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## SCOPING COMMENTS ABOUT THE PROPOSED ROOSEVELT RAPID RIDE PROJECT

To the Seattle Department of Transportation and the Federal Transit Administration:

More than any other organization, the Eastlake Community Council has been engaged with the City of Seattle regarding the Roosevelt RapidRide proposals. We worked with the City Council on the 2013 legislation that originally funded this study, we have held many public meetings on the subject, and we have engaged in extensive correspondence with SDOT (found on the ECC web site at <http://eastlakeseattle.org/?page=corridor>).

ECC supports a format for Eastlake Avenue that makes buses more frequent, reliable, and swift; makes bicycling safer with protected lanes; does not widen the roadway (preserves or expands sidewalks); and continues and expands the current planted medians and center turn lanes, allowing left turns to all side streets.

We recognize that the combination of these steps is likely to sacrifice most or all of the on-street parking on Eastlake Avenue. But we cannot support the removal of this parking unless SDOT fully and fairly analyzes the impacts of the loss of this parking upon neighborhood residents and businesses, and unless the Mayor and City Council take steps to restore on-street and on-site parking elsewhere in Eastlake, thus helping to mitigate the expected loss of this parking on Eastlake Avenue that would result from the Roosevelt RapidRide proposals.

Impacts of this project are clearly significant; an EIS should be initiated now. The official documents offered in this scoping process offer a “preliminary schedule” with a “milestone” in January 2019 stated as the “Finding of No Significant Impacts Issued”. We believe this statement is conclusory and should be retracted. The purpose of the Environmental Assessment is to ascertain whether or not impacts will be significant and hence whether an environmental impact statement (EIS) will be required.

The Federal Transit Administration’s regulations on Environmental Impact and Related Procedures (23 CFR part 771) under the National Environmental Policy Act (NEPA) state that “An EA shall be prepared by the applicant in consultation with the Administration for each action that is not a CE [categorical exclusion] and does not clearly require the preparation of an EIS, or where the Administration believes an EA would assist in determining the need for an EIS.”

We believe it is very likely that the environmental assessment will find significant impacts and that an EIS will be required. Delaying the EIS in this way will delay the project. To move this project along, we urge the City to reissue the scoping notice and process as being for an Environmental Impact Statement, not for an Environmental Assessment.

Wider range of alternatives needed in the EA or EIS. We object to the scoping report’s statement that the only two alternatives to be examined in the environmental assessment will be the Locally Preferred Alternative and the No Build Alternative. Under the FTA/FHWA NEPA regulations, an environmental assessment can include more than two alternatives. We believe SDOT should accept scoping comments such as ours that suggest additional alternatives. An environmental impact statement is required to have a wide range of alternatives, a good reason for an EIS to be done for the Roosevelt RapidRide.

An alternative we particularly urge be included in the environmental assessment or EIS is to use the entire length of Eastlake Avenue to get downtown. The Locally Preferred Alternative’s route uses Fairview Avenue North, creating redundancy with the existing South Lake Union Streetcar, while also mirroring the buses in the “Mercer Mess”—reportedly the most congested area in the state, and getting worse every year. For most of the history of transit service between downtown and the Roosevelt area, streetcars and buses (including route 70) stayed on Eastlake Avenue to get downtown. It was only in the early 1990s that the route 70 was shifted to Fairview Avenue North, causing major reductions in its speed and reliability that continue to this day.

Mitigation of parking consequences needed in EA or EIS. The environmental analysis should identify possible mitigations of the project’s impacts. We particularly recommend the development and analysis of a mitigation package to increase public on-street and private on-site parking supply as a way to compensate for the severe reduction in on-street parking from the proposed elimination of all parking spaces on Eastlake Avenue. As currently proposed, the Roosevelt RapidRide project would eliminate just over one-third of the Eastlake neighborhood’s on-street parking spaces. The resulting excess of parking demand over supply will hamper safety, livability and commerce throughout Eastlake.

On-street parking is no frill or luxury. It’s central to neighborhood safety and livability; to business success; and to mobility for children, seniors, the disabled, everyone. Eastlake’s 5000 residents and 5000 employees are among Seattle’s highest users of transit and bicycles. But many own, rent, or share a car, and need to park on the street at times, or even regularly. All have visitors or customers who arrive by vehicle, and all receive deliveries and services by vehicle. Without on-street parking, our residents cannot go about their lives as they should, and our restaurants and other small businesses may suffer or fail.

The Mayor, City Council, and departments should exempt Eastlake as a special case from the drive to repeal on-site parking requirements in new buildings. Already as a result of these efforts, none of the townhouse, apartment or condo buildings now going up in Eastlake have enough on-site parking. The problem will become far worse if all parking on Eastlake Avenue is eliminated.

Do study the impacts throughout Eastlake of eliminating all on-street parking on Eastlake Avenue.

Eastlake residents and businesses already experience extreme demand for on-street parking spaces, and this imbalance of demand over supply will skyrocket with elimination of all or even most of the spaces on Eastlake Avenue. The City sells far more restricted parking zone (RPZ) permits than the available on-street spaces.

Unlike other neighborhoods in which on-street parking opportunities extend limitlessly into other neighborhoods, the Eastlake neighborhood's parking supply is inescapably bounded by Lake Union on the west, Interstate 5 on the East, the Ship Canal on the north, and the Fairview Avenue North bridge on the south. Unlike any other neighborhood, ours does not have frontiers beyond which parking demand can be satisfied.

The Eastlake neighborhood is a long, narrow corridor. East of Eastlake Avenue, the farthest part of the neighborhood is just two blocks away. West of Eastlake Avenue, the farthest part of the neighborhood is just three blocks away, and just one block away in the north, half. Eastlake Avenue is currently an important source of parking for many who live or work on the other streets; and those who park there now, and would lose their spaces to the project, will easily be within reach to compete for the parking spaces that remain elsewhere in the neighborhood.

Do parking studies of the entire Eastlake neighborhood. From the beginning of the Roosevelt RapidRide planning, the Eastlake Community Council has requested that SDOT analyze all of the Eastlake neighborhood's on-street parking supply and demand and thus the full consequences of removing parking from Eastlake Avenue. Unfortunately, SDOT has consistently failed to do so. The on-site parking utilization studies that SDOT has conducted in Eastlake have been limited to just a fraction of the available block faces—as if those seeking parking that is no longer on Eastlake Avenue will not go to the other block faces in search of a parking space.

ECC discovered just last week that SDOT has a contractor doing an on-street parking utilization study that is continuing to repeat this mistake of looking at only a fraction of the block faces in the neighborhood. This study should not have been done during the scoping period, but rather should have been shaped by the scoping comments. The parking study will need to be redone to respond to these scoping comments that reasonably request parking studies of the Eastlake neighborhood as a whole. Otherwise the environmental assessment will fail to accurately assess the negative consequences of the Roosevelt RapidRide project and will fail to show the need for mitigation of these consequences.

To avoid road damage, keep bus weights within state and federal standards, and adopt a higher standard of pavement. For decades, many Metro buses, including increasing numbers of the electric buses, have been so heavy (some of them even while empty of passengers) that they exceed normal vehicle weight limits and would not be allowed on the road without invoking federal and state waivers

that allow buses to be on the road, whatever their weight. The weight limits are there for a reason, because vehicles over that weight do unreasonably high damage to the pavement.

The Roosevelt RapidRide proposal presents as a cost saving that it would be using existing Metro buses. But to the extent that these buses are overweight, they will do expensive damage to City streets, as SDOT's own studies have documented that they already are doing. The result of the proposal to use existing buses to save Metro money will impose new costs on Seattle taxpayers. The environmental assessment should estimate the cost of the resulting road damage, and how much savings could be had if Metro were to purchase buses that are light enough in weight that they do not need to invoke the waiver that allows them to be at road-damaging weights.

The project proposal to replace just two inches of roadway asphalt with new asphalt would be a very short-sighted and cost-ineffective step. Road damage from these buses is already obvious. The environmental assessment should fully explore the engineering standard of roadway reconstruction that is needed to protect Seattle roadways from the ongoing damage from Metro's overweight buses.

Do not prohibit left turns onto Fuhrman Avenue E. from northbound Eastlake Avenue. The environmental assessment must fully analyze negative consequences and alleged benefits of SDOT's intention to prohibit left turns onto Fuhrman Avenue E. from northbound Eastlake Avenue. We are not convinced that this step would have much benefit to bus travel, but we know it would be of extreme inconvenience and economic harm to the businesses, non-profits, and residents on Fuhrman and Fairview avenues. Compared to Allison and Hamlin streets, Fuhrman has the least slope of these other ways to get between Fairview and Eastlake avenues, and in icy weather there is no alternative. Fuhrman is an important gateway to the Pocock rowing Center and the businesses on Fairview Avenue E. SDOT has been too quick to propose the prohibited left turn, and a full analysis is needed to see the true consequences.

As mitigation, protect and where possible expand the planted medians. The planted medians in the center of Eastlake Avenue stemmed from the Eastlake Neighborhood Plan (available on the City of Seattle website). An important mitigation for the negative consequences of the Roosevelt RapidRide project would be to install new planted medians where there is now bare pavement. Also, SDOT should rethink its current proposal to destroy most of the planted median that is between E. Allison St. and Harvard Avenue E. The EA should analyze this issue and explore the alternatives. A planning charrette should be held to explore ways to preserve most of this median and its large trees, while still accommodating the needs of the buses.

Do not place the E. Lynn Street northbound transit station south of Lynn Street. Although the current bus stop is just north of Lynn Street, SDOT's current plan is for the Lynn Street northbound transit station to be south of Lynn Street, a location that would cause unacceptable conflicts between the stopped buses and the northbound traffic that is turning right to go eastbound on Lynn Street. SDOT apparently made this choice because of the failure to address a commercial driveway that is just north of Lynn Street. However, a design solution would make it possible to move the driveway and thus allow the bus stop to remain where it now is. The EA should analyze this issue and explore the alternatives.

No night construction. Construction is slated to take from 12 to 18 months. In order to protect the health and comfort of residents in Eastlake and throughout the corridor, it is important that the project construction only be done in the daylight hours. SDOT and its contractors should commit beforehand not to apply for or use the Major Public Project Construction (MPPC) Variance that is allowed to some transportation projects under the Seattle Noise Ordinance.

Public comment deadline in scoping process should not be closed until the public access has been provided the *Corridor Concept Final Report*. So far, the scoping process is fatally flawed by the City's failure to provide public access to SDOT's September 2016 Roosevelt Downtown High Capacity Transit Study *Corridor Concept Final Report*. Although this central report is frequently referenced in the scoping materials, the City has failed to post it generally on its web site and it is not included in the scoping materials provided at the two physical sites (Central Public Library and University Branch Public Library), nor as a link on the scoping website at: <http://www.seattle.gov/transportation/projects-and-programs/programs/transit-program/rapid-ride/roosevelt-rapidride>. Nor is the Corridor Concept Final Report available to the public anywhere else, whether in print or by website.

Thank you for your consideration of the above scoping comments.

Sincerely,

*Ann E Prezyna*

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Eastlake Community Council

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