



May 9, 2006

Ms. Allison Ray, Environmental Manager  
Washington State Department of Transportation, I-405 Project Team  
600 108<sup>th</sup> Avenue NE, Suite 405  
Bellevue, Washington 98004

Re: I-405 Renton to Bellevue Project (SR 169 to I-90) Environmental Assessment

Dear Ms. Ray:

The I-405 Renton to Bellevue Project (SR 169 to I-90) Environmental Assessment (EA) evaluates a Build Alternative that proposes to add two new general purpose lanes in each direction on I-405 from SR 169 to I-90; realign this section of I-405 to bring it up to current freeway standards; construct a new in-line bus rapid transit station at 112<sup>th</sup> Avenue SE; construct a high-occupancy vehicle direct-access ramp at North 8<sup>th</sup> Street; realign and reconfigure eight interchanges; improve stormwater treatment and discharge; and make improvements to local roadways.

The Build Alternative's improvements and mitigation measures outlined in the EA are consistent with the City's interests in supporting its growing downtown and protecting neighborhood interests. Based on the City of Bellevue's review of the EA, it appears that WSDOT was successful in designing a project that will improve mobility in the region while responding to safety, noise and environmental issues. It also commits WSDOT to minimize the project impact on and acquisition of business and residential properties. The contents of this letter reflect the City's understanding of and input to WSDOT on the transportation, neighborhood and business, and noise findings outlined in the I-405 Renton to Bellevue Project (SR 169 to I-90).

Overall, the City is supportive of this project because it pursues the Bellevue to Renton segment of the I-405 Master Plan. However, the City is concerned that the effects of the project, as currently defined, will negatively impact neighborhoods and natural areas. In particular, the noise and visual aspects of the current proposal are issues. The City, therefore, wishes to work closely with WSDOT to refine the design for the corridor to minimize impacts and maintain the transportation value of the project. Further, we believe that WSDOT should revise its noise policies to better account for real world conditions that contribute to noise pollution.

### **Transportation**

Based on the City's review of the I-405 Renton to Bellevue Project (SR 169 to I-90) Environmental Assessment, the projects associated with this program improve access, speed, and reliability of the I-405 corridor for the traveling public using a balanced, multi-modal approach. Additionally, as outlined in *Appendix G: Transportation Discipline Report*, the project improves Bellevue arterial operations as measured by LOS intersection performance.

Currently, when the I-405 mainline is congested, unstable traffic flow occurs. This unstable traffic flow sometimes causes vehicles to back up on the on-ramps and interfere with surface street operations.

With the No Build Alternative, the delay at intersections would generally worsen from existing

conditions. If the project is not built, the flow of traffic will become so constrained that the delays would force drivers wishing to travel on I-405 to seek alternative routes on the limited number of local and regional roadways, leading to increased cut-through traffic causing additional congestion on those routes, or forego their trips entirely. This alternative is unacceptable to the City because it would overwhelm the already strained local transportation system and could curtail the City's economic growth.

In the Build Alternative, traffic volumes will generally increase due to the added capacity on I-405, but the levels of service will generally improve due to the added capacity at the interchanges. As reflected in the following examples, the freeway mainline congestion is less likely to back up into the interchanges with the Build Alternative.

- **112th Avenue SE/Lake Washington Boulevard.** This interchange will improve from LOS E conditions to LOS D or better. These improvements will result because three of the intersections will be signalized. The improved flow on the I-405 mainline will also allow vehicles to more efficiently enter the freeway.
- **120th Avenue SE and 118th Avenue SE.** This intersection will improve from LOS F to A in the 2014 PM peak hour, and from LOS F to LOS B in the 2030 PM peak hour. These improvements result from signalizing the intersection and increasing capacity at the Coal Creek Parkway interchange.
- **Coal Creek Parkway and the I-405 southbound ramps.** This intersection will improve from LOS F to LOS D during the 2014 PM peak hour due to the increase in capacity at the Coal Creek interchange.
- **Coal Creek Parkway and the I-405 northbound ramps.** This intersection will improve from LOS E to LOS B in the 2030 PM peak hour due to the increased capacity at the Coal Creek interchange.
- **Coal Creek Parkway and 121st Avenue SE.** This intersection will improve from LOS F to LOS C in the 2030 AM peak hour due to the increased capacity of the Coal Creek interchange.

The City is supportive of the project and generally agrees with these findings; however, the City will want to work with WSDOT to further evaluate these findings and seek to optimize local street operations as design progresses. We look forward to working cooperatively with WSDOT to ensure the maximum benefit from the project to the highway and to City streets.

### **Neighborhoods and Businesses**

Based on the City's review of the I-405 Renton to Bellevue Project (SR 169 to I-90) Environmental Assessment, the project reflects a commitment to minimize the project's impacts on business and residential properties. As outlined in *Appendix N: Social Elements Discipline Report*, at this stage of project design, WSDOT estimates that it will have to acquire 51 properties in Bellevue. Of the affected parcels, 47 are residential (15 partial and 32 full acquisitions) and 4 are commercial (2 partial and 2 full acquisitions).

It is the City's understanding that the environmental assessment reflects a worst "reasonable" case scenario in terms of the number of affected parcels. Sensitivity to neighborhood impacts

should remain of paramount concern to WSDOT as it progresses through design. We realize that the project seeks to strike a balance between impacts and optimal roadway design. However, every opportunity should be seized to minimize the right-of-way requirements associated with the project.

Additionally, the City expects WSDOT to honor its commitment to Context Sensitive Solutions (CSS) and incorporate visual and community-oriented features into the project design. The I-405 Bellevue Advisory Committee – comprised of Bellevue business community, neighborhood groups, Transportation Commission, and City staff – identified aesthetic design treatments that will help WSDOT improve appearance and compatibility of I-405 with surrounding communities.

Finally, WSDOT is committed to complying with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 which requires that “within a reasonable period of time prior to displacement, comparable replacement dwellings will be available to displaced persons.” If, at the time of acquisition of real property and/or real property rights, WSDOT determines that insufficient comparable relocation housing exists in the vicinity for displaced residents or businesses, WSDOT will commit funds authorized for the project to provide suitable housing. This housing could be in the form of constructing, relocating, rehabilitating, purchasing, renting, or otherwise financing the acquisition of necessary housing in a manner feasible for displaced individuals.

### **Noise**

The I-405 Renton to Bellevue Project (SR 169 to I-90) Environmental Assessment articulates a commitment to minimize the project’s noise impacts. As outlined in *Appendix H: Noise Discipline Report*, for all locations that approached or exceeded the Federal Highway Administration (FHWA) criterion of 67 dBA, WSDOT evaluated the effectiveness of noise walls to reduce the noise. Noise walls will be constructed at locations where they were found to be feasible and reasonable and are supported by the majority of local residents.

Based on State and Federal regulatory guidance, WSDOT found it feasible and reasonable to implement the following noise abatement measures to eliminate the impacts of the Build Alternative in Bellevue:

- **Wall West 6.** A 14 foot tall noise wall will be located along the west right of way of I-405 to replace the existing wall that will be removed as part of the I-405 improvements between Coal Creek Parkway and I-90. The wall will begin in the vicinity of SE 41<sup>st</sup> Street and extend for approximately 1,490 feet north to the point where additional right of way acquisition will not be required. Noise levels in the vicinity of Wall West 6 were predicted to range between 62 and 75 dBA without a wall.
- **Wall East 11.** A 9 foot tall noise wall extending 1,380 feet north between SE 60<sup>th</sup> Street and Lake Washington Boulevard SE is recommended to address the 60 to 77 dBA noise levels anticipated at this location without a wall.
- **Wall East 16.** A 16 foot tall noise wall extending 1,000 feet north of the I-90 interchange is recommended to address the 69 to 71 dBA noise levels anticipated at this location without a wall.

The other noise mitigation treatments considered as part of the EA were determined

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unreasonable or infeasible because they were not anticipated to effectively reduce noise or provide a sufficient benefit for the expenditure of public funds.

Bellevue neighborhoods are sensitive to noise. As the City and State improve roads, noise impacts are often a central issue for neighborhoods, many of which are already heavily impacted by noise pollution. As a response, the City has incorporated abatement strategies into its projects to mitigate noise beyond that required by state and federal regulations, often at considerable cost. These strategies have included noise walls, quiet pavement, and other techniques intended to protect neighborhoods. These strategies are supported by policies contained in the City's Comprehensive Plan Environmental Element (policies EN-88 through EN-94).

We strongly encourage WSDOT to revisit its noise policies to better account for local conditions. Currently, State and Federal noise abatement criteria specifically dismiss common conditions such as rain that contribute substantially to noise levels. We believe this is a major shortcoming because prevailing conditions are often not taken into consideration when determining mitigation needs. The State should consider opportunities to move beyond current State and Federal noise abatement criteria and approach mitigation from a standpoint of neighborhood protection and enhancement. While noise pollution does dissipate with distance, many neighborhoods are impacted beyond just the parcels directly adjacent to the highway. We believe it is essential that WSDOT pursue more extensive mitigation as a means to improve the quality of life in neighborhoods. WSDOT should consider emerging technologies such as rubberized pavements and others when effective to reduce noise pollution and therefore as a means to improve its projects and address longstanding neighborhood concerns.

We look forward to working with WSDOT to refine the project design to further minimize right of way impacts and to reduce the visual impacts of the project. It is our understanding that opportunities exist to narrow the physical extent of the improvement in key areas. Minimizing corridor width and applying I-405 Context Sensitive Solution concepts will greatly increase the value and appeal of the project to the City and its neighborhoods.

In summary, the City of Bellevue regards the Renton to Bellevue Project as part of a comprehensive strategy to reduce traffic congestion and improve mobility along the state's second-busiest highway. To this end, the City looks forward to working with WSDOT to address the issues reflected above as it moves this project through design and into construction. The City anticipates a close working relationship to achieve the goals of the I-405 Master Plan and the City's mobility, environmental, and neighborhood protection objectives. We view the project as an opportunity to greatly improve regional travel and a means to remedy many of the existing impacts on the natural environment and neighborhoods. WSDOT should strive for a high quality project that balances the transportation investment with the unique needs and character of surrounding land uses.

Sincerely,



Grant Degginger  
Mayor

cc: Bellevue City Council

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