy Park Agency: Public	Get those people that have no interest going anywhere near Bellevue and Everett and Renton, get them out of there. Get them someplace else, let them go from Tacoma to Arlington some other way.	Improvements to I-405 will facilitate use by a wide variety of travelers. I-405 will not solve all of the mobility needs within the Puget Sound region.
T22	ALT	1	George Hadley 1401 Southwest 172nd Normandy Park Agency: Public	I don't particularly characterize Alternative 1 as a nearly pure transit solution, whereas the other three vary from the mostly transit down to a fair amount of transit. Where is the general purpose lane solution?	Alternative 4 - General Capacity Emphasis, would provide the greatest increase in general purpose capacity of the four action alternatives. Please refer to Section 2.2.5 of the I-405 Corridor Program Draft EIS for a description of this alternative.
T22	O	1	George Hadley 1401 Southwest 172nd Normandy Park Agency: Public	I as a member of the public have been listening to this transit stuff for years, thinking, "Well, if I support transit, all of those other people will get out of their cars, and they'll take transit so I can drive." And unfortunately people are thinking that I'm going to get out of my car so they can drive if they support transit. At some time, people are going to figure out that I'm not going to get out of my car, and they're not going to get out of their car. We've got to build the roads. And when the general populace figures that out, all those peoples that have running on transit, they're going to be unelectable.	Thank you for your comment.
T22	SOL	1	George Hadley 1401 Southwest 172nd Normandy Park Agency: Public	We've got to build the roads. We spent 15 years now adding transit, taxing for transit. Build the roads.	Thank you for your comment.
T22	O	2	George Hadley 1401 Southwest 172nd Normandy Park Agency: Public	And so -- and I think the last thing, I think you guys need to consider how much your plans will be affected when that zombie that's Sound Transit Light Rail is finally declared dead.	Sound Transit is one of the co-lead agencies for the I-405 Corridor Program Draft EIS, thus ensuring that its planning and proposals are considered within the larger I-405 Corridor Program.
T23	ALT	1	Aisling Kerins Agency: WASHPIRG	We do not support the Preferred Alternative for several reasons, but primarily because building four more lanes is not going to solve the traffic problems, and at the same time it's going to increase sprawl and air pollution.	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3 - Mixed Mode Emphasis. Please refer to the response to comment E66.SOL-1.
T23	SOL	1	Aisling Kerins Agency: WASHPIRG	We do support Alternative 5 presented by the Sensible Solutions for 405.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
T23	TR	1	Aisling Kerins Agency: WASHPIRG	Last fall we released a report called "Breaking the Gridlock" which found that building new roads often does not necessarily alleviate traffic congestion, and it actually brought more traffic to those roads. Based on a study done by the Texas Transportation Institute that surveyed 70 different urban centers over the course of 15 years, I would like to submit that report to you as well. It just gives countless examples across the country.	With respect to the "Breaking the Gridlock" report, our review of the underlying Texas Transportation Institute data and discussions with TTI staff showed relatively weak relationships between various indicators of added capacity (e.g., lane miles, lane miles per capita) and congestion (e.g., the TRI index in the TTI studies). While the report that you cited did a credible job of extracting and analyzing certain data for the purposes of its study, it is also clear to us that there are many confounding factors within the TTI database that could also lead to other conclusions. Please also see the response to comment E66.SOL-1 related to induced travel.
T23	TR	2	Aisling Kerins Agency: WASHPIRG	Here in Washington a local example of this is, as development increased on the east side of Lake Washington, the Department of Transportation increased the capacity of one of the I-90 floating bridges to hopefully alleviate traffic. Taxpayers spent $1.4 billion on a 6.9 mile project. The first month that the newly-added lanes were put to use, cars traveling over the bridge jumped from 65,000 cars per day to 104,000 cars per day. The Department of Transportation then surveyed arterial options such as the 520 bridge and SR-522 and found that traffic hadn't decreased in those areas, therefore showing that the increase was new encouraged driving. So I would just like to promote the idea that building new roads is not going to alleviate our traffic congestion problems.	We have not analyzed historical effects on the I-90 corridor in association with other roads within the region. However, the I-405 Corridor Program acknowledges that induced travel will occur in response to transportation improvements. Most of these effects have been accounted for in the I-405 travel forecasts. Please also see the response to comment E66.SOL-1 related to induced travel.
T23	SOL	2	Aisling Kerins Agency: WASHPIRG	We do support Alternative Five, which encourages smart growth, trip reduction programs, and transportation options. And these are things that are from the report outlined as the most effective ways to really address traffic congestion. That's it.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

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T24	SOL	1	Jack Whisner 66 Bell Street Seattle, Washington Agency: Board of Transportation Choices Coalition	I'm here tonight supporting the Sensible Solutions Alternative, which has been nicknamed Alternative 5.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Also, please refer to the response to comment E66.SOL-1.
T24	TR	1	Jack Whisner 66 Bell Street Seattle, Washington Agency: Board of Transportation Choices Coalition	I want to focus on two things on how the preferred alternative is inadequate: 1) that there is inadequate consideration of pricing of new roadway space, and 2) on the design of the transit alternative itself.	See response to your later comments.
T24	TR	2	Jack Whisner 66 Bell Street Seattle, Washington Agency: Board of Transportation Choices Coalition	This region dealt successfully with a couple of crises about twenty years ago. One was on electrical generation and second on solid waste. And pricing played a critical role in both of those. We are not going to repeal the law of demand. And the transportation system is in crisis because we don't price roadway space, and the models used to test the four alternatives model didn't include roadway pricing.	The Executive Committee recommended further consideration of congestion pricing as part of a regional strategy.
T24	TR	3	Jack Whisner 66 Bell Street Seattle, Washington Agency: Board of Transportation Choices Coalition	Now, the revenue from such pricing could be used for two very useful things: 1) for long-term maintenance of the roadways which is not funded now, and 2) could provide revenue to provide for frequent transit service which is a second-best solution arguing against roadway pricing. That is the equity concern that low-income auto users would be priced out.	Pricing was recommended by the Executive Committee for consideration at a regional level. It is not included specifically in the Preferred Alternative.
T24	ALT	1	Jack Whisner 66 Bell Street Seattle, Washington Agency: Board of Transportation Choices Coalition	As far as the transit that's been modeled in the four alternatives, I think the first two have high capacity transit and were flawed in that they were too extensive, too costly, and focused too much on transit investment and frequency and capital in the freeway network, itself. I think it shows a misunderstanding of what transit can do and how it should be designed. Transit is best used to extend the range of pedestrians, to provide pedestrians with access to activity centers, and to provide an alternative to traffic congestion. It has nothing and no power to help reduce traffic congestion;	The BRT system in the Preferred Alternative will be focused on the I-405 corridor rather than the BNSF.

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T24	O	1	Jack Whisner 66 Bell Street Seattle, Washington Agency: Board of Transportation Choices Coalition	in fact, I think reducing traffic congestion is an inappropriate maxim for this whole exercise. What we should be doing is attempting to improve mobility of freight, goods and people, and not cars.	Development of the purpose and need for the I-405 Corridor Program was based on extensive review of other studies, supplemental research, and deliberation by the study committees and co-lead agencies before its final adoption. As discussed in Section 1.2 of the I-405 Corridor Program Draft EIS, improving mobility of freight, goods, and people is part of the identified need for the I-405 Corridor Program. Section 1.2 also documents why reduction of foreseeable traffic congestion is an important part of the purpose and need for the I-405 Corridor Program.
T24	SOL	2	Jack Whisner 66 Bell Street Seattle, Washington Agency: Board of Transportation Choices Coalition	The transit alternative, the first thing included should be the Burlington Northern Santa Fe interchange track which would provide a frequent, reliable transit north-south line that would go from Woodinville to Renton and connects several important activity centers on the east side. The transit service that's in the freeway HOV lanes like that of Alternative 3 will be infeasible because they'll be choked on east-west arterials as they attempt to go from the center HOV lanes to the activity centers. Transit in the Burlington Northern right-of-way will not have that problem.	Alternative 1 - HCT/TDM Emphasis, and Alternative 2 - Mixed Mode with HCT/Transit Emphasis, both include a physically separated, fixed-guideway high-capacity transit system potentially using some form of rail technology within portions of the BNSF right-of-way. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
T25	ALT	1	King Parker Agency: Renton City Council	Whatever the case is, it's -- we're more than likely recommending in favor of Alternative 3. Of course, if I had my own druthers, I could think of a whole host of different things that I'd like to see done, other than that. But I think it's very important that we all put some consensus in to what is going to be the best alternative for the next twenty years. And I think Alternative 3 provides it.	Please see response to comment L12.ALT-1.

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T25	SOL	1	King Parker Agency: Renton City Council	The second item I wish to bring to the board's attention is the Burlington Northern right-of-way. City of Renton, its citizens, and the council, and the mayor, as well, are opposed to any type of mass transit or rail transit or any kind of transit that would be used for that particular right-of-way. We think -- or I feel very strongly, speaking for myself -- that you need to focus on the 405 corridor; and other and secondary routes and one thing or another at this time that are really not practical, should be not even included.	The bus rapid transit (BRT) system in the Preferred Alternative will be focused on the I-405 corridor rather than the BNSF. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
T25	SOL	2	King Parker Agency: Renton City Council	I am not interested in seeing our city -- and I'm talking about the downtown core area of Renton -- being split by a transit system. It's just not fair to our community. And then, of course, you also have the impacts to the neighborhoods. So please take that into consideration.	Thank you for your comments regarding community and neighborhood impacts.
T26	SOL	1	Tim Hesterberg Agency: Sierra Club	If we could just add lanes to 405 and have everything else be the same, that would be great, reduce congestion on that road.	Thank you for your comment.
T26	TR	1	Tim Hesterberg Agency: Sierra Club	But the experience nation and worldwide shows that doesn't happen. Adding capacity makes people drive more and 10 percent increased capacity causes a 9 percent increase in traffic. One of the things we expect to see here is people driving further, longer distances to get to cheaper housing further away.	Please refer to the response to comment E66.SOL-1.
T26	ALT	1	Tim Hesterberg Agency: Sierra Club	That and the other effects of this project, Preferred Alternative 3, would cause loss of salmon habitat, increase in impervious surfaces which also harms salmon, increased traffic in the neighborhoods, noise in the neighborhoods, air pollution, and so on.	A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. The Preferred Alternative identified in Chapter 2 of the Final EIS is similar to Alternative 3 - Mixed Mode Emphasis. Also, please refer to the response to comment E66.SOL-1.
T26	COST	1	Tim Hesterberg Agency: Sierra Club	Moving on to cost. $8 billion cost for Alternative 3, before cost overruns and interest, this costs about $50 thousand per family in this area. It's just incredible.	In 1997 there were about 219,300 households within the study area with forecasts to increase to 325,300 in 2020. Based on an estimated cost of about $7 billion for Alternative 3 and about 225,000 households in year 2000, the annual cost per household would be about $1,555. Based on a study area population estimated at 592,000 for year 2000, the $7 billion expenditure equates to about $590 per person per year. For comparative purposes, there are currently about 3.2 million people in the four-county Puget Sound region with annual public funding for transportation at $2 billion, or $625 per person per year.

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T26	O	1	Tim Hesterberg Agency: Sierra Club	And that leads me to the third point, which is realism. We want a fix here. We all want something to happen. But an $8 billion project that focuses just on roads is not going to be achievable in our political community. What we would be facing is everybody who fought against I745, 90 percent for road solution, would be opposing this, and everybody who objects to paying the bill would be opposing this.	Chapter 2 of the I-405 Corridor Program Draft EIS provides a description of each of the alternatives, the improvements and modal elements contained in each, and their anticipated costs. All alternatives are still under consideration at this time. Also, please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
T26	SOL	2	Tim Hesterberg Agency: Sierra Club	What we need is a balanced solution, combination of some lane capacity and a variety of other measures which are quite a bit cheaper ways to meet transportation demands. We need smarter, cheaper, faster, more effective solutions, and I urge you to consider Alternative 5.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. Please refer to the response to comment E66.SOL-1.
T27	ALT	1	Dick Burkhart Agency: Rainier Valley Transit Advisory Council and steering committee / People for Modern Transit	I come to speak in strong opposition to Alternative 3.	Please see response to comment E255.ALT-1.
T27	SOL	1	Dick Burkhart Agency: Rainier Valley Transit Advisory Council and steering committee / People for Modern Transit	I support elements of Alternatives 1 and 2 and the Sensible Solution Alternative.	Thank you for your comment.
T27	SOL	2	Dick Burkhart Agency: Rainier Valley Transit Advisory Council and steering committee / People for Modern Transit	I think what this system really needs, when we look at the long run, is high capacity, regional public transit. We're going to have a start on that, looks like probably starting next summer the Sound Transit Lightrail. We'll be getting going, and I think putting something along I-405 will be part of the regional system. We could have the lightrail coming from Sea-tac where it's already going, to Tukwila, to Renton, to Factoria, downtown Bellevue, Kirkland, out to Woodinville, Bothell;	Alternative 1 - HCT/TDM Emphasis, and Alternative 2 - Mixed Mode with HCT/Transit Emphasis, both include a physically separated, fixed-guideway high-capacity transit system potentially using some form of rail technology within portions of the BNSF right-of-way. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose

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				we need to go along the I-405 general corridor, but we need to hit the regional centers -- the cities -- and have the lightrail go right into those cities because that's where people will use it. That's were it will promote development, we'll get good transit development. As someone said earlier, people will use it. It will be an extension of walking, it won't be just like the freeway monorail concept where very few people use it.	mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. Alternative 3 - Mixed Mode Emphasis, would implement a high-capacity transit system throughout the study area using bus rapid transit (BRT). The I-405 Corridor Program is not currently considering a freeway monorail concept. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
T27	O	1	Dick Burkhart Agency: Rainier Valley Transit Advisory Council and steering committee / People for Modern Transit	And we need to look at what's going to happen in the future when oil prices go up. It's not going to be just congestion that's going to be a constraint. Costs are going to go up for driving, and we need to build this alternative with buses feeding into these different transit centers along the way.	It is outside the scope of this EIS to speculate on the future of oil prices. Each of the action alternatives includes an increase in transit service ranging from 50 percent up to 100 percent that would include feeder bus service to transit centers appropriate to the regional transit system.
T27	O	2	Dick Burkhart Agency: Rainier Valley Transit Advisory Council and steering committee / People for Modern Transit	And I think, also, Alternative 3 -- I don't think it's going to pass. It's going to be very expensive. People in Seattle where I live aren't going to vote for it. A lot of people in the suburbs, because of the cost, won't vote for it. So we need something more practical.	Thank you for your comment.
T27	SOL	3	Dick Burkhart Agency: Rainier Valley Transit Advisory Council and steering committee / People for Modern Transit	And, again, I think we need to look especially at some of the issues regarding pricing that were mentioned earlier. If you have congestion pricing or impose costs, parking, things like that, people will start to realize the true cost of driving. Then transit, public transit, in connection to those will start to look a lot more practical for people.	Pricing was recommended by the Executive Committee for consideration at a regional level. It is not included specifically in the Preferred Alternative.
T28	O	1	Dan Clawson Agency: Renton City Council	I think this is really kind of a -- what we've got here that is something of a political problem. We need to have support for whatever we're going to do.	Thank you for your comment.
T28	ALT	1	Dan Clawson Agency: Renton City Council	And it's true that people are not going to stop driving. They are not going to all get in their cars. And the reason that the Renton City Council and the people of Renton that I've talked to -- and I've talked to a lot of people who support Alternative 3 -- is that it does both. We are expanding highways, and yet we're expanding bus routes, too. And I think that's what we need.	Please see response to comment L12.ALT-1.

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T28	TR	1	Dan Clawson Agency: Renton City Council	Putting in the additional lanes is not going to solve all the traffic. It's never going to be like it was twenty years ago when you get on the freeway and zip around, but it does -- I can look out my window every day at 405, and about 3:30 the traffic stops going southbound. This is a real problem for business owners.	Thank you for your comment regarding the degradation of traffic conditions. The Preferred Alternative is designed to provide a multimodal solution to congestion and other mobility problems in the I-405 corridor.
T28	SOL	1	Dan Clawson Agency: Renton City Council	When I can, I'll take the bus, but a lot of times I simply can't. I have an 80-year-old mother. I can't hardly get on the bus and take her somewhere, you know. It's just not practical. I've got a dog. We've got grandchildren. I think it's just very typical of a family. Everybody's just not going to get on the bus, and -- unfortunately -- but we're going to need to do both, and I think this is a good balance of transit and lanes.	Thank you for your comment.
T28	SOL	2	Dan Clawson Agency: Renton City Council	Want to make a comment on the Burlington Northern right-of-way. The Council has taken the position we're not opposed to the purchasing of the right-of-way. We don't want it used for high-capacity trains. There is just too much opposition. I would say that we don't know that trains are really the best technology in any situation, but that's very clearly the position of the Renton City Council. And at this time we are not interested in having the Burlington Northern right-of-way used for high-speed transit.	Thank you for your comment.
T28	ALT	2	Dan Clawson Agency: Renton City Council	So that's really -- I don't have really prepared comments here; but, again, there's been a lot of planning going into this Alternative 3. I think it's the best way to go, and I think we need to get behind it and push it and get it built.	Thank you for your comment.
T29	O	1	Tim Clark Agency: Public	Certainly I concur that there has to be support for alternative transportation as today's system is nowhere close to beginning to actually deal with the congestion problem.	Thank you for your comment.
T29	SOL	1	Tim Clark Agency: Public	But I would -- first thing I would like to do is simply dispel the concept of I605 even as a concept, and you can trash that one now. The reason I say that is one of the areas that I served on a number of committees is in the Endangered Species Act. And one of the things that was discovered if you look at very little known tri-county committees 4D plan is a road-maintenance program that requires that you especially are concerned not only about building the roads but of road runoff, and its impact on the environment. And I'll tell you point blank, the concept of 605 going through an area that already is relatively pristine and protected and to think about trying to build roads there is never even going to see the light of day. That one is dead.	Development of a new east King County freeway corridor was not advanced for further consideration as part of the I-405 Corridor Program for the reasons discussed in Section 2.2.7 of the I-405 Corridor Program Draft EIS. This does not preclude future consideration of a rural King County freeway as part of another study.

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T29	TR	1	Tim Clark Agency: Public	The other problem, though, that probably is illustrated by that though is the point about the problem, 405. That is, the congestion is there because the people are already there, and if you're not going to get a 605, and you're not, then it means you have to deal with congestion and the housing development as it already currently exists.	Thank you for your comment about dealing with congestion caused by current and future growth in the I-405 corridor.
T29	LU	1	Tim Clark Agency: Public	And there only becomes one of two possibilities: One, you start to lift the growth management line and start to shove that back, saying, "Well, we'll just try it. Get a little more density there," of which I would suggest you're also going to encounter tremendous resistance to that. That one choice we as a society made way back in 1991 is we are going to manage growth; and growth is, of course, the attempt to try and stop sprawl. And sprawl is basically eating up the natural resources which is why when you chose growth management you chose greater dessification. The impact of that is once you do that then you have to start implementing the infrastructure that supports that. So to find an easy out, obviously moving the growth management line, all you've done is stall off the problem. You're still going to have to solve it.	The I-405 Corridor Program and WSDOT do not have any authority to determine the location of the growth management line (Urban Growth Boundary). That is the role and responsibility of the regional and local governments. The I-405 Corridor Program implements a transportation infrastructure called for within the UGA to serve the urban densities and reduce potential for "sprawl".
T29	SOL	2	Tim Clark Agency: Public	So to summarize, I guess you would say that I am in support of the Preferred Alternative.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
T29	SOL	3	Tim Clark Agency: Public	I would oppose any movement of the growth management line, and I think that we're going to have to accept that urbanization is what we chose.	Changes to the region's Urban Growth Area boundaries are outside the scope of alternatives being considered in this EIS. Please refer to the response to comment C13.SOL-1.
T30	SOL	1	Nick Hein Boulevard Lanes neighborhood near Fairwood Agency: Public	For the other people who want to use the roads, who want unrestricted use of single occupant vehicles, I say if you're going to live on the road, you should pay the rent, and that our transit system should move people most efficiently, not cars. Our payment for the transit system should make the most efficient use of the taxpayer dollars, not generate profit the most efficiently for contractors, car dealers, oil companies. It's our money. I want to see a transit system that makes the best use of our money.	The Preferred Alternative is designed to provide a multimodal solution to congestion and other mobility problems in the I-405 corridor. Transit is a major component of that solution.
T30	SOL	2	Nick Hein Boulevard Lanes neighborhood near Fairwood Agency: Public	A transit system would take up a smaller footprint than massive roads and congestion that we already have. Granted, we need the combination of all modes of transit, but we need all modes to be a realistic choice.	The Preferred Alternative is designed to provide a multimodal solution to congestion and other mobility problems in the I-405 corridor. Transit is a major component of that solution.

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T30	O	1	Nick Hein Boulevard Lanes neighborhood near Fairwood Agency: Public	We now have a complete and continuous system of roads for single occupant vehicles, for commercial vehicles; but we have a completely fragmented and inadequate bus system, bicycle system, pedestrian system. To say that people aren't going to use those systems is simply unfair and ignores the fact that the alternatives have not been planned for.	The Preferred Alternative is designed to provide a multimodal solution to congestion and other mobility problems in the I-405 corridor. Transit and nonmotorized modes are included in that solution.
T30	TR	1	Nick Hein Boulevard Lanes neighborhood near Fairwood Agency: Public	Finally, I call into question any of the numbers in the studies here on the basis of the pie charts on page 13. I would like to know why, for the investment in mass transit, of the alternatives, other than No. 3, there isn't any better -- any more reduction in single occupant vehicles? What kind of -- I don't see that that can be an efficient transit system.	Transit ridership increases in each of the alternatives, but the percentage change compared to the total persons traveling in the corridor is relatively small.
T31	SOL	1	Robert Moyer south Bellevue, Newport Hills Agency: Public	I would like to suggest an Alternative 6, and I think it's very obvious. I'm really surprised that nobody has picked up on it; that is, if you looked at the congestion chart, you see that I-405 is twice as congested between I-5 and I-90 south through Renton. And that's very obvious why: there's two lanes of travel lanes there, three north of there, so all these suggestions should at least include one extra lane between I-90 and I-5 to the south. And then the reason for that is, of course, because when I-405 was first built, there wasn't much to the south and to the east. That's where your growth is going in, that's where your infill is going in. You've got to build more roads there. And they're spread out, you're not going to have mass transit do everything out there. So I think you need another lane added in there to make the number of lanes equal throughout the I-405 corridor...	There is no Alternative 5 or 6 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.
T31	SOL	2	Robert Moyer south Bellevue, Newport Hills Agency: Public	also, you really need another lane between State Route 167 and I-5 there because so much traffic is coming up there. If you look at your congestion charts, it's there. So put the pavement where the congestion is now.	The Preferred Alternative includes the addition of two general purpose lanes in each direction in that segment.
T31	SOL	3	Robert Moyer south Bellevue, Newport Hills Agency: Public	I also think that the trucks slow down traffic. I think the trucks should be prohibited between -- on the Kennydale Hill, both directions, and also the hill south of the sewage treatment plant there -- they slow things down. That would help things out.	It is outside the scope of this EIS to ban trucks on the interstate highway system. In addition, this suggestion is not considered to be reasonable or feasible because it conflicts with the purpose of the I-405 Corridor Program proposed action, which includes providing for and improving mobility for freight and goods, much of which travels by truck.
T31	ALT	1	Robert Moyer south Bellevue, Newport Hills Agency: Public	And I think Alternative 3 is the best solution, but I think you should add an extra lane between those areas.	Please see response to comment L12.ALT-1.

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T32	SOL	1	Conrad Hermsted Agency: Public	I had a suggestion, it's not original. But I attended a meeting three or four years ago, and got to talking about raising taxes on gasoline to pay for extra road building. And I said, "As long as we have a 40 percent potential increase on I-405 and we're not -- I don't say we're dumb enough, but we're not smart enough to do something about that -- utilizing that HOV lane so that people, not only people but commerce, can utilize that wasted space out there. I say wasted because we've got a potential 40 percent increase that I-405 can carry by just opening up that lane between the hours of -- well, close it between the hours of 6:00 to 9:00 and again close it at 5:00 to 8:00 or 4:00 to 7:00 makes more sense -- but six hours out of the day. That's 18 hours a day when that space is just not very well used. It's not utilized and it's a waste of money. As long as you've got dollars laying out there, I can't see why we should put more dollars on top of this to accomplish nothing.	The Preferred Alternative is designed to provide a multimodal solution to congestion and other mobility problems in the I-405 corridor. Much of this demand will continue during peak periods, which will extend for 6 or more hours daily. The Transportation Demand Mangement program will encourage travel during the off-peak hours as you suggest.
T32	SOL	2	Conrad Hermsted Agency: Public	The other thing is -- somebody alluded to, I believe, 605. As I look at this thing, we're trying to play big-league ball on a minor-league diamond by confining ourselves. It's just too high a waste that we've got now. If we want to play major league ball, we've got to play with the major leaguers. It's going to cost more money. I just want to let folks know that there's at least one more person in favor of 605. That's all I have.	Development of a new east King County freeway corridor was not advanced for further consideration as part of the I-405 Corridor Program for the reasons discussed in Section 2.2.7 of the I-405 Corridor Program Draft EIS. This does not preclude future consideration of a rural King County freeway as part of another study.
T33	FATE	1	Cleveland Rex Steward 120 Avenue A, Suite D Snohomish 98290 Agency: Sensible Solutions group / Water Aid Steering Committee and technical committees	I feel that the impact analysis is conducted at too general levels for decision makers to adequately evaluate the different alternatives.	The level of the analysis is limited by the general and programmatic nature of the alternatives. As described in the EIS, the impervious surface indicator is the most accurate predictor of some of the most significant fish habitat impact measures. Comparisons of impervious surface and riparian encroachment indicators serve to allow relative comparisons among the alternatives. More specific assessment may be overly speculative at the programmatic level, and will be performed in detail for each project as it undergoes regulatory scrutiny.

Code Number			Name	Comment	Response
T33	FATE	2	Cleveland Rex Steward 120 Avenue A, Suite D Snohomish 98290 Agency: Sensible Solutions group / Water Aid Steering Committee and technical committees	Only three indicators of environmental impact were analyzed: number of street crossings, the number of encroachments within 300 feet of streams, and totally impervious surface area. These indicators measure the consequences of road and facilities construction in physical terms. They ignore the potential impact of increased traffic volume and other activities that we derive from the project. The indicators are too narrowly focused.	See the response to comment T33.FATE-1.
T33	FATE	3	Cleveland Rex Steward 120 Avenue A, Suite D Snohomish 98290 Agency: Sensible Solutions group / Water Aid Steering Committee and technical committees	Other measures, fiscal, and in particular changes in water and sediment regimes should be identified and used to screen the alternatives.	Potential increase in traffic volume and other operational impacts are discussed under Section 3.23, Cumulative Impacts, of the Draft EIS. Water quality, including sedimentation, is discussed in more detail in the Surface Water section of Section 3.5, Water Resources, of the Draft EIS. Although fiscal parameters are important, an EIS must be objective without any consideration for cost of the project.
T33	FATE	4	Cleveland Rex Steward 120 Avenue A, Suite D Snohomish 98290 Agency: Sensible Solutions group / Water Aid Steering Committee and technical committees	We recommend the use of indicators of properly functioning condition as required in Section 7 of the ESA. I-405 project alternatives should be evaluated to determine the extent to which they affect conditions on the landscape that contribute to properly functioning conditions. The use of PFCs will not only ensure that the full spectrum of fiscal conditions are evaluated, but will enable specification of fresh alternatives to a range of value conditions that must be met if the biological community or population is to remain viable.	The level of the analysis is limited by the general and programmatic nature of the alternatives. Each alternative is composed of numerous specific projects that have not yet been designed. The EIS measures of impervious surface and riparian encroachments have been reliably estimated, and are good general indicators of the ESA measures. They are therefore useful at the level of comparing overall potential impacts among alternatives. Assessment of the ESA indicators for each alternative would be quite speculative at the programmatic level. A fully detailed analysis of impact will be performed at the project-specific level, in accordance with the state Hydraulic Code, the Federal Endangered Species Act, local critical areas ordinances, and other regulations. For all projects requiring ESA consultation, impacts will be assessed in detail using the pathways and indicators specified by NMFS and USFWS.

Code Number			Name	Comment	Response
T33	FATE	5	Cleveland Rex Steward 120 Avenue A, Suite D Snohomish 98290 Agency: Sensible Solutions group / Water Aid Steering Committee and technical committees	Analysis was conducted at sub-basin and scale. I feel that it should be conducted at the reach scale. That level of resolution is appropriate for impact analysis.	Analysis at the reach scale would not only be a monumental effort given the number of proposed projects and streams affected, but would be highly speculative given the general programmatic level of the alternatives.
T33	FATE	6	Cleveland Rex Steward 120 Avenue A, Suite D Snohomish 98290 Agency: Sensible Solutions group / Water Aid Steering Committee and technical committees	Furthermore, other than providing arithmatic means, the analysis did not integrate cross sub-basins or determine the effect on the entire Lake Washington watershed.	The analysis was stratified by sub-basin in order to allow more specific baseline description and impact assessment. Effects are described more broadly in Section 3.23, Cumulative and Secondary Effects, of the Final EIS.
T33	O	1	Cleveland Rex Steward 120 Avenue A, Suite D Snohomish 98290 Agency: Sensible Solutions group / Water Aid Steering Committee and technical committees	I'll end a little bit short of presentation unless there is a call for me to continue. I attended last night's meeting and was chagrined to hear a couple of presenters/commentators say that the impact analyses revealed that all of the alternatives would have a positive affect on the environment. Furthermore, they said there was no significant difference among the alternatives in terms of the environmental impact. These statements are categorically untrue. I encourage you to read the EIS and I encourage you to do more analysis in order to prove that point.	Please refer to the responses to comments T15.ALT-3 and T16.PPA-1.
T34	FATE	1	Eric Espenhorst 120 Avenue A, Suite D Snohomish, Washington 98290 Agency: Sensible Solutions group	Now, I-405, where it crosses the see Cedar River -- I was just there before I came to this meeting -- it is a desert. And some deserts are very ecologically productive. This desert is not -- hard pack gravel, no vegetation except for a few hardy pieces of blackberry and reed canary grass. Expanding I-405 over these river crossings is not an insignificant thing, and it's not as if the effects end at the proverbial drip line of the highway.	The area near the Cedar River is very urban, with little natural habitat. Co-lead agencies will look at many areas for possible mitigation opportunities.

Code Number			Name	Comment	Response
T34	WR	1	Eric Espenhorst 120 Avenue A, Suite D Snohomish, Washington 98290 Agency: Sensible Solutions group	I'd like to talk briefly about storm water. Wash-DOT storm water policy is in disarray right now. Jerry Alb, who's the director of the Environmental Affairs Office, sent a letter to the tri-county road maintenance group saying that Wash-DOT is very concerned about the road maintenance package because it required three things: 1) that maintenance schedules be set and adhered to for best management practices, 2) that analysis be done to determine the best management practice before installing it, and 3) that additional steps be taken to avoid impacts. Jerry Alb said that none of these things were good ideas. They sound like good ideas to me. Back in 1999 Wash-DOT issued a guidance letter on storm water which recommended some treatment, some improved treatment in light of the ESA listings. Said that the letter would expire in 2000, but the effects would be incorporated into the highway runoff manual before the letter expired.	Please see response to comment T34.WR-2.
T34	WR	2	Eric Espenhorst 120 Avenue A, Suite D Snohomish, Washington 98290 Agency: Sensible Solutions group	The letter expired, the manual has still not been updated. So the guiding storm water policy is 1995's storm water manual, which no one says is good enough to protect water quality, to restore beneficial uses of water, and certainly not to protect salmon.	The Washington State Department of Transportation (WSDOT) has issued several Instructional Letters (IL) that provide guidance related to stormwater management for road projects. IL 4020.01, effective August 24, 2001, is titled Endangered Species Act (ESA) Section 7d Project List and Stormwater Effects Guidance. It lists specific stormwater treatment and detention criteria that road projects need to meet to adequately address impacts on listed species. These requirements, which include treating 140 percent of new impervious area, are considerably more stringent than the current WSDOT Highway Runoff Manual. The Washington State Department of Ecology (Ecology) recently issued the updated Stormwater Management Manual for Western Washington. Municipal governments and agencies will have two years to bring their stormwater manuals into compliance with the requirements in this manual or functionally equivalent guidance. WSDOT's Highway Runoff Manual will meet this 2003 revision deadline.
T34	WR	3	Eric Espenhorst 120 Avenue A, Suite D Snohomish, Washington 98290 Agency: Sensible Solutions group	Third, there's been a legal effort to try to get the construction and industrial storm water permit to actually meet water quality standards. Wash-DOT is on the side seeking to preserve the status quo in which the construction and industrial storm water permit does not have to assure outcomes that protect water quality.	Please see response to comment T34.WR-2.

Code Number			Name	Comment	Response
T34	WR	4	Eric Espenhorst 120 Avenue A, Suite D Snohomish, Washington 98290 Agency: Sensible Solutions group	And, lastly, the State of Washington, yet again, is being sued by the tribes because the State and Wash-DOT refused to come up with a clear timetable about when the State would remedy some 2,000 culverts that are blocking fish passage. The State said that they couldn't guarantee that they would ever be replaced, and the tribes are in Federal court to try to get this fixed. Wash-DOT has to provide much more certainty to protect the environment.	Your comment is acknowledged.
T35	WILD	1	Barbara Wilson Agency: National Wildlife Federation	There are numerous recent studies that have shown one of the greatest threats to wildlife is the loss of habitats due to urbanization and development. We see transportation planning as a major contributing factor to this phenomenon.	The EIS acknowledges that a loss of habitat can be a major factor threatening wildlife.
T35	O	1	Barbara Wilson Agency: National Wildlife Federation	Washington State is growing fast, and we as a state need to deal with transportation infrastructure. We need to be able to move people and goods.	Your comment is acknowledged.
T35	ALT	1	Barbara Wilson Agency: National Wildlife Federation	We believe that Wash-DOT's current set of alternatives does not take us in the right direction of integrating transportation planning land use and habitat protection. We are concerned that the current alternatives will diminish critical habitats. 168 wet lands are at risk, 56 of those have been designated as high priority. We're concerned that the streams and watersheds will be significantly degraded by the addition of four new lanes of impervious surface in the watershed.	WSDOT understands the concerns of widening I-405 and potentially degrading some critical habitat. WSDOT is currently working with agencies to begin early mitigation strategies and to avoid and minimize these potential impacts. WSDOT believes there are enhancements opportunities that go beyond standard project-level mitigations.
T35	LU	1	Barbara Wilson Agency: National Wildlife Federation	This new pavement will contribute to sprawl, especially in the south end of the corridor where, as I mentioned before, I also happen to be a resident.	Please see the responses to comments L27.LU-1, T29.LU-1, and E66.SOL-1.
T35	TR	1	Barbara Wilson Agency: National Wildlife Federation	A roads-building approach is the wrong approach. We know that we cannot build our way out of the congestion with new roads.	Please refer to the response to comment E66.SOL-1.
T35	SOL	1	Barbara Wilson Agency: National Wildlife Federation	We've been working with the Sensible Solutions Coalition to look for an alternative that meets our transportation needs, does not contribute to sprawl, protects neighborhoods, is better for fish and wildlife who must navigate through our waterways and depend on critical wetlands. In closing, I'll say we hope that you will seriously consider studying the triple win citizens' solution, Alternative 5.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
T35	SOL	2	Barbara Wilson Agency: National Wildlife Federation	The National Wildlife Federation looks forward to working with Wash-DOT and the other consulting agencies to find a solution that costs less, is more effective, is better for neighborhoods like the one I live in, and commuters, and also protects our air quality, water, and environment.	Thank you for your comment.
T36	N	1	David Hunter 425 North 36th Renton Agency: Public	I'm surprised that no one brought up the fact that there is going to be a lot more noise. When the other two lanes were put in about five or six years ago, the noise was about half of what it is now, and ever since they put the walls they've actually gotten louder.	The EIS provides a comparison between the number of residential parcels that could be affected by noise under each of the alternatives.
T36	N	2	David Hunter 425 North 36th Renton Agency: Public	After reading the EIS today I was kind of confused that the whole EIS could have avoided the subject of what they would do to reduce the impact of the extra noise, and they basically said they put up the walls and that's pretty much all they are going to do. And if there is a lot more they can do to reduce the impact of the extra noise, I think that they certainly need to go back to the books and figure out how they can do that.	At this stage, there is not sufficient design detail to determine the noise effects of design options at specific locations. Mitigation measures (including traffic management measures, acquiring land as buffer zones, realigning the roadway, installing noise insulation in public use or nonprofit institutional structures, and constructing noise barriers or berms) to reduce the noise at areas where noise impacts are determined would be evaluated as specific designs are developed for areas of the corridor.
T37	ALT	1	Ted Schwartz 9818 South 213th Place Kent Agency: Public	My alternative -- what I would back would be Alternative No. 1 because that reduces urban sprawl and contributes to higher capacity living, which I think we as a society need, and I would urge you all to really strongly endorse Alternative 1.	Analyses of the alternatives conducted by the Puget Sound Regional Council using its DRAM/EMPAL land use forecasting model indicated that Alternative 1 - HCT/TDM Emphasis, is expected to be less effective in achieving the expressed objectives of reducing urban sprawl, encouraging a compact urban form, and increasing urban density than either Alternative 2 - Mixed Mode with HCT/Transit Emphasis, or Alternative 3 - Mixed Mode Emphasis. Please refer to Section 3.23.3 of the I-405 Corridor Program Draft EIS for a discussion of land use, development, and transportation within the region and study area. Please note that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
T38	SOL	1	Ray Griffin 4306, 144th Avenue Southeast Renton, Washington, 98059 Agency: Public	My problem is that I don't too many years left, so I would like to be able to get around, and building roads is the only way you're going to do it for me. And that's the short-term.	Thank you for your comment.
T38	ALT	1	Ray Griffin 4306, 144th Avenue Southeast Renton, Washington, 98059 Agency: Public	I think the Alternative 3 as proposed by the Renton councilman is a very good alternative.	Please see response to comment L12.ALT-1.
T38	O	1	Ray Griffin 4306, 144th Avenue Southeast Renton, Washington, 98059 Agency: Public	I think some of the things that the environmental coalition is talking about has a lot of merit, but it has things that have absolutely nothing to do with getting people around. And this is a transportation problem, and everybody wants to turn everything into a environmental problem, with noise, and they talk about reed canary grass.	Thank you for your comment.
T38	SOL	2	Ray Griffin 4306, 144th Avenue Southeast Renton, Washington, 98059 Agency: Public	If they would start putting trees around Lake Washington again instead of having clearcut beautiful lawns all along there, then there would be bugs in there for the fish to eat, there would be shade for the small fish to keep cool. We beautify things by removing all the vegetation and then we wonder where do the fish go and why did they go, and we are as guilty as sin for doing it, and we're all guilty.	Thank you for your comment.
T38	ALT	2	Ray Griffin 4306, 144th Avenue Southeast Renton, Washington, 98059 Agency: Public	But go with No. 3, please.	Please see response to comment L12.ALT-1.
T39	TR	1	George Hadley 1401 Southwest 172nd Normandy Park, Washington 98166 Agency: Public	In the article on the top of the developing concepts chart, which was written by Payton Whitely of Seattle Times, says, "Evening rush hour would be 250 percent worse in 2020 if nothing is done." Now if the congestion would be 7 hours in 2020 if nothing is done, and that is per the chart "Environmental Effect Compared to Transportation Performance," does that mean that congestion is about two-and-a-half hours now?	The 250 percent number quoted is from old studies using different performance measures. Recent data show that current congestion on all facilities would increase from 4 hours to 5 hours a day by 2020. Several specific roadway segments would experience much higher increases in congestion.

Code Number			Name	Comment	Response
T39	TR	2	George Hadley 1401 Southwest 172nd Normandy Park, Washington 98166 Agency: Public	Also, the Alternative 5, People's Sensible Solution for I-405, has a chart quoting a Fairbanks Maslin, M-a-s-l-i-n, Maullin, M-a-u-l-l-i-n and Associates survey in 2000 that asserts that 56 percent of Washington voters say "expand transit," while only 25 percent say "build more roads." Have they provided the basis for that assertion? For example, exactly who was surveyed? What questions were asked -- that means exactly how were the questions phrased -- to Wash-DOT or any public agency? Is that information in the public domain? Where could it be found if it is public?	There is no Alternative 5 in the I-405 Corridor Program EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. The chart quoting a Fairbanks, Maslin, Maullin & Associates (2000) survey was displayed by the Sensible Solutions for 405, not the I-405 Corridor Program, at the Draft EIS hearings held September 18-20, 2001. Fairbanks, Maslin, Maullin & Associates informed WSDOT that the referenced survey was conducted for a private entity, the "No on Initiative-745" campaign, in August 12-15, 2000; cannot be released without the campaign's authorization; and that the campaign is no longer in existence. (Personal telephone communication between Dave Metz, Fairbanks, Maslin, Maullin & Associates, and Christina Martinez, WSDOT, on February 5, 2002.) Co-leads respectfully request that questions regarding information produced by the Sensible Solutions for 405 be directed to them. At the time of publication of this document, Sensible Solutions for 405 can be reached via telephone at (206) 298-9338 or on the internet at http://www.405solutions.org/.
T40	O	1	James L DuVall 10520 N.E. 197th Bothell, WA 98011 Agency: Public	First of all, we've got to get the cars off the street, and we should be starting with the freeways. And the way to do that is not to add more lanes, which is expensive, and the big carmakers will be overjoyed with that. And the cars will pour onto the freeways like mad. That will accomplish very little. In fact, it will probably create more corruption, more problems than you can possibly visualize at this moment, and use more gasoline, which we don't have a lot of, and they're gouging the public constantly.	Thank you for your comment.
T40	SOL	1	James L DuVall 10520 N.E. 197th Bothell, WA 98011 Agency: Public	So in order to get the cars off the street and reduce the pollution, I'm proposing and suggesting to these people -- I take a very simplistic approach. One is, we have the right of eminent domain. We have freeways already going up and down 405 and I-5. We adopt the Japanese system, high speed rail transit, 150 miles an hour speed. Reasonably low fare at a dollar a piece one way, a dollar the other way. You put the thing in, starting with the highest problems first, have them do that first, what would be the most problems. For example, maybe it's from Seattle to Tacoma or Seattle to Everett. Maybe one stop, maybe no. You program it so you pilot it, like you would acomputer program, and you debug it. So you get all ofthat out before you put anything else in.	Alternatives 1 and 2 study a fixed-guideway high-capacity transit system similar to your suggestion. However, it was determined that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. Alternative 3 and the Preferred Alternative include a bus rapid transit system with performance characteristics similar to the fixed-guideway system. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

Code Number			Name	Comment	Response
T40	O	2	James L DuVall 10520 N.E. 197th Bothell, WA 98011 Agency: Public	But in order to begin that, we need to get a consensus of things going. So what I suggest the state do -- and not some big floundering committee with 10,000 votes. We need a very simple decision here by two or three people. You get with the labor unions, because this kind of an operation will require a lot of employees, both skilled and unskilled. And you get with business concerns, large construction firms and some small ones: Knutson, John S. Wright, those kinds of people. And then you get with some financial institutions, and you're problably going to need four or five. And you get the state to underwrite these costs and guarantee an 8 percent profit. And you get those people together, and you get an agreement on a simple schedule. We have the technology. That's already here. All we have to do is put into effect the designs to the cars and how many we need. We would probably only need one set of cars going one way and one set of cars going the other at that rate of speed, carrying people safely, easily and comfortably.	Thank you for your comments regarding implementation of the I-405 Corridor Program.
T40	O	3	James L DuVall 10520 N.E. 197th Bothell, WA 98011 Agency: Public	And the bottom line here is to tie that kind of a plan -- let's just say we're going to have it on I-5. We tie that kind of a plan into existing transportation systems, already in existence. We already have a system in Seattle. We have a system in King County. We have a system in Bothell. They are all there. If we don't, they're easily installed. We already have a concept of park and ride. All we have to do is work that in very simply, so that we keep these cars off the street. Now, once that first phase is in, you can start on the next phase. That should significantly reduce freeway traffic, and it should also significantly reduce overflow traffic into these cities and also internal traffic. These places -- if they need any stops, and they shouldn't, but if they need any stops, they could probably have one. These trains should be able to provide to and from for travel to the job, for pleasure, and for shopping. It's that simple. I can't see anything more difficult than that.	The Preferred Alternative includes about a 50 percent increase (+4500 to 5000 spaces) in the existing park-and-ride capacity in the I-405 corridor.

Code Number			Name	Comment	Response
T40	O	4	James L DuVall 10520 N.E. 197th Bothell, WA 98011 Agency: Public	The labor unions should be jumping for joy. It will provide mammoth employment. The financial institutions want to make money, and you can, but you've got to control that a little. So do the construction firms. It's about that simple. I could get into a lot of the detail. I haven't worked it out. But the concept is sound. The concept of this is very simple. It isn't difficult to put this into practice. They do it in Japan. I don't know why we can't do it here.	Thank you for your comment.
T40	O	5	James L DuVall 10520 N.E. 197th Bothell, WA 98011 Agency: Public	In addition, as you phase these things in -- the east side probably doesn't want any part of this -- you know, eastern Washington. But that's okay. One day, with population growing as it is, they're going to need it. And at the same time, with the technology growth we have, we can be improving these kinds of systems constantly. That's a hell of a good start in my opinion, and they ought to be doing it. People ought to be forgetting that they're Democrats or Republicans, because when they're elected, they become public servants, and that's the problem in Olympia today.	Thank you for your comment.
T40	O	6	James L DuVall 10520 N.E. 197th Bothell, WA 98011 Agency: Public	I think that's what it's all about, protecting and enhancing the quality of life. And if it doesn't, I'm not sure we need it. We may have to need something that's not so good in the short time. People around don't seem to be able to look at -- have a vision of anything, you know, between greed and selfishness, and a desire to prolong political careers.	Thank you for your comment.
T40	O	7	James L DuVall 10520 N.E. 197th Bothell, WA 98011 Agency: Public	But you just wait and mark my words. They will bumble around with things until they have spent way too much money, until we get into the real soup on traffic congestion, and then they'll get desperate. And then it will affect more people in such a negative way, they'll have a hell of a time getting the public to agree to anything.	Thank you for your comment.
T40	O	8	James L DuVall 10520 N.E. 197th Bothell, WA 98011 Agency: Public	But this concept of a train, the transportation system -- bucking up these internal transportation systems in the counties and cities. And the cities and the counties all have to put out money for transportation, and so does the state. They can pool that money, if they had any kind of brain, and work this out so it benefits employment, the quality of life, air quality, pollution.	Thank you for your comment regarding alternative means of travel.

Code Number			Name	Comment	Response
T40	SOL	2	James L DuVall 10520 N.E. 197th Bothell, WA 98011 Agency: Public	That's what we need to do. We need to reduce this use of gasoline. These cars on the street, we really need to get those down. To start out, to try some little local transit system or something else or some light-rail system, they're wasting their time. It's not going to do it. The population is growing at radical lengths, and you really need to get something like this so we can expand on it and apply technology.	The Preferred Alternative is designed to provide a multimodal solution to congestion and other mobility problems in the I-405 corridor. Transit and nonmotorized modes are included in that solution.
T41	SOL	1	Adam Schaeffer 14333 113th Avenue East Kirkland, Washington 98034 Agency: Public	I've grown up commuting on both 405 and I-5, and I've seen the impacts of lane additions. And what I've seen is the traffic immediately expands to fill the capacity. There's no benefit that I've seen from adding lanes.	Please refer to response to comment E66.SOL-1.
T41	SOL	2	Adam Schaeffer 14333 113th Avenue East Kirkland, Washington 98034 Agency: Public	I would strongly recommend looking into other alternatives: increased bus services, even more radical approaches, such as alternate-day driving.	Each of the action alternatives includes an increase in transit service ranging from 50 percent up to 100 percent. Please refer to Chapter 2 of the I-405 Corridor Program Draft EIS for a description of the range of alternatives, improvements, and modal elements that have been considered.
T41	SOL	3	Adam Schaeffer 14333 113th Avenue East Kirkland, Washington 98034 Agency: Public	We live in an area surrounded by water, and there's only so many places we can put roads. And if we fill them up with freeway lanes, then when it comes time that we have to wean people away from their cars, there won't be any space left for alternatives.	Please refer to response to comment E66.SOL-1.
T41	SOL	4	Adam Schaeffer 14333 113th Avenue East Kirkland, Washington 98034 Agency: Public	So adding capacity is great, but we need to look at many more alternatives than simply adding lanes to 405.	Please refer to Chapter 2 of the I-405 Corridor Program Draft EIS for a description of the range of alternatives, improvements, and modal elements that have been considered.
T42	SOL	1	Rodger Herbst 18003 178th Avenue Northeast Woodinville, Washington 98072 Agency: Public	I appreciate the opportunity to comment on Washington State Department of Transportation's plans to deal with congestion on I-405. I also appreciate the DOT efforts to develop a multimodal solution for I-405.	Thank you for your comment.

Code Number			Name	Comment	Response
T42	SOL	2	Rodger Herbst 18003 178th Avenue Northeast Woodinville, Washington 98072 Agency: Public	The Department of Transportation's Preferred Alternative, No. 3, mixed modal emphasis, would widen dozens of neighborhood roads leading to I-405, as well as adding multiple lanes to I-405 itself. I concur with Sensible Solutions for the 405 Coalition, that the DOT Preferred Alternative 3 is not adequate.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. Also, please refer to the response to comment E66.SOL-1. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
T42	TR	1	Rodger Herbst 18003 178th Avenue Northeast Woodinville, Washington 98072 Agency: Public	I believe it is not adequate for the following reasons: First, just increasing capacity by adding more asphalt does not work. Studies from across the country show that adding capacity just increases congestion.	Please refer to the response to comment E66.SOL-1.
T42	SOL	3	Rodger Herbst 18003 178th Avenue Northeast Woodinville, Washington 98072 Agency: Public	Second, increase in local auto traffic due to widening of neighborhood roads will create additional physical hazards in surrounding neighborhoods, as well as worse air, water, and noise pollution.	Please refer to the response to comment E66.SOL-1.
T42	TR	2	Rodger Herbst 18003 178th Avenue Northeast Woodinville, Washington 98072 Agency: Public	Third, the deteriorating safety and environmental conditions brought about by increasing local traffic flow to a widened 405 will further discourage local transportation choices, such as options to walk or bicycle to local areas. This in turn will also increase congestion even more.	The DEIS documents that encouraging greater use of I-405 will actually improve safety. The program will also include a substantial environmental improvement program.
T42	COST	1	Rodger Herbst 18003 178th Avenue Northeast Woodinville, Washington 98072 Agency: Public	Fourth, the DOT scheme is too expensive. It will be a taxpayer nightmare.	Thank you for your comment.

Code Number			Name	Comment	Response
T42	SOL	4	Rodger Herbst 18003 178th Avenue Northeast Woodinville, Washington 98072 Agency: Public	I urge the Department of Transportation to work with the Sensible Solutions Coalition to develop their fifth alternative. I believe that that alternative will be cheaper, faster, and better.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Please refer to the response to comment E66.SOL-1.
T43	ALT	1	Eric Ogden 2524 Northeast 94th Street Seattle, Washington 98115 Agency: Public	As far as the 405 improvements are concerned, I'm strongly in favor of Alternative One, and I think that the improvements in the Eastside transportation in general, and the 405 corridor in particular, would best be served through high-capacity transit, specifically monorail.	Please see response to comment E15.ALT-1.
T43	TR	1	Eric Ogden 2524 Northeast 94th Street Seattle, Washington 98115 Agency: Public	In fact, you know, car travel -- the miles traveled, the number of trips taken, the number of people -- the number of trips made by single-occupant vehicles just increases when the roadways are available, because people think that that's an acceptable way to travel around the region.	Please refer to response to comment E66.SOL-1.
T43	SOL	1	Eric Ogden 2524 Northeast 94th Street Seattle, Washington 98115 Agency: Public	In fact, because of environmental considerations, economic considerations, and the specific geographic considerations particular to this -- specific to this region of the country, dictate that an alternative choice be made. And I think Alternative One is that alternative. Instead of just adding multiple lanes of traffic, relying on automobile travel as a mode of transport, have some vision for the future and make some bold moves to link all Eastisde communities with high-capacity rapid transit.	The Preferred Alternative does not include a fixed-guideway transit system but includes an extensive bus rapid transit system. The Preferred Alternative also includes a recommendation to evaluate additional high-capacity transit in the central portion of the study area. This could include future rail or other technologies such as monorail.
T43	SOL	2	Eric Ogden 2524 Northeast 94th Street Seattle, Washington 98115 Agency: Public	And I started off by saying monorail. That's because the monorail initiative in Seattle has gained a terrific amount of momentum, and it's looking more and more likely that the monorail system will be built after the initiative -- after the monorail goes up for a vote in 2001. All mayoral candidates and most of the City Council are endorsing the monorail as an alternative, and the new technologies available for the monorail. It would be a beautiful thing if in ten to fifteen years, there were a regionally-linked monorail system transporting people efficiently around Seattle on the west side and the east side, from -- south from the airport, all the way north to Bellevue and on up to Woodinville, Bothell, Lynnwood, and then back up the I-5 corridor.	Please see response to comment T42.SOL-1. For your information, the Elevated Transportation Company recently published estimated monorail construction costs in the city of Seattle. These costs ranged from $69 to $124 million per mile for a 14-mile elevated system. These costs were similar to the fixed-guideway transit system costs evaluated in Alternatives 1 and 2 in the Draft EIS.

Code Number			Name	Comment	Response
T43	SOL	3	Eric Ogden 2524 Northeast 94th Street Seattle, Washington 98115 Agency: Public	The automobile is a dying breed of transportation.	Thank you for your comment.
T43	COST	1	Eric Ogden 2524 Northeast 94th Street Seattle, Washington 98115 Agency: Public	In addition to my comments about Alternative One, one of my concerns with Alternative One is the extremely high price tag and the potential, quote, unquote, overkill on the light rail that's been recommended for that plan. I believe the cost estimates are extreme relative to potential costs per mile of a monorail system or of an interim system utilizing the current right-of-way for the railroad tracks, which is a quick and economical way to add to transportation capacity in the 405 corridor and preserve those corridors for future higher capacity light rail or monorail -- of course monorail being my preference, because there's tremendous pressure to do something now.	Thank you for your comment.
T43	O	1	Eric Ogden 2524 Northeast 94th Street Seattle, Washington 98115 Agency: Public	And with the colossal $8 million for the transportation project, it's going to be tied up in debate and possibly suits, and it won't happen quick enough to make a reasonable impact and save the economy of the Pacific Northwest.	Thank you for your comment.
T43	O	2	Eric Ogden 2524 Northeast 94th Street Seattle, Washington 98115 Agency: Public	And so interim solutions need to be considered, as I've mentioned.	The I-405 Corridor Program will be phased to provide benefits first where they are needed most.
T44	SOL	1	Jeff Bidwell 1600 109th Avenue Southeast Bellevue, 98004 Agency: Public	And I guess my first comment on this is that I'm generally opposed to the widening of the freeway system for general purpose lanes. The result of adding those general purpose lanes is all too clear. It's going to create more traffic, we'll be backed up at the same level of congestion, and all we would have done is to have facilitated a new wave of development.	The I-405 Corridor Program is being proposed in response to growth that already has occurred within the study area. Accommodation of planned regional growth also is part of the adopted program purpose that has guided alternatives development, as identified in Section 1.3 of the I-405 Corridor Program Draft EIS.

Code Number			Name	Comment	Response
T44	SOL	2	Jeff Bidwell 1600 109th Avenue Southeast Bellevue, 98004 Agency: Public	I believe a solution or part solution is to have more transit, have some sort of cost structure built into the way the freeways are used.	Each of the action alternatives includes an increase in transit service ranging from 50 percent up to 100 percent.
T44	N	1	Jeff Bidwell 1600 109th Avenue Southeast Bellevue, 98004 Agency: Public	Noise is a major major issue for a lot of us who live close to 405. Currently my home receives noise in excess of 67 DBA, and any additional noise would make my home completely unlivable. So that certainly is a very important aspect of what should be considered in any proposed widening of 405.	The current plans are conceptual in nature and do not show project details, as they have not been specified. Once an alternative is chosen and specific project designs are developed, noise impacts would be determined from the individual transit and roadway elements and specific mitigation would be evaluated.
T44	O	1	Jeff Bidwell 1600 109th Avenue Southeast Bellevue, 98004 Agency: Public	I want to, at this point, just reference a letter that I sent in to Sound Transit, to a Mr. Dave Erling, back in April of this year. And what I sent to Mr. Erling was a diagram showing the downtown access for Bellevue. And what this downtown access diagram showed, and the associated material attached to it, was that the downtown access overramps and throughovers have currently been approved for development and the assumption has been made that 405 will be widened, and they're actually going ahead with this at additional cost, and that's before there's been any public process, before there has been any vote. This points to a lack of concern for the public process, and I believe a violation of state statutes. So I'm going to reference this letter I sent to Mr. Erling, dated April 30, 2001, and it was from Geoffrey J. Bidwell, and you have my address. The response I got back from Mr. Erling essentially did not address the issues that I raised about public process and input but covered a lot of issues and the public process in general as they related to downtown access. So I was somewhat disappointed to receive that type of response.	Sound Transit feels its May 17, 2001 response to your April 30, 2001 letter concerning the Bellevue Downtown Access Project adequately details that project and its relationship to the I-405 Corridor study.
T44	SOL	3	Jeff Bidwell 1600 109th Avenue Southeast Bellevue, 98004 Agency: Public	There is a whole mess of issues with 405, but essentially widening it is foolish. We can look at what happened down in L.A. with widening the roads down there, and all we know is we're back to square one again. All we would have achieved is spending big bills and, in addition, the quality of our lives in the residential neighborhoods would have degraded as a result of it. So to sum it up, I am not supportive of general purpose lanes for the 405 proposal. I guess that's about it.	Thank you for your comment.

Code Number			Name	Comment	Response
T45	ALT	1	Renay Bennett 826 108th Avenue Southeast Bellevue 98004 Agency: Public	I would like to comment on the Proposed Alternative to the I-405 corridor, a study proposing what I think is fatally flawed. The cost is so high, it's unfathomable that tax dollars could be spent in this way. From what I've seen, they represent a cushion for nothing but building.	A preferred alternative was not identified prior to or during the time comments were being solicited. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
T45	O	1	Renay Bennett 826 108th Avenue Southeast Bellevue 98004 Agency: Public	I also think that, as a resident, the sound is bad enough right now, and four lanes would be horrible. The noise would be awful. The impacts to the environment are unbearable. You can't replace them once you destroy them. We have a lot of wetlands, lots of creeks, not to mention the endangered species in habitats like Cosey Creek, Mercer Slough, all of those areas.	It is a goal of the I-405 Corridor Program to maintain, protect, and enhance the functions of fish and wildlife habitat, wetlands, and other waters of the state and to seek a net gain in those functions through restoration, creation, and enhancement. To help achieve this goal, WSDOT has prepared and is implementing a proposed early-action environmental impact mitigation decision-making process. Please refer to Appendix J in the Final EIS
T45	O	2	Renay Bennett 826 108th Avenue Southeast Bellevue 98004 Agency: Public	We also have to face the sheer simple fact that after this is all done being built, we're going to be in about the same place we are today.	The Preferred Alternative will provide improvements in congestion and personal mobility within the corridor.
T46	TR	1	Rafe Beswick 14715 27th Avenue Northeast Shoreline Agency: Public	And all the alternatives I see are capital intensive. It seems to me that there would be a much less expensive alternative and one that would be effective sooner, and that would be increased driver training and education. The freeways are capable of carrying the amount of traffic that is being demanded. The problem is the way people drive. People slow down when they exit impeding traffic, people drive slowly in the left hand lanes rather than moving to the right as is required by law. People do not speed up enough when merging. People oftentimes do not pass a slower vehicle but will stay behind trailing creating a line of slower moving traffic.	The Preferred Alternative will provide improved travel conditions but cannot change directly the driving habits of the public.
T46	SOL	1	Rafe Beswick 14715 27th Avenue Northeast Shoreline Agency: Public	If law enforcement were encouraged and required to enforce existing laws requiring slower vehicles to move to the right, pull over people who are driving too slowly and if funds were procured and people were required to take additional driver education which taught them the repercussions of their poor driving technique, we could really alleviate most if not all of the problem.	Incident management and swift treatment of accidents is part of the program.

Code Number			Name	Comment	Response
T46	SOL	2	Rafe Beswick 14715 27th Avenue Northeast Shoreline Agency: Public	You can see examples in nature that show what should be done. When you come to a narrowing of a channel in a river or if you have a confluence of more streams into one and the river does not widen to carry additional amounts of water, what is done is the water speeds up. It doesn't slow down. Human beings, being the contrary creatures that we are, slow down when they run into additional traffic rather than speeding up as nature would dictate to maintain a constant flow.	Thank you for your comment.
T47	SOL	1	Jim DiPeso Agency: REP America	There's no question that the I-405 needs some transportation upgrades, including road improvements, increased transit, and strategies to make better use of existing road capacity. The question is making the most efficient use of our tax dollars, ensuring we can move the greatest number of people and goods per dollar spent.	Thank you for your comment.
T47	COST	1	Jim DiPeso Agency: REP America	My primary concern with the Preliminary Preferred Alternative is the cost, especially for the proposal to add two general purpose lanes in each direction. As a recent article in U.S. News and World Report pointed out, there are increasing questions across the country about the congestion relief benefits that transportation strategies focused heavily on road construction. The tax increase that will be needed to pay for a project of this magnitude, especially if the entire burden is borne by King County, will be quite burdensome.	Alternative 3 - Mixed Mode Emphasis, is similar to the preliminary preferred alternative; however there are several important differences. The preliminary preferred alternative also included: a high-capacity transit system in the central I-405 corridor, up to two additional general purpose lanes in each direction on SR 167 from I-405 south to SW 43rd Street in Renton, preservation of the existing Burlington Northern Santa Fe (BNSF) Railroad alignment for a future transportation corridor; a pedestrian trail in the BNSF right-of-way; and continued analysis of regional pricing and managed/tolled lanes. The Preferred Alternative that emerged from the I-405 Corridor Program has nearly 150 multimodal projects and actions that will reduce traffic congestion and improve mobility for people and goods within the 224 square mile study area over the next 20 years. Federal, state, regional, and local agencies, with public support, will be tasked with funding the proposed regional corridor projects.
T47	SOL	2	Jim DiPeso Agency: REP America	We also have to take into account that as we enter a new economic climate, money will be harder to come byWe need to take a closer look at trying to get more for less. I strongly urge study of the Sensible Solutions Alternative 5, a balanced plan which would target those building dollars toward relieving choke points expanding transit, and buying more capacity through aggressive demand site strategies that in essence pay all of us to drive less.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T48	TR	1	Laura Fox Agency: Public	I don't agree that widening 405 by two lanes will solve the traffic congestion along the 405 corridor. The new lanes will only fill up to capacity, just like we are experiencing today.	Please refer to response to comment E66.SOL-1.

Code Number			Name	Comment	Response
T48	O	1	Laura Fox Agency: Public	The impacts of the added four lanes are unacceptable: greater noise levels to neighbors as it is at times already bearable in my neighborhood, disturbing wet lands, more pavement, and gobbling up land which must first be condemned is just not acceptable, let alone the cost for such a project.	All acquisitions will be made pursuant to the Uniform Real Property Relocation and Acquisition Act and the state and federal policies and regulations implementing this law. The preferred method of acquisition is through negotiation and payment of fair market value. Only if these negotiations come to an impasse will the property be acquired by eminent domain. With respect to the other matters addressed in your comment please refer to the response to comment E66.SOL-1.
T48	SOL	1	Laura Fox Agency: Public	Exploring other modes of transportation and other alternatives is my preferred solution.	Please refer to Chapter 2 of the I-405 Corridor Program Draft EIS for a description of the range of alternatives, improvements, and modal elements that have been considered.
T49	SOL	1	Robert Moyer 12207, Southeast 47th Street Bellevue, WA 98006 Agency: Public	I have a suggestion for improving the current state of 405 southbound/Renton. And I guess that's in conjunction with the Sound Transit direct access ramp's North 8th Street. And that is to add -- or to extend the State Route 900, which is Sunset merge ramp to southbound 405 to meet the State Route 169 in Renton exit ramp. This will be an extension of about 400 feet of highway on the west side of 405 and it allows a much larger -- longer merge and exit for people coming out of the Boeing plant heading south and people getting off 405 after coming over the Kennydale Hill getting off and going to Renton. It's a simple thing; it shouldn't cost too much and it's a good thing to do before they fix 405.	Alternatives 2, 3, and 4 include improvements to I-405 in the Renton area with additional lanes and interchange improvements.
T50	ALT	1	Robert Blayden 9933 - 143rd Avenue Southeast Renton, Washington 98059 Agency: Citizen's Advisory Committee	I've sat on the citizen's committee; I've seen the statistics and I've seen the studies that have been done over this past two years, and I firmly believe that what is needed is at a very minimum the Alternative 3 that gives us two lanes of freeway as well as a very good complement of transit to go along with it. It is a good mix between single occupancy and HOV ridership.	Please see response to comment L12.ALT-1.
T50	O	1	Robert Blayden 9933 - 143rd Avenue Southeast Renton, Washington 98059 Agency: Citizen's Advisory Committee	And the folks that come in here and will testify today that -- in the next few days that this should only be addressed in high occupancy vehicles, i.e. transit, are totally misinformed and have not studied the issues. So again, I'm fully in support of Alternative 3.	Thank you for your comment.

Code Number			Name	Comment	Response
T51	O	1	Jack Whisner 66 Bell Street, #101 Seattle, WA 98121 Agency: Public	I'm speaking in favor of Alternative 5, which includes some critical roadway investments, but this statement is a focus on the transit element. The city of Renton officials have spoken out against high speed or high capacity transit on the Burlington Northern/Santa Fay Renton dinner train track, and I'm making this supplement statement to reassure the city of Renton what we're suggesting is not high speed or high capacity transit but rather a modest or cost effective, what is called intermediate capacity transit.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
T51	SOL	1	Jack Whisner 66 Bell Street, #101 Seattle, WA 98121 Agency: Public	One possible mode to provide this service is called diesel multiple unit, and they're self-propelled passenger cars. They're in use in British Columbia today and in many European cities. The notion would be that these cars, either singly or coupled together in groups of two, would provide two-way, all-day transit service between Woodinville and Renton and perhaps extended to the Tukwila commuter rail station. It would be frequent enough to be useful, running every 10 or 15 minutes.	Please note the response to comment L52.SOL-2.
T51	SOL	2	Jack Whisner 66 Bell Street, #101 Seattle, WA 98121 Agency: Public	The capital part of the project would include the rolling stock and a yard, and also enough passing track to allow some frequency to be achieved because right now the right of way has just a single track but will require station and activity centers, and there are at least two stations in downtown Renton which would make sense. There could be stations at Port Quindal, the next residential neighborhood up west of Factoria, near Wilburton, east of downtown Bellevue at Northeast 8th, at Overlake Hospital, the south Kirkland park and ride, near the Lake Washington business area -- the track runs just a few blocks from there -- near downtown Kirkland, at the intersection with Northeast 85th where there'll be bus service, and the Totem Lake area and at Evergreen Hospital and finally in downtown Woodinville.	Please note the response to comment L52.SOL-2.
T51	SOL	3	Jack Whisner 66 Bell Street, #101 Seattle, WA 98121 Agency: Public	This north/south transit service would connect these activity centers better than bus service that was located in the freeway -- the center HOV lanes of an expanded 405. The bus rapid transit element of Alternative 3 is fatally flawed because it's in that freeway, the center of freeway envelope, and has to use congested arterials to reach the activity centers.	Please note the response to comment L52.SOL-2. In particular, note that neither I-405 nor the BNSF right-of-way provides service to the center of all activity centers in the I-405 corridor. In some locations, such as downtown Bellevue, I-405 is closer to the activity center than is the BNSF right-of-way. In other locations, such as downtown Kirkland, the BNSF is closer. One advantage of bus-based transit, such as in the Preferred Alternative, is that the buses can leave the freeway right-of-way to reach into an activity center, such as by using the Bellevue HOV direct access ramp to get to the Bellevue Transit Center.

Code Number			Name	Comment	Response
T51	SOL	4	Jack Whisner 66 Bell Street, #101 Seattle, WA 98121 Agency: Public	There are three other key elements to a good transit package for the East Side in addition to the DMU line, diesel multiple unit, from Woodinville to Renton. One would be frequent service between the downtown Seattle transit tunnel and via the I-405 center roadway to downtown Bellevue and Eastgate and downtown Issaquah. Another would be a very frequent bus service connecting the activity centers on the East Side that are not served by the DMU line such as Factoria, downtown Bellevue, Overlake and Redmond. And of course that at every intersection there'd be a station, a transfer station.	The Preferred Alternative includes frequent service between downtown Seattle and several key locations on the Eastside as well as frequent bus service connecting activity centers throughout the study area.
T51	SOL	5	Jack Whisner 66 Bell Street, #101 Seattle, WA 98121 Agency: Public	And of course the other element is what already exists today, that is good local service, with frequencies improved and a peak overlay network oriented to both downtown Bellevue and downtown Seattle. So it's bus rapid transit, local bus and the DMU line.	The Preferred Alternative includes improved frequencies on many current local routes and peak routes oriented to downtown Bellevue and downtown Seattle.
T51	ECON	1	Jack Whisner 66 Bell Street, #101 Seattle, WA 98121 Agency: Public	I don't think the negative externalities imposed on the city of Renton or the neighborhoods through which the DMU line would pass would be too extensive. The negative externalities of a general purpose expansion on 405 would be much greater.	Thank you for your comment.
T52	O	1	Kate Simpson 613 Southwest Langston Road Renton, Washington 98055 Agency: Public	I have been looking over the EIS and some of these numbers are just not believable. I would like more detail. Well, I suppose I could look at the 400 page.	It is not clear from your comment that the detail you request is beyond that contained in the I-405 Corridor Program Final EIS, the supporting expertise reports, and other data sources referenced in the EIS.
T52	O	2	Kate Simpson 613 Southwest Langston Road Renton, Washington 98055 Agency: Public	But anyway, just from this -- the piece of information that they pulled out of the report, these graphs just don't make sense to me. And I don't think I'm a stupid person, but they don't look right and I would be really interested in what number 5 is. Those people sound like there's information that would be valuable and I would like to see that.	Please refer to the response to your comment T52.O-1.
T53	SOL	1	Kevin Gooding 7453-133rd Avenue Southeast Newcastle Agency: Public	I just wanted to come forward today and give my opinion on what should be done with this situation that we are currently in. And I feel that the sensible solution would be to try to encourage current drivers out of their cars and to discourage future drivers from getting into cars, and I feel way to achieve this would be to have a mass transit system combined with a substantial increase in neighborhood bus service, taking people from the neighborhoods to area park and rides where they can catch a bus and take them -- or catch a train and take them to where they want to go.	The Preferred Alternative is designed to provide a multimodal solution to congestion and other mobility problems in the I-405 corridor. Transit and nonmotorized modes are included in that solution.

Code Number			Name	Comment	Response
T53	ALT	1	Kevin Gooding 7453-133rd Avenue Southeast Newcastle Agency: Public	So I just want to say that option 1 is the best solution. I feel this would be the most effective and efficient method of moving people around and also getting people off the the roads.	Please see response to comment E15.ALT-1.
T54	O	1	Roger Harbin 16235 Northeast 112th Court Redmond. Agency: Move On 405	It's a much better approach if the legislature has in front of them a good plan to review, a good plan that the public can look at and say yes, if we approve, here's some taxes, here's some funding. This is what we're going to get for the money that we spend. So that's why I think that the effort over the last few years on the I-405 corridor program is so useful and so valuable because we can put in front of the public that makes some sense.	Thank you for your comment.
T54	ALT	1	Roger Harbin 16235 Northeast 112th Court Redmond. Agency: Move On 405	In particular standing out among the alternatives that are considered, in our opinion, is the preliminary preferred alternative or Alternative 3. Let me say that I think the reason I share that is it does three very important things in my opinion. First it adds general capacity and it adds enough to do a meaningful job.	Please see response to comment L12.ALT-1.
T54	TR	1	Roger Harbin 16235 Northeast 112th Court Redmond. Agency: Move On 405	If you just added one lane, I don't think that would be enough. Some people claim that if you add general capacity, it just goes up to meet it. And I think there's actually some proof to that. And the reason that happens is that right now a lot of people are traveling parallel arterials in the neighborhoods, and we'd really like those people to get off the parallel alternatives and out of the neighborhoods and back on the freeways where they can move back and forth. If we only added one lane in each direction, it probably would fill up fairly quickly with people coming up out of the neighborhoods. In fact if we don't do anything, by 2020 the DOT data in the EIS suggests that by 2020 there will be more people in the neighborhoods and parallel alternatives than there will be on the freeways itself.	This effect is documented in the Final EIS in Section 3.12.2.
T54	TR	2	Roger Harbin 16235 Northeast 112th Court Redmond. Agency: Move On 405	The second is it has choice because it does substantially increase the bus rapid transit capacity. It does that by additional HOV, fly over, park and rides, and most important, add frequency. It's very important to have buses come by frequently enough so that people will be willing to take the bus.	The Preferred Alternative is designed to provide a multimodal solution to congestion and other mobility problems in the I-405 corridor. Transit and nonmotorized modes are included in that solution.

Code Number			Name	Comment	Response
T54	FATE	1	Roger Harbin 16235 Northeast 112th Court Redmond. Agency: Move On 405	Finally it has the least environmental impact of alternatives 2, 3, and 4. And one measurement of that is the riparian or stream encroachments. So I'm very much in support of Alternative 3. I think it's the right choice.	The co-lead agencies share your assessment of Alternative 3, with some changes presented in the Final EIS for the Preferred Alternative, that it is the right choice.
T55	SOL	1	Kevin Shively Agency: Transportation Choices Coalition / Sensible Solutions for 405 Coalition	We're a coalition of statewide, non-profit organizations that are pushing another alternative that I hope you will consider before preparing the final environmental impact statement, that's Alternative Number 5. And it's what we're calling a triple win alternative that has a combination of road investments, transit improvements, trip reduction incentives that we feel can be implemented in about half the time of Alternative 3, the preliminary preferred alternative, and about also half the cost. Our proposal is a package of investments with a price tag of about 3.1 billion dollars.	Please refer to later responses and response to comment E66.SOL-1.
T55	SOL	2	Kevin Shively Agency: Transportation Choices Coalition / Sensible Solutions for 405 Coalition	For those of you that are not familiar with the Alternative Number 5, I just want to briefly highlight some of the projects and programs it includes. For our roads element, we are supporting significant new capacity on the roads in the 405 corridor, and we'd like to focus this new capacity investment in the most congested part of 405 corridor, which is the southern section from the Interstate 5 into Interstate 90. We're supporting two new lanes to the freeway and additional capacity, two new lanes on SR 167 to the county line, and that's one lane in each direction. We're also hoping to fix some of the other congestion bottlenecks along the corridor to the north so we're supporting auxiliary lanes, improvements to various interchanges throughout the corridor and truck lanes in spots where trucks have been a problem creating congestion.	Please refer to later responses and response to comment E66.SOL-1.
T55	SOL	3	Kevin Shively Agency: Transportation Choices Coalition / Sensible Solutions for 405 Coalition	For our transit element, we're supporting elements in three distinct areas. We support -- we're asking that the department of transportation analyze an alignment for transit along the roads of the northern Santa Fe alignment that goes along the entire 405 corridor. And we're asking them to locate diesel rail/bus option for that corridor. In addition we support bus rapid transit on arterial streets, on the east/west arterial streets, and at activity centers, and then additional service in the existing HOV lanes up and down Interstate 405 itself.	The transit element proposed is similar to Alternative 3 and the Preferred Alternative except that the I-405 Corridor Program alternatives do not propose diesel multiple units operating along the BNSF.

Code Number			Name	Comment	Response
T55	SOL	4	Kevin Shively Agency: Transportation Choices Coalition / Sensible Solutions for 405 Coalition	The third element of our plan is an innovative program of trip reduction incentives. We're hoping to give powerful incentives to employers and their employees to reduce the number of commute trips that are occurring during the peak periods of the day that really cause the congestion problems we're all struggling with on Interstate 405. And we'd also like to promote bikes and pedestrian activity centers with some specific investments in the infrastructure for those options. In total, we ask you to consider this 5th alternative before making a decision.	The TDM program included in the Preferred Alternative provides substantial incentives for employee trip reduction.
T56	SOL	1	Edith Gillis 18521 - 53rd Avenue Northeast Lake Forest Park Agency: Public	I'd like to thank this committee for allowing us to speak today. I'm asking you to analyze Alternative 5 that's been posed by Sensible Solutions for 405. And the reason is the 8 billion dollar price tag is just not feasible with the current climate here in Washington State. There are just too many competing needs.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T56	ROW	1	Edith Gillis 18521 - 53rd Avenue Northeast Lake Forest Park Agency: Public	Also the impact on people in the corridor will be too great specifically for two reasons. 1400 properties will have to be taken to account for the four additional lanes on 405,	To improve transportation, environmental impacts are expected and include right-of-way acquisition. Not all acquisitions will displace property owners. Right-of-way acquisition requirements are estimated on a parcel basis and include numerous projects in addition to the I-405 lane improvements. Not all parcels require the acquisition of entire lots. In many instances, acquisitions will only consist of strips of property with minor impacts to residences or businesses on the property. Further, all acquisitions will be pursuant to the Uniform Real Property Relocation and Acquisition Act, which has safeguards built in to ensure property owners are dealt with fairly when property is acquired for a federally funded project.
T56	TR	1	Edith Gillis 18521 - 53rd Avenue Northeast Lake Forest Park Agency: Public	and the impact of traffic through the neighborhoods to get to -- for us to get to the new capacity on 405 will worsen, not improve the problem of pass-through traffic to 405.	The action alternatives include improvements to connecting arterials to I-405 to ensure that people can efficiently access I-405 without using neighborhood streets.
T56	SOL	2	Edith Gillis 18521 - 53rd Avenue Northeast Lake Forest Park Agency: Public	So we must seek an affordable alternative, a sensible alternative that will really address the needs of the people along the corridor, that will help improve our neighborhoods, not hurt our neighborhoods, and then also take into account the environmental impact. So I urge you to analyze the sensible alternative, analyze Alternative 5, the triple win alternative, before you make a final decision.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
T57	O	1	Leon Skiles 4424 Southwest Pasadena Street Portland, Oregon. Agency: Thousand Friends of Washington, Sensible Solutions to I-405	I'd like to say first that it's a good EIS, but I do think there's room for improvement that could be done. One, there could be a better decision making document that's more comparative and provides more detail of the option levels.	Thank you for your comment.
T57	TR	1	Leon Skiles 4424 Southwest Pasadena Street Portland, Oregon. Agency: Thousand Friends of Washington, Sensible Solutions to I-405	Second, I think you could go back and look at some of the data for inconsistencies and some errors that I found, in particular showing about travel times in the year 2020 as being physically the same as 1999 travel times. This doesn't seem to pass the common sense threshold. So I'd go back and look at some of the data.	Data have been reviewed and updated where appropriate in Section 3.12.4.1 of the FEIS. We were not provided specific citations of purported data errors by the commenter. Please refer to the response to comment L41.TR-7 for a discussion of the travel time issue addressed in your comment.
T57	LU	1	Leon Skiles 4424 Southwest Pasadena Street Portland, Oregon. Agency: Thousand Friends of Washington, Sensible Solutions to I-405	And third, and I think most important, I think you need to go back and look at some of the implications of some of the larger build freeway alternatives on land use. Portland has been on the forefront of identifying the effect that transportation can have on land use, and what they found was that major urban freeways had the greatest impact in the rural fringes and actually leads to sprawl. So I think the EIS is deficient in that realm.	The impacts to land use were identified on a corridor level. The issues of growth are tied to the regional and local adopted land use plans, not the I-405 Corridor Program.
T57	SOL	1	Leon Skiles 4424 Southwest Pasadena Street Portland, Oregon. Agency: Thousand Friends of Washington, Sensible Solutions to I-405	there really are problems in the corridor and there needs to be action in the corridor. But what we've found is that it needs to be affordable, and the option we put together is 3 plus billion dollars is I think much more affordable than the major alternatives in the EIS. And I can speak from personal experience of the light rail project that failed under the weight of its own expense and had to be resurrected and come back is now being built in north Portland at about a quarter of its original cost.	Thank you for your comment.

Code Number			Name	Comment	Response
T57	TR	2	Leon Skiles 4424 Southwest Pasadena Street Portland, Oregon. Agency: Thousand Friends of Washington, Sensible Solutions to I-405	The important thing is to make sure that you address issues of transportation in the corridor, and I think a very important way is to look at the Burlington Northern with the potential of bus rapid transit on the Burlington Northern or much more affordably, diesel rail on the corridor. And I'm actually working on a project in Portland that's doing that same type of conversion.	The transit element proposed is similar to Alternative 3 and the Preferred Alternative except for the diesel multiple units along the BNSF. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
T57	SOL	2	Leon Skiles 4424 Southwest Pasadena Street Portland, Oregon. Agency: Thousand Friends of Washington, Sensible Solutions to I-405	Another point is that you need to have much more, I believe, arterial improvements within the corridor, much more local access, and there needs to be a step in the process to have a refinement of your transit alternatives and bring them up in much greater detail. So thank you very much.	The transit element proposed is similar to Alternative 3 and the Preferred Alternative. The Preferred Alternative supports implementation of supporting arterial improvements within the corridor (more than the number suggested by the Sensible Solutions Coalition).
T57	SOL	3	Leon Skiles 4424 Southwest Pasadena Street Portland, Oregon. Agency: Thousand Friends of Washington, Sensible Solutions to I-405	What I would like to do is leave you with a little pamphlet, and I only have one, but it's the actual rail car that Washington County is working to acquire for a similar corridor to the Burlington Northern.	Thank you for leaving the pamphlet.
T58	O	1	Gordon Alberti 17414 Northeast 35th Place Redmond Agency: Public	In fact, we're one of the few states -- there may be others -- that doesn't have performance audits, which very well could address a lot of these problems with these costs varying from 3 to 8 billion dollars.	Thank you for your comment.
T58	O	2	Gordon Alberti 17414 Northeast 35th Place Redmond Agency: Public	Now, back to the roads. I come here in 1967 from Seaside, Oregon. Folks, I'm looking at the same pictures that I saw 38 years ago. I see the perk charts. It's just one big circle and that's all you've got. I think that the state -- they probably have a pretty good idea which one they want to build, but they have to go through the formality of these hearings. That's fine. But you've overdone it.	Thank you for your comment.

Code Number			Name	Comment	Response
T58	COST	1	Gordon Alberti 17414 Northeast 35th Place Redmond Agency: Public	You talk about the cost. You probably could have done this whole project 38 years ago for 2 billion. Now it's up to 8. You people are complaining about the cost. Every day of delay is another 500,000 or 200 million dollars or whatever the figure is.	Thank you for your comment.
T59	SOL	1	Mark Auerbach 927 North 91st Street Seattle Agency: Amalgamated Transit Local Union 587	We urge the DOT to give serious consideration to the Alternative 5 proposal under development by the Sensible Solutions for 405 group.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T59	O	1	Mark Auerbach 927 North 91st Street Seattle Agency: Amalgamated Transit Local Union 587	Alternative 5 is a balanced, fiscally responsible proposal. It's likely to yield the greatest long-term benefits with the least cost and least damage to our environment and quality of life. Perhaps the most importantly, the reasonable price tag makes it an option that might just be implemented within our lifetimes.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T59	TR	1	Mark Auerbach 927 North 91st Street Seattle Agency: Amalgamated Transit Local Union 587	We support Alternative 5's proposal for transit enhancements in three areas, to include high capacity transit along the existing BNSF right of way, transit service improvements along I-405 and service improvements along major east/west arterials. Experience in delivering transit service on the retail level confirms what the studies all say, destinations are incredibly diverse and East Side commuters are traveling to homes and jobs throughout the East Side. In order to get the most out of transit investments on 405, we need to make associated investments in transit service and get people to and from the corridor with the greatest speed and least inconvenience.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions. The Preferred Alternative includes a diverse transit component based upon buses and bus rapid transit. Alternatives 1 and 2 analyzed a fixed-guideway rail system. However, it was determined that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Also, please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
T59	TR	2	Mark Auerbach 927 North 91st Street Seattle Agency: Amalgamated Transit Local Union 587	Developing a rational plan for transit investments requires starting with service. We believe DOT should work with the existing transit agencies to develop service plans for the three areas identified in Alternative 5. Once service plans were developed, we would make sound decisions regarding capital investments that will efficiently support the service plans.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions for 405. WSDOT has been working extensively with transit service providers to develop a refined transit service plan for each of the alternatives studied in the DEIS. Several of these plans are very similar to the Sensible Solutions proposal. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
T59	O	2	Mark Auerbach 927 North 91st Street Seattle Agency: Amalgamated Transit Local Union 587	We recommend that DOT prepare a supplemental EIS for transit service enhancement and transit related capital investments in the three areas identified by Sensible Solutions for 405.	The co-lead agencies have reviewed all public and agency comments and have concluded that the information contained in the I-405 Corridor Program EIS is accurate and sufficient to reasonably capture and communicate the likely effects of the Sensible Solutions proposal without requiring supplemental evaluation. Your comment does not provide adequate justification to prepare a supplemental environmental impact statement. Please refer to the response to comment E66.SOL-1.
T60	TR	1	Melissa Briody 4132 Brooklyn Avenue Northeast Seattle 98105 Agency: Public	because my taxpayer dollars would be supporting this project, I wanted to ask that you look at the issue of pricing. So I'm just going to read some very short sections of this article. "Traffic that is gridlocked reflects an imbalance between road supply and road demand. The reason for the imbalance is that most highways are priced incorrectly the the primary method for paying for roads is the gas tax. Unfortunately, that tax tells the motorist nothing about the relative scarcity of roadway space at certain times of the day, and it is just a sales tax on fuel. So once paid, the motorist perceives the cost of road access to be essentially free. "The solution to this problem is peak period road pricing, also known as congestion pricing. Peak period pricing is a road-user fee that varies with the time of the day, location and direction of travel. This concept is not a new one to most consumers. It's widely used in matinee movie pricing, time of day rates for long distance phone calls and off-season discounts for vacation resorts. "Peak period tolls are collected through electronic systems that users essentially pay on the fly. Motorists establish private accounts, keep track of payments, measuring use on a computer."	The potential for road pricing is being considered as part of the Preferred Alternative design and operations.

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T60	TR	2	Melissa Briody 4132 Brooklyn Avenue Northeast Seattle 98105 Agency: Public	The regional government in Portland, known as Metro, recently finished a three-year study on peak period pricing and found that it would increase peak hour speeds by an average of 54 percent on regional highways without a need for new highway construction. And in measuring all costs against all benefits, including time savings, reduced fuel consumption and lower air pollution, Metro found that the social benefits of such pricing would exceed the costs by at least 130 million annually. So peak period pricing in Seattle would benefit both private auto users and transit customers. Currently one of the arguments against buses and other forms of road-based transit is that riders get stuck in traffic. With peak period pricing that problem would disappear.	The Executive Committee recommended further consideration of congestion pricing as part of a regional strategy.
T61	PPA	1	Phil Noble 3720-140th Avenue East Bellevue Agency: Bellevue City Council / Executive Committee for the 520 project	The Bellevue City Council supports the preferred preliminary preferred alternative and feels that best meets the needs of our region and best meets the needs of the city of Bellevue.	Please see response to comment E29.SOL-1.
T61	TR	1	Phil Noble 3720-140th Avenue East Bellevue Agency: Bellevue City Council / Executive Committee for the 520 project	There's no question that 405 is congested. All you have to do is be on it and recognize that there are serious problems. Roadway congestion has increased over 200 percent over the past two years on that particular roadway. Population and employment population is expected to mushroom over the next few years and to become much worse. The recognition of the problem is shown by WSDOT's recent polls showing that 94 percent of the residents show -- indicate that 405 congestion is serious or very serious. Therefore, something must be done.	Thank you for your comment regarding growth and congestion problems along I-405.
T61	O	1	Phil Noble 3720-140th Avenue East Bellevue Agency: Bellevue City Council / Executive Committee for the 520 project	405 is particularly important with respect to the city of Bellevue. It runs right smack through the middle of our county. It's an important way for our citizens to get around. It is significant and important for our business population both in downtown and elsewhere to survive, and in particular it is important for our neighborhoods because if 405 doesn't work, there is cut-through traffic through our neighborhoods. I constantly hear that all the time. A 405 adequate solution is critical to the city of Bellevue.	Thank you for your comment.

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T61	PPA	2	Phil Noble 3720-140th Avenue East Bellevue Agency: Bellevue City Council / Executive Committee for the 520 project	Therefore, the city of Bellevue and I support the preferred alternative because it provides the best option, providing congestion relief.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Also, see response to comment E29.PPA-1.
T61	SOL	1	Phil Noble 3720-140th Avenue East Bellevue Agency: Bellevue City Council / Executive Committee for the 520 project	The city of Bellevue and I support a mixed-mode alternative to the 405 issue. That means expanded general capacity. That means providing reasonable HOV and transit solutions. It means better connectivity with freeways and other intersections and it means transportation managing enhancements. All of those are provided in the preliminary preferred alternative.	Thank you for your comment.
T61	SOL	2	Phil Noble 3720-140th Avenue East Bellevue Agency: Bellevue City Council / Executive Committee for the 520 project	The other alternative that has been presented to us tonight, Alternative Number 5, we believe -- at least I believe -- does not meet those criteria. A cost/benefit analysis shows that the preliminary preferred alternative provides better congestion relief than Alternative 5 which you've been hearing about. For the extra money we get extra bang for the buck, and we believe it is worthwhile to make that extra commitment in terms of money.	Please refer to the response to comment E66.SOL-1 regarding the Sensible Solutions for 405 proposal.
T61	SOL	3	Phil Noble 3720-140th Avenue East Bellevue Agency: Bellevue City Council / Executive Committee for the 520 project	I also note that as part of the proposal, they're talking about enhancements for north/south arterial projects. I read that 148th Avenue Bellevue, and that is not feasible in my city. The city of Bellevue supports the proposed alternative.	Please see the response to your comment T61.PPA-2.

Code Number			Name	Comment	Response
T62	PPA	1	Steve Coleman 4000-140th Avenue Northeast Bellevue 98005 Agency: Public	I'm asking you to approve Preliminary Preferred Alternative Number 3. After almost two years of work, study and analysis on the I 405 Corridor Study Citizen's Advisory Committee, it is obvious to me that preliminary preferred alternative is the best option. The preliminary preferred alternative proposes the balanced transportation solution. It includes roadway, transit and environmental enhancements working together as a complete and integrated system. The preliminary preferred alternative calls for up to two new general purpose lanes, creates HOV to HOV connections, addresses all currently jammed bottlenecks along the corridor and adds a bus rapid transit system and transportation demand measures. The preliminary preferred alternative helps with concurrency and the growth management act by providing the necessary infrastructure to support development within the urban growth boundary.	Please see response to comment E29.SOL-1. Also, please refer to the response to comment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative.
T62	LU	1	Steve Coleman 4000-140th Avenue Northeast Bellevue 98005 Agency: Public	Without the multimodal investment in our major transportation facilities, like I-405, this region won't be able to live up to the promises and potential of the growth management act.	Please refer to comment response L40.LU-2.
T62	ALT	1	Steve Coleman 4000-140th Avenue Northeast Bellevue 98005 Agency: Public	In conclusion, I encourage support of Alternative 3.	Please see response to comment L12.ALT-1.
T63	COST	1	Margaret Kitchell 911-20th Avenue East Seattle Agency: Livable Communities Coalition	Our coalition, the Livable Communities Coalition, is concerned that the cost of these alternatives is too high, both in dollars and in environmental and social costs. In preferred Alternative 3, the dollar cost of the general purpose road capacity is 5 billion dollars, and the cost in air quality, global warming gases, noise, neighborhoods, accidents and induced traffic would be high.	An analysis of the benefits and costs of alternative approaches to traffic and transportation improvements was completed following procedures outlined in the Surface Transportation Efficiency Analysis Model (STEAM), developed by the Federal Highway Administration. Indirect social costs were included in the analysis. Alternative 3 provides the most cost-effective mix of projects of the action alternatives with a low estimated return on investment of 1.10 and a high estimated return of 2.11.
T63	SOL	1	Margaret Kitchell 911-20th Avenue East Seattle Agency: Livable Communities Coalition	It is very good that each alternative has transportation demand management.	Thank you for your comment.

Code Number			Name	Comment	Response
T63	TR	1	Margaret Kitchell 911-20th Avenue East Seattle Agency: Livable Communities Coalition	However, for Alternative 3 it's only one percent of the total. And I'm concerned because the draft environmental impact statement made assumptions that this relatively small investment would reduce the environmental and congestion cost of the road. I believe this is very questionable.	The TDM program proposed in each of the action alternatives is one of the most extensive demand management programs considered in a major urban corridor within the United States. The DEIS documents that the investment of roughly $20 million annually would produce substantial benefits in terms of demand reduction.
T63	SOL	2	Margaret Kitchell 911-20th Avenue East Seattle Agency: Livable Communities Coalition	I urge you to study Alternative 5.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the Sensible Solutions for 405 proposal. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T63	LU	1	Margaret Kitchell 911-20th Avenue East Seattle Agency: Livable Communities Coalition	Few people like sprawl, and our vision is to have communities that are more compact with housing, jobs, shopping and churches closer together. We would then have access to what he want without having to travel as far. We could walk, bike, take transit and drive less. It's interesting because not only would there be fewer global warming gases, but we'd be physically healthier also. The center for disease control is very concerned about sky-rocketing obesity rates, and this form of communities would encourage walking and biking. Alternative 5 has room for smart growth. Growth is undoubtedly coming, but it can be managed.	Please see comment responses L27.LU-1, T29.LU-1, and E66.SOL-1.
T63	SOL	3	Margaret Kitchell 911-20th Avenue East Seattle Agency: Livable Communities Coalition	We certainly do agree that there needs to be a strategic investment in choke points. There are parts in the south that are extremely congested and improvement in this would be urgent.	The Preferred Alternative includes improvements to all major bottlenecks within the corridor.
T63	O	1	Margaret Kitchell 911-20th Avenue East Seattle Agency: Livable Communities Coalition	Our coalition believes that we need to look both at the dollar cost and what would keep our communities healthy, equitable and sustainable. We have a vision for growth that would make it healthy and sustainable. We urge you to study Alternative 5.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the Sensible Solutions proposal. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
T64	SOL	1	Renay Bennett 826-108th Avenue Southeast Agency: Public	I would just like to say that I believe that adding more lanes will not solve any of our problems. Even with our future forecasted growth levels, adding these additional lanes, we would still be gridlocked when they're all completed. So years of construction and billions of taxpayer dollars and we'd be in the same boat we are in now. These tax dollars would be better spent on fixing the choke points and in improving transit in whatever form that may take.	Please also refer to comment E66.SOL-1 response.
T64	N	1	Renay Bennett 826-108th Avenue Southeast Agency: Public	My neighborhoods will be greatly impacted by these additional lanes on 405. The noise from 405 right now is awful, and four more lanes will be unbearable. I am uphill from 405, and noise walls have not helped me.	As shown in Table 3.2.-9 of the Draft EIS, traffic noise in the I-405 corridor will increase in the future under all of the alternatives, including No Action. Even if the maximum noise levels do not increase, the number of hours per day with high traffic volumes would increase. Mitigation measures such as noise walls to reduce the noise at areas where noise impacts are determined will be evaluated as specific designs are developed for areas of the corridor. Noise walls would be provided in areas of impact where topography allows and housing density supports their construction. Unfortunately, there are areas where noise mitigation near the roadway can not effectively reduce noise levels. Installation by the property owner of thermal-pane windows or a solid fence on the private property can be effective in some cases. The WSDOT acoustics group can provide advice to homeowners on measures the homeowner can take to reduce noise.
T64	AQ	1	Renay Bennett 826-108th Avenue Southeast Agency: Public	The air quality right now is not very good at all, and more traffic is worse air quality.	See response to comment E296.AQ-1.
T64	FATE	1	Renay Bennett 826-108th Avenue Southeast Agency: Public	I believe that the EIS needs further refined analysis. There are many environmentally sensitive areas along 405, and they are so sensitive that the Endangered Species Act restrictions have been imposed on them. We cannot afford more devastation to these areas.	FHWA and WSDOT will be initiating programmatic Section 7 consultation under the ESA with NMFS and USFWS on the I-405 Corridor Program Preferred Alternative. FHWA and WSDOT will be working with NMFS and USFWS to define the best method for consultation on a programmatic level. In-depth consultation may be required at the project level. WSDOT has also prepared a Draft Proposed Early-Action Environmental Impact Mitigation Decision-Making Process document. This document coordinates specific programmatic basin-level mitigation with WRIA 8's forthcoming "Near Term Action Agenda" for basin-level mitigation. The Final EIS and programmatic consultation adequately address all ESA-listed species found in the project area in a manner consistent with a programmatic analysis, thus meeting the legal obligation to protect local evolutionarily significant units. Please also see response to L62.FATE-3.

Code Number			Name	Comment	Response
T65	SOL	1	Bernie Goddard 802-108th Avenue Southeast Bellevue Agency: Public	I'm in favor of mass transit along the 405 corridor rather than just adding more lanes of traffic.	Alternative 2 - Mixed Mode with HCT/Transit Emphasis, and Alternative 3 - Mixed Mode Emphasis, would both provide a new mass transit system and additional lane capacity in the I-405 corridor. Please refer to Chapter 2 of the I-405 Corridor Program Draft EIS for a discussion of these alternatives and the improvements and modal elements that are contained in each.
T65	AQ	1	Bernie Goddard 802-108th Avenue Southeast Bellevue Agency: Public	The noise, light and contaminants that will be added to our neighborhood by adding four lanes of traffic would be unbearable.	See response to comment E296.AQ-1.
T65	N	1	Bernie Goddard 802-108th Avenue Southeast Bellevue Agency: Public	The noise level in my home as well as in my neighbor's homes is really loud as it is. Now, that's not a number that you can understate it. But but how about 62 DB versus the maximum level in Bellevue of 66. And I'm two houses from the woman that just spoke. When the noise barrier was added along the east side of 405 from Southeast 8th to I-90 roughly, my noise level increased greatly. And I'm sorry; I don't have the numbers, but the bounce off the wall coming up the hill was tremendous. This problem will only increase if more lanes are added to I-405. If transit lanes were added, the noise would not be constant, but would occur occasionally.	Traffic noise in the I-405 corridor will increase in the future under all of the alternatives, including No Action. Noise is not eliminated by noise barriers, but the average noise level is reduced. Often noise from individual trucks becomes more noticeable as a result of reduced background noise.
T65	WR	1	Bernie Goddard 802-108th Avenue Southeast Bellevue Agency: Public	Also by having more lanes of traffic, we will increase the pollution in all of our streams and lakes, which we cannot tolerate.	Potential impacts and mitigation measures of the different alternatives to water resources are analyzed in Section 3.5 of the Final EIS.
T65	O	3	Bernie Goddard 802-108th Avenue Southeast Bellevue Agency: Public	We must not act in haste, but rather in a timely plan that is carefully planned.	Thank you for your comment.
T65	SOL	2	Bernie Goddard 802-108th Avenue Southeast Bellevue Agency: Public	For example, if the I-405/167 interchange was provided, the flyover moved as proposed, would alleviate traffic much quicker than adding lanes which suck traffic from Interstate 5 to Interstate 405.	An interim project at this interchange will provide short-term relief, but additional corridor capacity is needed to meet the growth in travel demands during the next 20-30 years.

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T65	O	4	Bernie Goddard 802-108th Avenue Southeast Bellevue Agency: Public	Please protect our neighborhoods and our environment.	Thank you for your comment.
T66	ALT	1	Anirudh Sahni 417 Harvard Avenue East Seattle Agency: Public	And I'm against Alternative 3 because I think it doesn't do enough for mass transit.	Please see response to comment C3.ALT-2.
T66	O	1	Anirudh Sahni 417 Harvard Avenue East Seattle Agency: Public	Now, as you know, Alternative 3 was chosen as a result of the cost/benefit analysis. I looked at the cost/benefit analysis and I have several major problems with it. I'd just like to point out a few of my favorite ones. Of course it looks only 20 years into the future. Now, I grew up in a city in India which is considered young because it is only 300 years old. Seattle is 150 years old already. Bellevue's going to be around a lot more than 20 years. What's 20 years? That's nothing.	The planning horizon for modeling traffic is 20 to 30 years.
T66	SOL	1	Anirudh Sahni 417 Harvard Avenue East Seattle Agency: Public	So I think the Bellevue and the Washington State should be investing more in mass transit which takes more time to be adopted, but it's much more cost effective in the long run.	The Preferred Alternative is designed to provide a multimodal solution to congestion and other mobility problems in the I-405 corridor. Transit and nonmotorized modes are included in that solution.
T66	O	2	Anirudh Sahni 417 Harvard Avenue East Seattle Agency: Public	The second problem I have with the study is that it counts time spent riding a bus when counting costs and then -- the costs of time spent riding a bus or train the same as the cost of time spent driving a car. So in other words given the choice between a 30-minute car drive and a 35-minute bus ride, it considers the bus ride to be a greater time cost.	Time is counted only once in the analysis. Research into the value of time shows that there is no single value of time that covers all travel experiences. In the benefit-cost analysis, added time spent is viewed as a cost. Thus, in the example provided in this comment, the bus ride will have a lower time cost than the auto trip (not higher). Because the bus

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				Now, for me, that misses the whole point. The whole reason -- so far as Microsoft people prefer to ride the bus instead of driving our cars, is that we can get stuff done on the bus, reading or working on a laptop computer. If you get on any of these commuter buses, you don't see people twiddling their thumbs. So for me, the 35-minute bus ride actually represents a 25-minute savings because I can spend 30 of those minutes working. Now, this one thing taken into account in the cost/benefit analysis, you find that it radically alters the results of the analysis because the -- in all four of them, by far the biggest benefit is in time savings.	rider is able to do something "productive" in the bus the cost of time spent in the bus is very low and is lower than the cost of driving in a car where such "productive" activities cannot be done. On the other hand, the time cost when waiting for a bus in the rain is probably valued much higher than other time. Time values also differ according to income level, for drivers versus passengers, for short trips versus long trips, and for congested auto travel versus auto travel on a scenic highway on a pleasant day. In this benefit-cost analysis, a single value of time was assumed for personal travel as a simplifying assumption. This is a common assumption in benefit-cost studies performed for analysis of transportation alternatives. Much more data must be generated and analyzed to conduct an analysis with different values of time for different modes and/or user groups, and changing the value of time in this manner would not be likely to affect the conclusions of the analysis in a material way.
T66	O	3	Anirudh Sahni 417 Harvard Avenue East Seattle Agency: Public	Now, the third problem is they just ignore the question of -- the study ignores the question of who pays or gives very little emphasis to the question of who pays. Now, when I drive my car at peak hours, I consume about 25 times as much road capacity as when I ride the bus. If you look at the distance between me and the car in front of me and compare it to the distance between myself in the bus and the passenger in the seat in front of me and see how that compares. So I should be paying five times as much for the road.	The physical separation of vehicles is considered in the performance evaluation. The issue of who pays for the improvements is part of a companion funding and implementation program.
T67	SOL	1	Robert Pregulman 1550-12th Avenue West Seattle Agency: Washpirg	I'm here to speak against the preferred alternative brought by Washington DOT on several fronts, primarily because it will not solve traffic problems and will at the same time increase sprawl and pollution.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Alternative 3 - Mixed Mode Emphasis, is the Draft EIS alternative that would affect employment and housing most like the preliminary preferred alternative. As discussed in Section 3.23.3.5 of the I-405 Corridor Program Draft EIS, the growth pattern associated with Alternative 3 indicates that pressure for growth outside the urban growth area would be reduced in comparison to the No Action Alternative. Chapter 3 of the Draft EIS acknowledges that all of the alternatives would increase pollution prior to implementation of mitigation measures. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.

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T67	TR	1	Robert Pregulman 1550-12th Avenue West Seattle Agency: Washpirg	Last fall we released a report called Breaking the Gridlock that found that building new roads does not alleviate traffic and actually attracts new traffic to those roads causing more congestion. Our report was based on a study done by the Texas Transportation Commission that studied 70 different urban areas over a span of 15 years. An example of that did happen here in Washington. Development on the east side of Lake Washington increased significantly in the '80s. In the late '80s, roads and bridges became heavily congested, and as a result, in 1989 the DOT attempted to solve the problem by expanding the capacity of one of the floating bridges on Interstate 90 to decrease traffic congestion. Taxpayers paid 1.4 billion dollars on a 6.9 mile project. The first month newly added lanes were put to use, cars traveling over the bridge jumped from 65,000 to 104,000 per day. The DOT surveyed pattern of surrounding arterial options, including State Route 522 and the 520 bridge, and found no significant decrease in traffic there, meaning that significant traffic increases across I-90 was not the result of commuters changing their travel routes. Building new lanes only encouraged more people to drive doing nothing to alleviate traffic congestion.	Please refer to the response to comment E66.SOL-1. We have not analyzed historical effects on the I-90 corridor in association with other roads within the region. I-90 traffic conditions substantially improved after the expansion was completed and continues to operate better than most freeways in the region. The I-405 Corridor Program acknowledges that induced travel will occur in response to transportation improvements. Most of these effects have been accounted for in the I-405 travel forecasts. Please refer to the response to comment E66.SOL-1 for discussion of induced demand.
T67	SOL	2	Robert Pregulman 1550-12th Avenue West Seattle Agency: Washpirg	We do support Alternative 5 introduced by the Transportation Choices Coalition, which encourages smart growth, trip reduction and public transportation options.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

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T67	TR	2	Robert Pregulman 1550-12th Avenue West Seattle Agency: Washpirg	And I can speak from experience. I came here from Atlanta, Georgia. I lived there for four years. They have three major freeways that converge on that city, I-20, I-75 and I-85, plus another freeway that goes all the way around the city. Each one of those freeways in the city used to be two lanes. In the early '80s, they expanded all of them in the city to having seven lanes on each side to increase capacity and reduce congestion. Right now I can tell you that Atlanta has some of the worst traffic problems in the country. It has done nothing to alleviate traffic congestion. It has increased sprawl, pollution, and when Atlanta did build all those roadways, it did nothing to increase bus service. It did nothing to significantly increase mass transit, and that was their major mistake. I hope you don't make that mistake as well.	Thank you for your comment.
T67	SOL	3	Robert Pregulman 1550-12th Avenue West Seattle Agency: Washpirg	We're not saying we're against all road building. Some road building is necessary, but you have to include transit. You have to include bus options, and that's why we support Alternative 3 and hope you'll consider it. Five, sorry.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. Alternative 1 - HCT/TDM Emphasis, and Alternative 2 - Mixed Mode with HCT/Transit Emphasis, both include a physically separated, fixed-guideway high-capacity transit system potentially using some form of rail technology within portions of the BNSF right-of-way. However, it was determined that Alternative 1 would not meet the adopted purpose and need for the I-405 Corridor Program because of its inability to provide meaningful long-term improvement in general purpose mobility, freight mobility, or reduction in foreseeable traffic congestion. The basis for this conclusion is discussed in greater detail under operational impacts in Section 3.12.4.2 of the Final EIS. Alternative 3 - Mixed Mode Emphasis, would implement a high-capacity transit system throughout the study area using bus rapid transit (BRT). In addition, all action alternatives include an increase in transit service ranging from 50 percent up to 100 percent. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Also, please refer to the response to comment E66.SOL-1.

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T68	TR	1	Anne Phillips 4010-89th Avenue Southeast Mercer Island 98040 Agency: Public	But I don't think that adding unnecessary pavement to the whole thing -- to 405 will be a solution that will help anything because I think if you build those lanes, more cars will come to fill them up.	Please refer to the response to comment E66.SOL-1 for discussion of induced demand.
T68	WR	1	Anne Phillips 4010-89th Avenue Southeast Mercer Island 98040 Agency: Public	I want to talk about pavement for a minute. Four acres of pavement for 30 miles is the equivalent of about 160 acres. Impervious surface sheds water and contributes to flooding and water pollution. Mix up pollution with it and carries it into streams, hurting the water quality, and this is a very bad situation, especially with the traffic. The pollution from traffic carries heavy metals; it's toxic like oil and coolant particulates from exhaust. It's just a very unhealthy environment and I don't believe we should add to it.	All project runoff will be treated to reduce the levels of contaminants in stormwater runoff. For those streams known to suffer from higher metals concentrations, such as Springbrook Creek, additional treatment to remove heavy metals may be required as mitigation. The individual road projects will present opportunities to provide stormwater treatment to existing roads (also known as retrofit), many of which currently have no treatment facilities. Depending upon the level of retrofit, some projects could result in a net improvement in water quality.
T68	SOL	1	Anne Phillips 4010-89th Avenue Southeast Mercer Island 98040 Agency: Public	I believe we should be creative and think of new and alternative solutions such as more incentives for van pool riders. We get no subsidy from our employers. There should be more frequent buses, more of a choice for bus riders. Perhaps there should be a toll charge for single drivers that contribute to traffic. I think that we really need to use our heads and think of better solutions.	The TDM element in the alternatives includes start-up subsidies for van-pools, "value-added" incentives (like frequent flyer miles), creation of a revolving no-interest loan fund for purchasing vans, a 50 percent fare subsidy, and owner-operated vanpool promotion. Pricing is a regional issue being considered by regional planning agencies.
T68	ALT	1	Anne Phillips 4010-89th Avenue Southeast Mercer Island 98040 Agency: Public	Alternative 3 will take a long time and will cost a lot of money and will be a real mess in the building.	Please see Section 3.12.4.4 for the construction impacts associated with Alternative 3. The co-lead agencies are currently working on a phasing and implementation plan that would minimize the construction impacts of individual projects.
T69	SOL	1	Rami Haddad 1100-106th Avenue Northeast 98004 Agency: Public	So I oppose the idea of adding lanes any time there is a slight congestion. So I would urge you to look into solutions that would increase public transit, add more bike trails and increase the service.	All of the action alternatives include improvements to public transit, such as increased service, and bicycle facilities. Please refer to Chapter 2 of the I-405 Corridor Program Draft EIS for a description of the range of alternatives, improvements, and modal elements that have been considered.

Code Number			Name	Comment	Response
T69	TR	1	Rami Haddad 1100-106th Avenue Northeast 98004 Agency: Public	I believe -- so I moved in December 2000, and I believe in all buses they had a big flier that there was about 2 million riders on the bus in the year 2000. In Vancouver BC, I think there is about 130,000 riders every day. So in a month, they have more riders than what they have in the Seattle area. What that means is that as you increase the bus service, people will actually use it. And it takes time, but people do actually end up using that service. What actually happens is that with more service, people don't need to look at the bus schedule, don't need to complain about the waiting time for the bus. They just go to the bus stop and take it.	Thank you for your comments regarding transit usage. The Preferred Alternative includes a substantial increase in transit service and coverage within the I-405 corridor.
T69	O	1	Rami Haddad 1100-106th Avenue Northeast 98004 Agency: Public	What I found that is the numbers in the EIS report and in the newsletters, I found them misleading and ostensibly biased to the preferred alternative. What I have found is I tried to get more -- it seemed like one of the gentleman who spoke was more confident of the numbers and has studied them. I had attempted to contact the I-405 quite a few times with no response.	It is not clear from your comment which numbers or newsletters are the source of concern. The I-405 Corridor Program has maintained a variety of sources to gain information and ask questions about the program, and staff have attempted to be conscientious about responding to all inquiries. The co-lead agencies apologize if you have not been well served; complaints such as yours have been extremely rare.
T69	TR	2	Rami Haddad 1100-106th Avenue Northeast 98004 Agency: Public	But one of the charts here show that actually with for the preferred alternative, there will be more people on the carpool lanes would be only one than people on the four -- percentagewise on the general purpose lanes. It seems like there will be 50 percent people on the four general purpose lanes versus 50 percent of the people on the one single carpool lane. This is what this chart shows: 50 percent versus 50 percent carpool. So I think the number is misleading and would urge you to look at them again.	The HOV lanes would carry a higher proportion of people per lane than the general traffic lanes. We cannot respond to the identified percentages since there is no reference to a specific table or figure.
T70	ROW	1	Paul Carlson 12031 Southeast 11th Street Bellevue, Washington 98005 Agency: Public	When I looked through the draft EIS here at the regional library, I counted it very difficult to figure out some of the information about the impacts and particularly the question of where the 1400 properties in Alternative 3 might be. The maps that are here tonight are of a good enough scale and clear enough that they're much more helpful than what I found in the document. And I would like to say that when I called the staff, people were helpful in returning my phone calls and helping me out.	It is difficult to incorporate a map of sufficient size into the Draft EIS document which shows right-of-way acquisitions. We encourage all interested parties to attend public meetings where maps of a larger scale with more detail are available for review. Also refer to response to comment T56.ROW-1.

Code Number			Name	Comment	Response
T70	ROW	2	Paul Carlson 12031 Southeast 11th Street Bellevue, Washington 98005 Agency: Public	But I do think when you talk about these initial plans that have some amount of detail and certainty in some parts of the corridor, but you may not know exactly where the roadway is going to go in all parts, I think it's important that neighborhoods have access to the most accurate information about how they may be affected and that that information be accessible. I'm afraid it's going to take a long, long time, and people's decisions about selling property and whether they're going to face a loss if they wait are likely to come into play here.	All acquisitions will be made pursuant to the Uniform Real Property Relocation and Acquisition Act, which has numerous safeguards built in to protect property owners' rights and ensure a fair price is paid for their property. The specific location of the acquisitions will not be known until project-specific design is underway. However a program is in place for "advance acquisition". Please contact the the Real Estate Services section of the State Department of Transportation for additional information regarding this program.
T70	N	1	Paul Carlson 12031 Southeast 11th Street Bellevue, Washington 98005 Agency: Public	The other thing about the DEIS that I would mention is that I thought the -- what I saw about the noise impact seemed to be very simplistic. There was a reference to effects of extending 600 feet from the center roadway and the geography is so different in different parts of the corridor that seemed like -- that was too much of the simplification, and certainly where I live, when the traffic starts moving, the noise goes up. When it sets still, it's much quieter. So, again, if the people in the neighborhoods have access to that information over time, that will be very helpful.	At this stage, there is not sufficient design detail to determine the noise effects of design options at specific locations; therefore, only the potential for noise increases under each of the alternatives has been evaluated. Noise impacts at specific locations along the corridor, along with mitigation measures such as noise walls, would be evaluated as specific designs are developed for areas of the corridor. Any capacity increases would include evaluation of the effectiveness of existing noise barriers and expansion of those barriers or construction of new ones as needed. Project design development would also evaluate realignment of ramp and roadway sections, where feasible, to reduce noise levels.
T71	TR	1	Linda Jones 8725-126th Avenue Northeast Kirkland, Washington Agency: Public	I want to talk about off of 405 at exit 18, State Highway 908 and 85th Street. I believe we have a problem there. I believe the traffic is at peak at that area and the volume is increasing rapidly. These roads are backing up into the exit ramp that heads east by the Lee Johnson Chevrolet car dealership. Westbound traffic is backing up for miles daily into Redmond. The 85th corridor study allocated more business zoning east of Costco by 90th Street. I believe that this problem is caused by cars turning left on to 120th Avenue, 122nd Avenue, 124th Avenue, left or north. The left or north turns are so long from the volume turning north, it holds up the flow of traffic driving west from Redmond. My solution/suggestion is that a flyover bridge connecting the eastbound exit off of I-405 to 98th Street business district Costco area or lower exit from I-405, like the Totem Lake 124th Street exit. If vehicles turning left or north on to 120th, 122nd, 124th Avenue Northeast, were to take an exit that feeds on to 90th Street, then we would have more fluid flow on Highway 908.	We will consider these ideas during the project-level design for that portion of I-405 and the interchange at NE 85th St.

Code Number			Name	Comment	Response
T71	SOL	1	Linda Jones 8725-126th Avenue Northeast Kirkland, Washington Agency: Public	I actually drew a map, and here's 405. Here's proposed freeway interchange of Alternative Number 3 like this. And taking in east or the proposed right of way of this little dotted line. My red lines here are where we could connect from the changes at that interchange and here's 85th Street, and the cars are going and turning and turning. And if they could go this way down 90th, and we already have a stoplight there and continue on 124th Street, we would eliminate all these turns which holds up the traffic from Redmond heading west into Kirkland. So all these cars have to stop waiting for all these left hand turns.	Design options for this interchange will be considered at the project-level analysis. We will add your suggestion to this analysis.
T72	O	1	Barbara Zepeda 308 Republican Street, Apartment 708 Seattle 98102 Agency: Public	The taxpayers have paid for the rail system, and I am putting on the record this statement from Margaret Tunks. I worked with her for years. "I'm just trying to use the rail system that we paid for in the last century, ripped out in this century, and I have to buy back at exorbitant cost."	Thank you for your comment.
T72	AQ	1	Barbara Zepeda 308 Republican Street, Apartment 708 Seattle 98102 Agency: Public	I don't know if you read about the diesel fumes. You run them on the rail. It's a little more efficient because there's less friction. But the diesel fumes on the highways are actually retarding our children. And I mean, those are studies that are available.	Section 3.1.1 of the EIS discusses the health affects of various pollutants associated with transportation sources.
T72	O	2	Barbara Zepeda 308 Republican Street, Apartment 708 Seattle 98102 Agency: Public	And basically the whole idea is that all transportation decisions of the future must be made for the years 2020 and 2040 and beyond.	Thank you for your comment.
T72	O	3	Barbara Zepeda 308 Republican Street, Apartment 708 Seattle 98102 Agency: Public	Seattle is the second most motor vehicle congested city in our nation, and the future of transportation of greater Seattle is not to be made by more motor vehicles on more freeways and bridges.	Thank you for your comment.
T72	O	4	Barbara Zepeda 308 Republican Street, Apartment 708 Seattle 98102 Agency: Public	There's reference books here that people should look at. They're made by people that don't make money by building highways. They're objective information that has been compiled by people who are using figures that are -- that will explain to you what the hidden costs are. On the back I've just excerpted a few graphs that we who are concerned about taxes are paying half of our property taxes for highways.	Thank you for your comment.

Code Number			Name	Comment	Response
T72	ECON	1	Barbara Zepeda 308 Republican Street, Apartment 708 Seattle 98102 Agency: Public	If you want to get the burden off the property tax, you've got to start figuring out what real transportation system would reduce that burden. And also the indirect costs that are not in your EIS are on the back of my handout here. And I urge you to check a book out of a library, Transportation for Livable Cities by Vuchic.	Thank you for your comment.
T73	O	1	Jay Arnold 105-18th Place Kirkland Agency: Public	I've lived in the Kirkland area for 12 years, and when I first moved here, projects to improve 405 were already underway, straighten out the S-curves and some other things. Looking at Preferred Alternative Number 3 made me think of that again because those projects took years to finish; it was hell going through the 405 corridor during that time, and where did we end up at the end? I look at the preferred alternative and it really appears to be solving today's problems with yesterday's technology a day after tomorrow. I'm a manager at Microsoft, and I'm not here talking on behalf of the company, but when we look at solving problems, we're looking at not only the solutions we're building, but what is the technological landscape going to be in the future. And we're talking about the preferred alternative, we're talking about over ten years of construction, and where are we going to end up at the end of it?	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. Please refer to the response to coment L6.ALT-1, which discusses differences between Alternative 3 - Mixed Mode Emphasis, and the preliminary preferred alternative. The Preferred Alternative also is similar to Alternative 3. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
T73	O	2	Jay Arnold 105-18th Place Kirkland Agency: Public	The world is going to have -- we're going to have trip growth. There's going to be move trips on the road. There's going to be population growth as we continue to attract the best and the brightest to this region to the software, biotech and other industries, and we're going to have the kids and grandkids from people in this room. We're going to have trip growth from this and also this construction impact. Add the extent of four lanes of traffic, take more right of way, and have detours and how bad is all that going to make it worse before it makes it better? In the end, where are we going to end up? It's not going to be a solution. It's not going to be better than we have today.	The Preferred Alternative is designed to provide a multimodal solution to congestion and other mobility problems in the I-405 corridor.
T73	SOL	1	Jay Arnold 105-18th Place Kirkland Agency: Public	So I would urge this group to consider Alternative 5 where you are looking at some targeted improvements in the roadway, but also looking at trip reduction, transit, HOV, bicycle and pedestrian projects. And by looking not only at where we are today, but where we would be in the future and trying to meet that in an innovative way would be much better.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.

Code Number			Name	Comment	Response
T74	O	1	Carol Nielsen 12915 Northeast 94th Street Kirkland, Washington 98023 Agency: Public	Los Angeles air quality is so bad that on Sunday people are warned to stay indoors, inside their air conditioned houses. Do we really want to be like LA? If we build more traffic lanes, we are following in their footsteps, or tire tracks if you will.	Thank you for your comment.
T74	O	2	Carol Nielsen 12915 Northeast 94th Street Kirkland, Washington 98023 Agency: Public	Other cities, generally older cities in the eastern United States and Europe move many more people than we do and more efficiently with train, light rail and buses. They have the good fortune of being well-established before the age of of the automobile. We on the West Coast have younger cities, and some of us are allowing the automobile to dictate how our cities will grow. At some time in the future, we will wish we had invested in a mass transit system. We can make that investment today.	Thank you for your comment.
T74	SOL	1	Carol Nielsen 12915 Northeast 94th Street Kirkland, Washington 98023 Agency: Public	Personally, I'd like to see a light rail system, but if we can't afford that now, let's invest in an efficient bus system, not more freeway lanes. Let's visualize the future that we really want and plan for it now. Thank you.	Thank you for your comment.
T75	COST	1	Jeannine Sieler Agency: Public	I'm here without a speech, but I am here to reiterate a few things. I don't think it's just that we have more dollars being put into it.	Thank you for your comment.
T75	O	1	Jeannine Sieler Agency: Public	We need a mass transit. We're a big city. Let's wake up out here. We are not the little podunk town we were six years ago. We are big. We need to act like Washington D.C. We need to act like San Francisco. We need to act like LA, only better, and we need to act like the cities like New York that have transit systems and fund it. Without giving tax breaks to people who commute.	Thank you for your comment.
T76	ALT	1	Suzette Cooke Agency: Greater Renton Chamber of Commerce	The Greater Renton Chamber of Commerce has participated in the I-405 corridor program process through chamber members who served on the citizen committee and periodic briefings by staff of the Washington State Department of Transportation. The Greater Renton Chamber of Commerce board of directors met on September 20th to discuss the EIS and proposed alternative solutions. It unanimously endorsed Alternative Number 3 with the emphasis on mixed mode, a bus rapid transit system with expanded bus service, two additional general purpose traffic lanes each direction on 405 and widening SR 167.	Please see response to comment L12.ALT-1.

Code Number			Name	Comment	Response
T76	SOL	1	Suzette Cooke Agency: Greater Renton Chamber of Commerce	While the board of directors supports Alternative Number 3, the board wishes to make clear it's opposition to use of the Burlington Northern/Santa Fe right of way for preservation of transportation opportunities. The Burlington Northern/Santa Fe line runs through the middle of downtown Renton and through the Kennydale and south Renton residential neighborhoods affecting such regional recreational amenities as Gene Coulon Park and the Lake Washington trail system. Use of this right of way is in conflict with the corridor's program stated goals, number one, enhanced livability for communities within the corridor, and number 2, seek opportunities to enhance environmental quality.	The I-405 Corridor Program Draft EIS acknowledges that there would be localized impacts associated with continued use of the BNSF right-of-way for transportation. However, continued use of the corridor for transportation has substantial potential to benefit communities and the environment in the larger corridor area in a way that serves the program's adopted purpose and need. The Preferred Alternative does not include a change in the current use of the Burlington Northern Santa Fe Railroad right-of-way. The I-405 Corridor Program Executive Committee sent a letter expressing support for preservation of the BNSF right-of-way and corridor to the appropriate agencies. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
T76	SOL	2	Suzette Cooke Agency: Greater Renton Chamber of Commerce	I think in light of this, they support, as is stated here, additional capacity for vehicles along with the enhancements and additional capacity for the mass transit, the bus system, et cetera.	Thank you for your comment.
T76	SOL	3	Suzette Cooke Agency: Greater Renton Chamber of Commerce	And we're very concerned that particularly while I'm here in Bellevue tonight, when you go to the Renton area, we do have one less roadway, one less lane in each direction than is accommodated here. And therefore, please consider the fact that there's a reason why it is so congested around 167 and the S-curve. It's not just the curves folks; we've got less and we want more.	Thank you for your comment.
T77	ROW	1	Cindy Mencavage 5836-114th Avenue Northeast Agency: Public	Alternative 3 would actually take away my home.	With a project of this size many residences and businesses may need to be acquired. The actual number of acquisitions and the locations will be dependent on specific project designs. All of the acquisitions will be made under the Uniform Real Property Relocation and Acquisition Act. This law ensures that property owners receive fair market value for their land and improvements and also provides payment for certain costs of relocation of businesses and residences. Also, please refer to response to E261.ROW-1.

Code Number			Name	Comment	Response
T77	O	1	Cindy Mencavage 5836-114th Avenue Northeast Agency: Public	I've also driven through Atlanta several times. And adding more pavement has not improved the road situation. It worsens the environment. It worsens the air. I can't see it being beneficial to any area.	Chapter 3 of the I-405 Corridor Program Draft EIS provides a detailed evaluation and comparison of the effects of the No Action Alternative and action alternatives. It is a goal of the I-405 Corridor Program to maintain, protect, and enhance the functions of fish and wildlife habitat, wetlands, and other waters of the state and to seek a net gain in those functions through restoration, creation, and enhancement. To help achieve this goal, WSDOT has prepared and is implementing a proposed early-action environmental impact mitigation decision-making process. There are important differences in performance and environmental effects among the alternatives.
T77	ALT	1	Cindy Mencavage 5836-114th Avenue Northeast Agency: Public	That's all I really wanted to say. So Alternative 5 I'm for. Alternative 3, I'm absolutely against.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response E66.SOL-1.
T77	O	2	Cindy Mencavage 5836-114th Avenue Northeast Agency: Public	If you were to add one lane there, it would go into my backyard. I understand. And also, whatever the decision is made that, you know, it's made quickly because as this goes out, I've already seen houses on our road not selling, and it's affecting people's decisions to remodel and improve their homes.	Thank you for your comment.
T78	LU	1	Virginia Gunby 2540 Northeast 90th Seattle Agency: Public	Thank you WSDOT and your consultant partners for providing this collaborative planning process for evaluating the programmatic programs for I-405. You're not just planning a transportation corridor, but you're involved in the de facto planning of the future of the overall development patterns of the East Side. The basic choice is between continued auto-oriented development and letting people vote with their cars for freeways or using transportation as an investment -- public investment and tool to build livable communities.	The actual land use pattern is dictated by the locally adopted plans and Washington State mandated growth management policies. The I-405 Corridor Program implements infrastructure that supports the regionally designated and directed growth within the Urban Growth Area. An assumption of growth "sprawling" into the rural areas ignores the actual role of regional and local plans that direct the growth.
T78	TR	1	Virginia Gunby 2540 Northeast 90th Seattle Agency: Public	I-405 was originally designed and paid for with 92 percent federal interstate funds to be an interstate bypass of Seattle. Today it serves primarily local trips because a system of East Side local circulation streets and arterials were never built.	I-405 carries a variety of local and regional trips. A high proportion of I-405 trips actually travel greater than 30 miles, reflecting the important regional nature of the freeway in addition to connecting cities along the corridor.

Code Number			Name	Comment	Response
T78	O	1	Virginia Gunby 2540 Northeast 90th Seattle Agency: Public	I served as a state highway and transportation commissioner in the '70s and continued my work recently to chair a two-year League of Women Voters study on ways to connect growth management and transportation. We need to start doing that much more with our transportation planning.	The I-405 Corridor Program Draft Land Use Plans and Policies Expertise Report and Draft Transportation Expertise Report examine the consistency of the alternatives with adopted state, regional, and local plans and policies related to growth management.
T78	O	2	Virginia Gunby 2540 Northeast 90th Seattle Agency: Public	There are fatal flaws relating to the recommended preferred alternative at the streamlined programmatic EIS level. It is really premature to try to have preferred alternatives at programmatic levels. I've never seen that done before in the transportation planning process. We need to compare the various alternatives in detail before making the preferred alternative decision, and that's usually done more at the project level EIS.	It is assumed that you are referring to the preliminary preferred alternative. A preferred alternative was not identified prior to or during the time that comments were being solicited on the Draft EIS. The federal regulations for implementing the National Environmental Policy Act require that the preferred alternative be identified in the Final EIS if it has not been identified in the Draft EIS (40 CFR 1502.14(e)). For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS.
T78	O	3	Virginia Gunby 2540 Northeast 90th Seattle Agency: Public	The East Side community needs to have more details of the estimated over 1 billion dollars worth of project costs that will be paid for displaced housing and businesses, and the 260 to 400 units that various alternatives will impact could impact -- that are taken the proposed I-405 revisions.	Please refer to the response to T77. ROW-1.
T78	O	4	Virginia Gunby 2540 Northeast 90th Seattle Agency: Public	I want to thank you tonight, and I want you to remember that Alternative 5 should be subject to the same review and analysis that you have given to your existing and be carried through in future analysis and detailed projects.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS; it is assumed that you are referring to the proposal identified by Sensible Solutions. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Please refer to the response to comment E66.SOL-1.
T78	O	5	Virginia Gunby 2540 Northeast 90th Seattle Agency: Public	We also want to you look at construction delays and have that included in your draft EIS -- in a supplemental draft EIS that we hope will be prepared.	The FEIS includes additional information regarding ways to mitigate the effects of construction in 3.12.5.

Code Number			Name	Comment	Response
T79	SOL	1	David Thomas 17408 Northeast 19th Place Bellevue 98008 Agency: Public	The two strategies that have been discussed the most have to do with more lanes of cement or with heavy public transit, both of which seem very expensive and both of which seem to involve a lot of physical changes. I would like to raise the possibility that there may be simpler, cheaper solutions, perhaps more in keeping with our private enterprise tradition. Right now the typical vehicle perhaps has just over one rider average, maybe 1.1 or 1.2 riders. Many of them only have one rider. A few have more. Imagine what would happen if we could get toward two riders per car. How many lanes of traffic would that replace or ease up? So how would you do that? In Singapore 20 years ago when I was there, they encouraged people to stop at bus stops and to pick up riders. So there were people -- and they encouraged that partly by having a congestion fee to people that didn't have riders. If you went to the bus stop, very quickly somebody would come by and pick you up looking for extra riders. Well, we have bus stops all over near our homes. It's easy to walk there. It's difficult to reach a carpool now because this day you have to have that doctor's appointment or that day I've got a sales call or something. I can't get locked into the same carpool day after day for weeks, months at a time. But suppose that each morning I could arrange a carpool as I wanted for that day. If I went somewhere else the next day, different. Suppose that as a driver when you do this, I registered, received some cards like buses have as to the general destination I was going to and a sign up sheet for passengers to sign. I go by the bus stop. People can join me, one, two, three. Then I go on my way with them. Perhaps I also give them some type of receipt. Later on, it would be possible to reward the people who picked up people. Also reward the people who took rides. I can imagine we could do this -- a lot of this much cheaper than you could do the heavier alternatives. I think there would be a lot of details to work out, security and so forth. But I would encourage us to think smaller.	This concept was not considered for the corridor. "Casual carpooling" or "slugging" occurs on the San Francisco Bay Bridge under their congestion pricing demonstration project and in Washington, D.C. Future TDM programs may consider this concept for the study area and regionally.
T80	O	1	Jim Hutchinson Agency: Bellevue Chamber of Commerce	They like the process that is going on. They are encouraging you to continue with the process that is going on.	Thank you for your comment.

Code Number			Name	Comment	Response
T80	SOL	1	Jim Hutchinson Agency: Bellevue Chamber of Commerce	I would like to point out that bus rapid transit system hundred percent increase in transit services, HOV conductivity, these are all very important aspects to any transportation system we provide. They're also included in the alternatives listed over there in the right-hand corner of this room. The process has worked.	Thank you for your comments regarding bus rapid transit.
T80	SOL	2	Jim Hutchinson Agency: Bellevue Chamber of Commerce	Most people that have come before you today and have asked for Alternative 5 have brought up many, if not all the aspects that are brought up in the 4 alternatives that 405 committee has been talking about from day one.	There is no Alternative 5 in the I-405 Corridor Program Draft EIS. Like the Sensible Solutions proposal, the Preferred Alternative provides for strategic freeway and arterial improvements, an aggressive transportation demand management and trip reduction program, substantial expansion of bus transit service including a new bus rapid transit system, and increased emphasis for transit-oriented development. For a full description of the alternatives, including the Preferred Alternative and why it was advanced, please see Chapter 2 of the Final EIS. Also, please refer to the response to comment E66.SOL-1.
T80	O	2	Jim Hutchinson Agency: Bellevue Chamber of Commerce	You have allowed for great public comment. It's unprecedented, the way you've done that and we hope you will continue the course what you started two years and continue to listen, but at the same time, don't let it impede your decision as you move forward. Thank you.	Thank you for your comment.