

# SR 99

## Aurora Avenue North

### Multimodal Corridor Project, North 145<sup>th</sup> Street to North 165<sup>th</sup> Street

Finding of No Significant Impact (FONSI)

August 2003



*United States Department of Transportation - Federal Highway Administration*

SR 99  
Aurora Avenue North Multimodal  
Corridor Project:  
North 145th Street to North 165th Street

City of Shoreline, King County, Washington

Finding of No Significant Impact

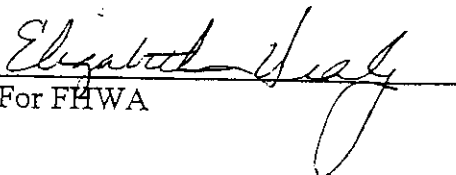
by the  
U.S. Department of Transportation  
Federal Highway Administration

The FHWA has determined, in accordance with 23 CFR 771.121, that the proposed project will have no significant impact on the human environment.

This Finding of No Significant Impact (FONSI) is based on the Environmental Assessment, SR99, Aurora Avenue North Multimodal Corridor Project: North 145<sup>th</sup> Street to North 165<sup>th</sup> Street, and other documents and attachments as itemized in this FONSI. These documents have been independently evaluated by the FHWA and determined to accurately discuss the project purpose, need, environmental issues, impacts of the proposed project, and appropriate mitigation measures. It provides sufficient evidence and analysis for determining that a NEPA EIS is not required.

FHWA takes full responsibility for the accuracy, scope, and content of the EA, as modified by this FONSI and the referenced attachments.

7/28/2003  
Date of Approval

  
For FHWA

## ADA Notice



Persons with disabilities may request this information be prepared and supplied in alternate formats by calling Ben Brown (collect) at (206) 440-4528 or the Washington ADA Accommodation Hotline (collect) at (206) 389-2839. Persons with hearing impairments may access Washington Telecommunications Relay Service (TTY) at 1 800-6388, or Tele-Braille at 1 (800) 8338-6385, or Voice at 1 (800) 833-6384, and ask to be connected to (360) 705-7097.

## Title VI Notice

The Washington State Department of Transportation, and the Federal Highway Administration assure full compliance with Title IV of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, and related statutes and regulations in all programs and activities. Title VI requires that no person in the United States of America shall, on the grounds of race, color, national origin, or sex be excluded from the participation in, be denied the benefits of, or be otherwise subject to discrimination under any program or activity.

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## ***Finding of No Significant Impact***

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### **Description of Proposed Action**

The Federal Highway Administration (FHWA) issued an Environmental Assessment (EA) on July 10, 2002 for the SR 99: Aurora Avenue North Multimodal Corridor Project: North 145th Street to North 165th Street (Aurora Corridor Project 145-165). It provides for improvements on SR 99 from North 145th Street to North 165th Street in the City of Shoreline, King County, Washington. Based on a range of input received, the project team reviewed the alternatives in the EA in order to determine if it was possible to modify the design to reduce impacts and concerns while still maintaining the intent and function of the alternatives. The Proposed Action, known as “Alternative A Modified” in the SEPA Final EIS, was developed through the process of reviewing and responding to Value Engineering (VE) proposals, responding to public comments on the three alternatives included in the EA, comments from WSDOT, and the “Citizens Advisory Task Force (CATF) 32 Points” which outline the City Council-adopted CATF recommendations for the development and implementation of the project.

Additional proposed improvements include constructing curbs and gutters on all sidewalks, planting street trees, and providing other pedestrian amenities. Continuous 7-foot-wide sidewalks would be constructed along both sides of Aurora Avenue North to provide pedestrian walkways that are safe and attractive; sidewalks would be narrowed where building conflicts exist. A 4-foot wide amenity zone would be constructed adjacent to the 6-inch curb, and would serve as a buffer between pedestrians and street traffic. Pedestrian railings would be provided as necessary to protect pedestrians at vertical grade separations, such as along retaining walls. North 160th Street would be closed to through-traffic on the east side of the intersection with Aurora Avenue North. The sidewalk and amenity zone would be continuous on the east side of Aurora Avenue North through this intersection.

Bus shelters would be built at specific transit stop locations, and illumination would be added throughout the corridor, both pedestrian scale lighting and consistent roadway lighting. In addition, overhead utilities would be relocated underground. The stormwater drainage system would include a new collection and conveyance system, improved water quality facilities to treat the roadway stormwater collected, and oil-water separators located at

high volume intersections including North 145th Street and North 155th Street. In addition, detention facilities would be incorporated in the project, improving stormwater detention for Aurora Avenue runoff.

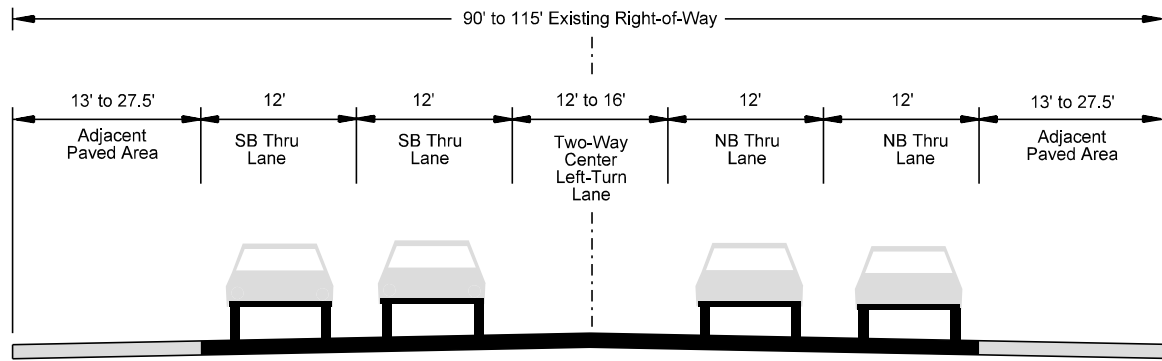
## **EA Coordination and Comments**

The Aurora Avenue North Multimodal Corridor Project: North 145th Street to North 165th Street Environmental Assessment and Draft Environmental Impact Statement was issued on July 10, 2002. Two notices ran in the Seattle Times, Shoreline Enterprise, and Korean Central Daily (in Korean) announcing the publication of the document, requesting comments on the document, and announcing the public hearing. The document was made available at multiple locations for purchase and was mailed directly to agencies with jurisdiction. The agencies and public had 38 calendar days from the issue of the EA/DEIS to the date that comments were requested (August 16, 2002). Over 64 letters containing nearly 1,000 comments were received. The letters and responses to the comments are contained in the Final EIS and are also attached to this document.

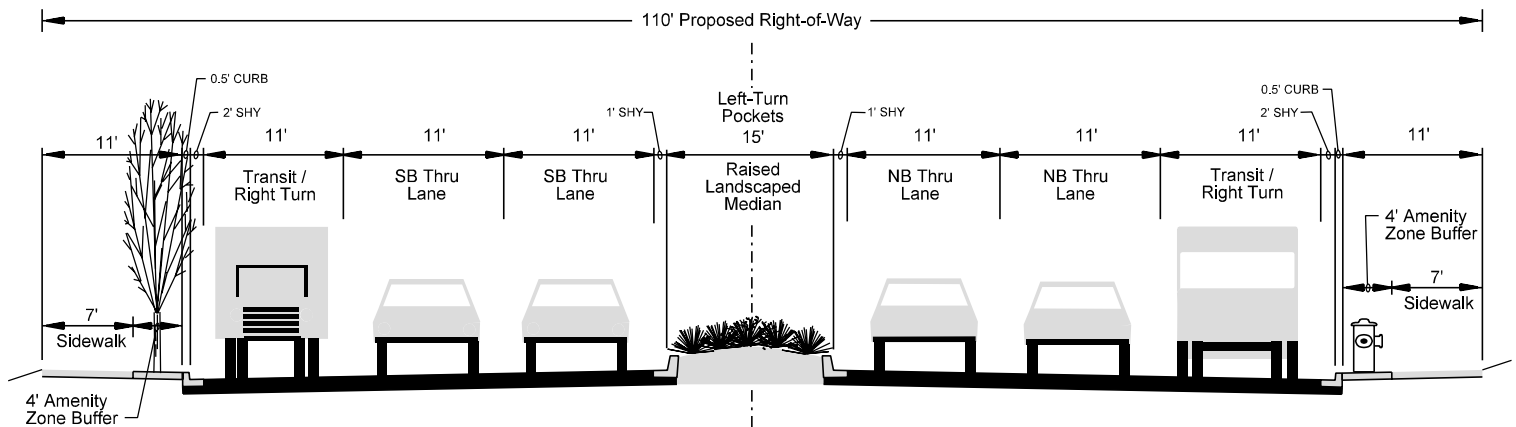
Comments could generally be placed into three categories – general project comments, project design comments, and comments regarding particular impacts or mitigation measures. General project comments included statements of support or opposition for certain alternatives, and questions and critiques of the project definition and the public involvement program. Project design comments requested changes in the number of signals, different sidewalk widths, more breaks in or removal of the center median, and more general-purpose vehicle capacity, among others. Comments were made on nearly all of the impacts reported in the EA/DEIS including business impacts, neighborhood impacts, and stormwater impacts. Some comments also requested additional mitigation measures such as additional signage during construction. Please see Attachment 5, which contains all of the comment letters and their responses.

## **Aurora Corridor Project Open House and Public Hearing**

On August 6, 2002 the Federal Highway Administration, Washington State Department Of Transportation, and City of Shoreline hosted an open house and public hearing for the Aurora Corridor Project 145-165 EA/DEIS. The purpose of the open house

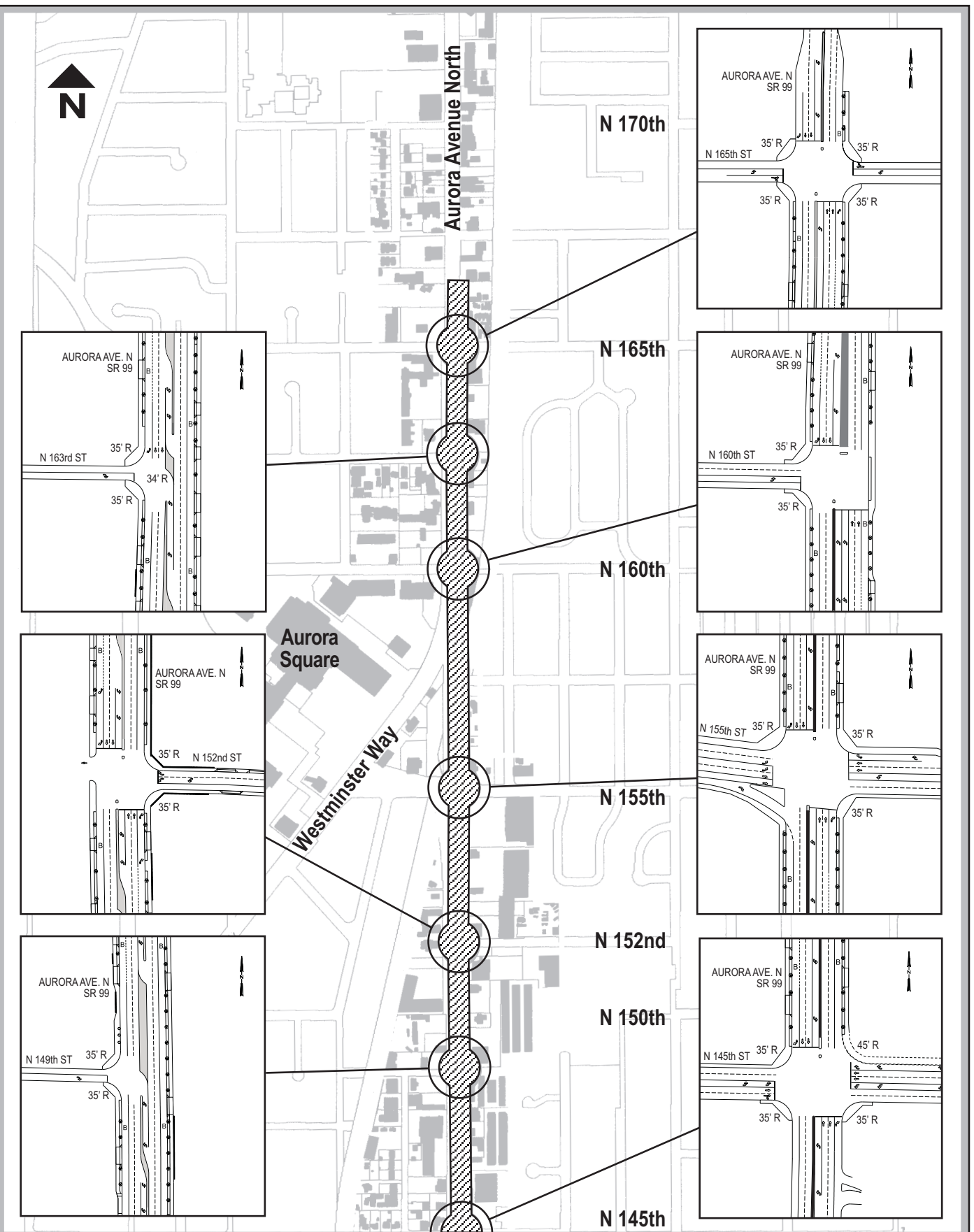


**No Action Alternative**  
**Typical Cross Section at Mid-Block**



**Alternative A-Modified**  
**Typical Cross Section at Mid-Block**





Aurora Avenue North Multimodal Corridor Project:  
North 145th Street to North 165th Street



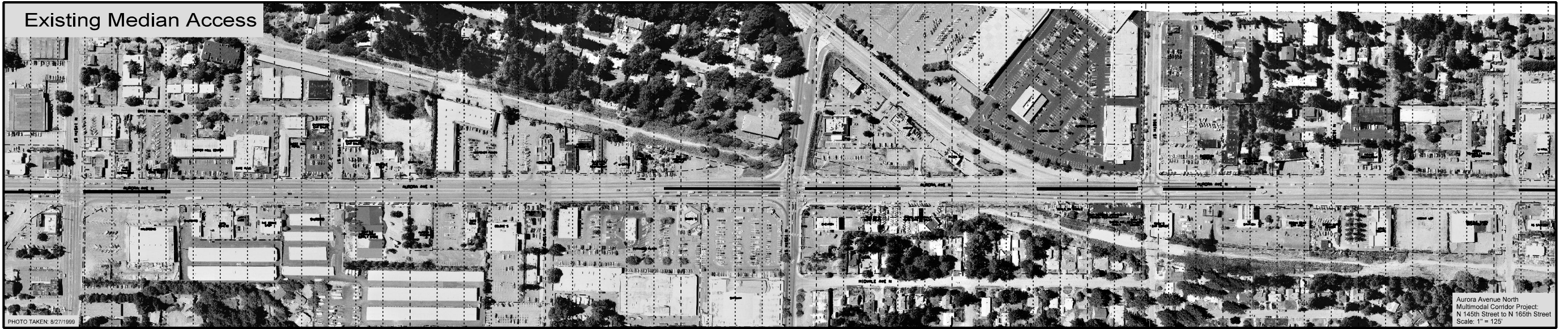
Project Area Limits



B Business Access/Transit Lane

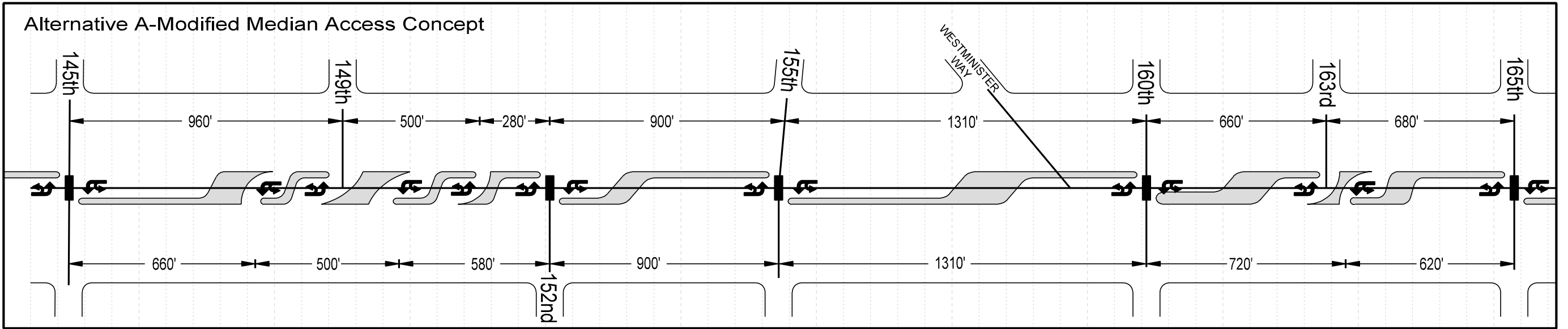
Figure 2  
**Alternative A  
Modified**

# Existing Median Access



Existing Median Length: 2,440'  
Percent of total: 38%

# Alternative A-Modified Median Access Concept



NB U-turns  
7 @ 750' Average

Alternative A:  
Proposed Median Length: 5650'  
Percent of total: 87%

Full 15' Width Median Length: 741'  
Percent of total: 13%

SB U-turns  
7 @ 750' Average

## Legend

- Location of Existing Median
- Location of Traffic Signal
- Location of Proposed Median
- Outside Edge of Roadway
- Traffic Curb
- Left and U-Turn Opportunities



Aurora Avenue North  
Multimodal Corridor Project:  
North 145th Street to North 165th Street

FIGURE 3  
Median Access Concepts

and hearing was to present information on the proposed alternatives and to obtain comments from all interested persons on the proposal and the impacts and mitigation measures. The EA/DEIS was available 28 days before the public hearing. During the open house, exhibits were displayed showing the alternatives and potential impacts. The public hearing featured over 40 different speakers representing a wide range of viewpoints during the course of the night. A Korean interpreter was present and used during the hearing. The meeting was recorded and verbatim transcripts have been prepared and included in Attachment 5.

## **Determinations and Findings**

### **National Environmental Policy Act (NEPA) Finding**

FHWA served as the lead agency under NEPA for the project. The City of Shoreline, assisted by WSDOT, prepared an Environmental Assessment (EA) in compliance with NEPA, 42 U.S.C. Section 4321 et. seq., and with FHWA's regulations, 23 CFR Part 771. The EA discusses the potential impacts of the project so that FHWA can determine whether significant adverse impacts (CEQ 1508.27) are probable. If such a determination were made, a NEPA Environmental Impact Statement would need to be prepared. The City of Shoreline has incorporated environmental considerations into its study of project alternatives and has conducted evaluations of the project's potential environmental impacts. FHWA, WSDOT, and the City have reviewed a preliminary version of the EA. The EA was issued on July 10, 2002 as a part of a combined NEPA EA/SEPA DEIS document. The EA found that the project's construction and operation would cause no significant adverse environmental effects that would not be mitigated. This finding applies to all applicable environmental elements, including Land Use, Transportation, Social Impacts, Economics, Wildlife, Fisheries and Vegetation, Water Quality/Surface Water, Noise, Air Quality, Historic and Archaeological Resources, Visual Quality, and Hazardous Materials.

After carefully considering the EA, its supporting documents, and the public comments and responses, FHWA finds under 23 CFR 771.121 that the proposed project, with the mitigation to which the City of Shoreline has committed, will have no significant adverse impacts on the environment. The record provides sufficient evidence and analysis for determining that a NEPA EIS is not required.

## **Section 106 Compliance**

Section 106 of the National Historic Preservation Act of 1966, as amended, requires the review of federally assisted projects for impacts to districts, sites, buildings, structures, and objects listed in, or eligible for inclusion in, the National Register of Historic Places. Federal agencies must coordinate with the State Historic Preservation Officer (SHPO) and potentially affected Tribes to make this determination. The Advisory Council on Historic Preservation (ACHP) has established procedures for the protection of historic and cultural properties in, or eligible for, the National Register (36 CFT Part 800).

Archival review, tribal consultation, and field surveys identified no evidence of archaeological resources within the project site. Review of past studies in the area and applicable maps, ethnographies, histories and archaeological documents did not uncover any National Register-listed or -eligible cultural resources within the project area. As part of early coordination with the Tribes in preparation of the cultural resources assessment, contacts were made with the Tulalip and Suquamish Tribes. Neither tribe expressed any concerns about cultural resources.

In addition to consultation with potentially affected Tribes, coordination and consultation with the Washington State Office of Archaeology and Historic Preservation (OAHP) under Section 106 of the National Historic Preservation Act were initiated. A letter was sent to SHPO from WSDOT that included a finding of "no effect" to historic and cultural resources as a result of the proposed project. This letter requested concurrence from SHPO, which was received in October 2001. Based on the cultural resources analysis and coordination with the Tribes and SHPO, FHWA finds that the project will have no effect on any identified or likely cultural or historic resources, and that the Section 106 coordination requirements for this project have been fulfilled.

## **Section 4(f) Findings**

Section 4(f) of the Department of Transportation Act of 1966, codified at 49 U.S.C. 303, declares a national policy that a special effort should be made to preserve the natural beauty of the countryside, public park and recreational lands, wildlife and waterfowl refuges, and historic sites. The Secretary of Transportation may not approve transportation projects that require the use of land from a significant publicly owned park, recreation



area, wildlife or waterfowl refuge, or any significant historic sites unless a determination is made that (i) there is no feasible and prudent alternative to the use of the land; and (ii) the action includes all possible planning to minimize harm to the property resulting from such use (23 CFR 771.135).

The existence of potential impacts to Section 4(f) resources was evaluated as part of the EA. The closest Section 4(f) resource to the project area is the proposed Interurban Trail, planned to extend from North 145th Street to North 205th Street mostly using Seattle City Light utility right-of-way. The Interurban Trail is a “licensed use” in the utility transmission right-of-way agreed to in a Memorandum of Understanding (MOU). The MOU between the City and Seattle City Light was effective on August 9, 2001.

The proposed trail would cross Aurora Avenue North at North 155th Street. This at-grade crossing might need to be closed or relocated for a short time during paving and other construction activities. If it were closed, a detour would be provided. One option may be that trail users could use the existing transportation system to continue northward. The City will maintain a crossing for the trail so that its use is not precluded.

There would be no acquisition of land from the future Interurban Trail for this project nor would this project cause any substantial impairment to the operation of the future Interurban Trail. The proposed action would not preclude the use of, nor acquire land from, any proposed or existing recreational facility that qualifies as a Section 4(f) property. FHWA finds that the proposed project will not use or significantly impact any park or recreational resources protected by Section 4(f) of the USDOT Act of 1966.

## **Endangered Species Act Findings**

The Endangered Species Act of 1973 (ESA), as amended, is intended to protect threatened and endangered species and the ecosystems on which they depend. The ESA requires a federal agency to ensure that any action it authorizes, funds, or carries out is not likely to jeopardize the continued existence of any listed species or result in direct mortality or destruction or adverse modification of critical habitat of listed species. This requirement is fulfilled under Section 7 of the ESA by review of the proposed actions and consultation with the appropriate agency responsible for the conservation of the affected species. If necessary, mitigation will be required to avoid jeopardizing listed species or their habitat. NOAA Fisheries and the U.S. Fish and Wildlife

Service (USFWS), the agencies responsible for administering the ESA, were contacted early in the project.

According to information provided by NOAA Fisheries, the project would occur near the potential presence of Puget Sound Chinook salmon, Coho salmon, Humpback whales, Leatherback turtles, and Stellar sea lions. Correspondence received from USFWS reported no threatened or endangered species under their jurisdiction within the project area. A site-specific reconnaissance-level survey was conducted for fish and wildlife resources by CH2M HILL biologists and prior research was evaluated to determine whether any species were present. Due to the location of the project area relative to Boeing and Thornton Creek, the type of work proposed, the likely timing of construction work, and documented lack of use of the project area by listed species, the potential for impact to listed species is extremely remote. For those reasons, the project was deemed by CH2M HILL staff to have no effect on the listed species. A Letter of No Effect was prepared and submitted to WSDOT on November 25, 2002. On December 11, 2002 WSDOT biologists concurred with the findings and forwarded the letter to NOAA Fisheries, USFWS, and FHWA for their files.

### **Magnuson-Stevens Act Finding**

The project will not adversely affect Essential Fish Habitat (EFH) as designated by the Magnuson-Stevens Fishery Conservation and Management Act (MSA). The proposed project action area does not include habitat that has been designated as EFH for various life stages of Chinook and Coho salmon (the primary fisheries of concern) or any other fishery protected under MSA. Conservation recommendations pursuant to MSA (§305(b)(4)(a)) are not necessary.

### **Conformity with Air Quality Plans**

The Federal Clean Air Act (CAA) requires states to take actions to reduce air pollution in nonattainment areas to the extent that federal health-based standards are not exceeded, and to provide control measures in maintenance areas to assure attainment for at least ten years. The framework for meeting these goals is the State Implementation Plan (SIP). As required by the CAA, the State Department of Ecology and the Puget Sound Clean Air Agency (PSCAA), submitted both ozone and carbon monoxide (CO) SIPs to EPA for review, and the plans were approved. Under Section

176 of the CAA (adopted by chapter 70.94 RCW of the Washington State Clean Air Act), the Puget Sound Regional Council (PSRC), as the responsible metropolitan planning organization, may not adopt, approve, or accept any transportation improvement projects that do not conform to the Washington SIPs. Conformity with a SIP is defined as complying with the plan's purpose of reducing or eliminating the severity and number of violations of an ambient air quality standard and achieving expeditious attainment of such standards. The federal and state rules and regulations governing conformity are described in 40 CFR parts 51 and 93 and in WAC 174-420. The City of Shoreline consulted PSRC regarding conformance of the proposed Aurora Corridor Project 145-165 with existing transportation and air pollution control plans. The PSRC confirmed that the proposed project is located in the Puget Sound region's air quality maintenance area for CO and ozone. The proposed project is included in the current Metropolitan Transportation Plan and Transportation Improvement Program (TIP). Both of these plans have been found to meet the conformity tests as identified by federal and state conformity regulations. A site-specific air quality analysis that includes dispersion modeling may constitute a "project-level conformity review" as defined in clean air rules. For the Aurora Corridor Project 145-165, such modeling analysis was part of the project level review. The analysis and conclusions are summarized in the following two paragraphs.

The intersections of North 145th Street/Aurora Avenue North, North 155th Street/Aurora Avenue North, and North 160th Street/Aurora Avenue North were modeled for CO impacts under the 2000 existing conditions and for the future years of 2004 and 2020 both with and without the project. The same modeling assumptions and methodology were used for the base year so that the results could be compared to those predicted for the opening year 2004 and the design year 2020. Worst-case 1-hour and 8-hour CO impacts for 2004 and 2020 with and without the project were predicted at the selected intersections.

The maximum worst-case predicted 2004 and 2020 eight-hour CO concentrations with the project was 11.0 parts per million (ppm) (at North 145th Street in 2004). The concentration at North 145th Street would exceed the standard of 9.0 ppm, however the existing concentration is 11.2 ppm and the concentration would fall to 10.5 ppm in 2020. Additionally, the concentration levels without the project are the same as with the project at North 145th Street. The maximum worst-case predicted 2004 and 2020 proposed action one-hour CO concentration is 15.7 ppm (at North 145th Street in

2004), which does not exceed the standard of 35.0 ppm and is lower than the existing 2000 levels. Consequently, the model results indicate that the project would neither increase the frequency nor severity of any existing violation of the CO standard, nor create a new violation of CO standards. At both the regional and "project" level, the project therefore conforms to the SIP and meets all requirements of the state and federal clean air acts.

## **Farmland Findings**

Neither suitable soils nor active farming occur on lands that would be utilized for construction and improvements in regard to the proposed project. There would be no adverse impacts to agriculture lands caused by the project. The project would be consistent with the Farmlands Protection Policy Act (FPPA) of 1981 (7 USC 4201-4209) and other applicable state and federal farmlands protection policies, orders, and guidance.

## **Environmental Justice Findings**

Executive Order 12898 provides that "each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minorities and low-income populations." The Department of Transportation's Order to Address Environmental Justice in Minority Populations and Low-Income Populations similarly requires FHWA to explicitly consider human health and environmental effects related to transit projects that may have a disproportionately high and adverse effect on minority and low-income populations. It also requires them to implement procedures to provide "meaningful opportunities for public involvement" by members of these populations during project planning and development (DOT Order No. 5680.1). The EA includes an environmental justice analysis in accordance with the Executive, the Department of Transportation, and FHWA Orders. It assesses whether the project would result in disproportionately high and adverse effects on minority or low-income populations, taking into account project effects and benefits. This analysis demonstrated that the construction and operation of the Aurora Corridor Project 145-165 would not result in disproportionately high and adverse effects on minority or low-income populations. The City produced Korean language translations of fliers to assist Korean business community

members with their understanding of the project and the issues discussed at the meetings. A Korean translator also attended the block meeting where most Korean businesses are located. Furthermore, project-related notices were printed in Korean in a local Korean newspaper and a Korean interpreter was available at the environmental public hearing. Based on this analysis, FHWA finds that the construction and operation of the Aurora Corridor Project 145-165 would not have disproportionately high and adverse effects on low-income or minority populations.

### **Floodplain Findings**

Pursuant to Executive Order 11988 (Floodplain Management), the City of Shoreline assessed floodplains within the 100-year floodplains and floodways defined by the Federal Emergency Agency (FEMA) and locations with reported flooding problems or within locally managed floodplains. The EA assessed floodplains in accordance with the Executive Order and concluded that the project would not result in adverse impacts to floodplains because no mapped FEMA floodplains are located within the project area. FHWA finds that no adverse impacts to any 100-year floodplains or floodways would occur as a result of the proposed project.

### **Wetlands Findings**

The United States Department of Transportation seeks to assure the protection, preservation, and enhancement of the nation's wetlands to the fullest extent practicable during the planning, construction, and operation of transportation facilities and projects (DOT Order 5660.1A). This is consistent with Executive Order 11990, requiring that new construction located in wetlands be avoided unless there is no practicable alternative to the construction and that the proposed action include all practicable measures to minimize harm to wetlands that may result from such construction. No wetlands were identified within the project area using methods of the Washington State Wetlands Identification and Delineation Manual (Ecology, 1997), a manual consistent with the Corps of Engineers Wetland Delineation Manual (Environmental Laboratory, 1987).

### **Area of Concern**

The project remains controversial with some citizens of the City of Shoreline. Disrupted access for customers and deliveries, loss of frontage, signage, visibility, and additional congestion are

concerns of the business community. Representatives of nearby neighborhoods have expressed concern over cut-through traffic and its effect on neighborhood safety. The potential effects of the project on Boeing and Thornton Creeks have also been raised as concerns from the public. Additionally, some members of the public continue to request the following additions to the design alternatives:

- 7-lane cross section with a two-way left-turn lane and no median
- A 5-lane cross section with a two-way left-turn lane if a median is required for 7 lanes
- General purpose lanes instead of BAT lanes

The WSDOT has given a written response to these design alternatives, citing reasons for their inadequacy. Other topics of controversy mentioned above have been studied within the SEPA Final EIS issued by the City of Shoreline.

### **Incorporations by Reference**

The Environmental Assessment (EA/DEIS issued July 10, 2002) is incorporated by reference into this FONSI. To disclose text changes from the EA as a result of public and agency comments, all chapters except for chapter 3, of the SEPA Final EIS produced by the City of Shoreline are also incorporated by reference. Copies of these documents are available upon request from Ben Brown, Documentation Program Manager, WSDOT-MS 138, PO Box 330310, Seattle, WA 98133-9710 [telephone 206-440-4528]. Disclosure and discussion of the impacts and mitigation for the proposed action (Alternative A Modified) are included in Attachments 3 and 4 below.

## **Attachments**

The following attachments are incorporated into this FONSI:

### **1 Notice of Availability of FONSI**

- A. Notice Text
- B. Newspaper Listing for Notice

### **2 FONSI Distribution List**

### **3 Impacts of the Proposed Action (Alternative A Modified)**

### **4 Mitigation Commitment List**

## **5 Public Hearing and Written Comments with Responses**

## **6 Errata to Environmental Assessment**



ATTACHMENT 1

# **Notice of Availability of FONSI and Notice of Adoption of EA Under SEPA**

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## NOTICE OF AVAILABILITY OF THE FINDING OF NO SIGNIFICANT IMPACT

**Purpose of Notice:** This notice is published to notify interested citizens and others that the Federal Highway Administration (FHWA) has issued a determination of Finding of No Significant Impact (FONSI) on August 6 2003. This finding is based upon the evaluation of the Environmental Assessment (EA) as issued on July 10, 2002, and public and agency input at the public hearing on August 6, 2002, for the SR 99 Aurora Avenue North Multimodal Corridor Project: North 145th Street to North 165th Street.

**Description of Proposed Project:** This project would modify the existing state route by constructing 7-foot sidewalks with an adjacent 4-foot wide amenity zone and six-inch curb that extends the length of the project area, adding a business access/transit lane in each direction, and installing a center median with left- and u-turn pockets. New signals would be installed at North 152nd Street and North 165th Street. Aside from signalized intersections, left-turns and u-turns would be provided for in three additional southbound locations and three additional northbound locations. Additional improvements include constructing curbs and gutters on all sidewalks, planting street trees and vegetation, and providing other pedestrian amenities; sidewalks would be narrowed where building conflicts exist. Overhead distribution utility lines would be relocated underground. Stormwater facilities would also be constructed.

Copies of the FONSI are available locally from Kirk McKinley, Project Manager, 17544 Midvale Avenue North, Shoreline, WA 98133.

The FONSI will also be available for review at the both Shoreline Public Libraries (2402 NW 195<sup>th</sup> Place and 302 NW 175<sup>th</sup> Street) and the WSDOT Northwest Region Office [15700 Dayton Avenue North (MS 138), Seattle].

Persons with disabilities may request this information be prepared and supplied in alternate formats by calling Ben Brown (collect) at (206) 440-4528 or the Washington State Department of Transportation ADA Accommodation Hotline collect at 206-389-2839. Persons with hearing impairments may access Washington State Telecommunications Relay Service (TTY) at 1-800-833-6388, or Tele-Braille at 1-800-833-6385, or Voice at 1-800-833-6384, and ask to be connected to (360) 705-7097.

The FHWA and the WSDOT assure full compliance with Title VI of the Civil Rights Act of 1964 by prohibiting discrimination based on race, color, national origin and sex in the provision of benefits and services.

Printed on August 6, 2003 and August 13, 2003.



## **Newspaper Listing for Notice of Availability for FONSI**

The Notice of Availability of the FONSI was advertised in the following newspapers on the dates noted:

Seattle Post-Intelligencer (legal), August 6, 2003 and August 13, 2003

Shoreline Enterprise (display), August 8, 2003 and August 15, 2003

Korean Central Daily (display), August 6, 2003 and August 13, 2003

ATTACHMENT 2

## **FONSI Distribution List**

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To foster good lines of communication, enhance interagency coordination, acknowledge that this FONSI is a public document, and involve the public and Tribes in implementing NEPA procedures, the FONSI is sent to the entities below.

**Federal**

U.S. Department of Commerce, National Marine Fisheries Service  
Department of the Interior, U.S. Fish and Wildlife  
Seattle District, U.S. Army Corps of Engineers  
U.S. Environmental Protection Agency  
U.S. Department of the Interior, Bureau of Indian Affairs  
Federal Transit Administration

**Tribes**

Tulalip Tribes  
Suquamish Tribes

**State**

Department of Community Trade and Economic Development, OAH  
Department of Ecology  
Department of Fisheries and Wildlife  
Office of Community Development  
Department of Natural Resources  
Governor's Office of Indian Affairs  
Department of Social and Health Services  
Puget Sound Water Quality Action Team  
Washington State Patrol  
Washington Parks and Recreation Commission

**Regional**

Economic Development Council of Seattle and King County  
Puget Sound Regional Council  
Puget Sound Clean Air Agency  
Northwest Indians Fisheries Commission

**Transit Agencies**

King County/Metro, Environmental Planning and Real Estate  
Community Transit (Snohomish County)  
Sound Transit

## **Local and County**

King County Department of Development and Environmental Services  
King County Wastewater Treatment Division  
King County Cultural Resources Division  
Snohomish County Planning Department  
King County Fire District #44  
King County Landmarks  
City of Seattle, Department of Construction and Land Use  
Seattle Public Utilities – Water Division  
Seattle City Light  
City of Edmonds  
City of Lake Forest Park  
City of Lynnwood  
City of Mountlake Terrace  
Town of Woodway  
Shoreline Water District  
Shoreline Historical Museum  
Shoreline School District

## **Libraries**

Bellevue Library  
Shoreline Library  
Richmond Beach Library

## **Media**

*Seattle Post-Intelligencer*  
*Shoreline Enterprise*  
*Korean Central Daily News*

## **Public and Corporations**

Qwest Communications  
Ronald Wastewater Management  
Rabanco  
Waste Management Northwest  
Verizon Communications  
AT&T Broadband and Internet Services  
Puget Sound Energy  
Shoreline Merchants Association (2)

ATTACHMENT 3

## **Impacts of the Proposed Action**

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## **ATTACHMENT 3      Impacts of the Proposed Action**

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### **Selection of Proposed Action**

The Federal Highway Administration (FHWA) issued an Environmental Assessment (EA) on July 10, 2002 for the SR 99: Aurora Avenue North Multimodal Corridor Project: North 145th Street to North 165th Street (Aurora Corridor Project 145-165). Based on a range of input received from the public, the project team reviewed the alternatives in the EA to determine if it was possible to modify the design to reduce impacts and concerns while still maintaining the intent and function of the alternatives. The proposed action, known as “Alternative A Modified” in this FONSI, and in the SEPA Final EIS, was developed through the process of reviewing and responding to Value Engineering (VE) proposals, responding to public comments on the three alternatives included in the EA, comments from WSDOT, and the “CATF 32 Points.” On December 9, 2002, the Shoreline City Council voted on a proposed action - Alternative A Modified - based on the findings of the environmental documents.

### **Transportation**

#### **Construction Impacts**

Impacts due to construction under the proposed action would potentially result from lane closures, detours, and temporary disruption of traffic patterns. Revisions to business access typically create temporary disruption of access to businesses because drivers are unfamiliar with the new access conditions. These disruptions to access would tend to be most severe during initial construction, and the effects would decrease over time. Truck and delivery access would also be impacted during construction. At stages of construction when traffic flow is affected by lane reductions and construction activities, some traffic diversion to adjacent streets may occur. Some longer distance trips may be diverted to I-5, 15th Avenue, Meridian Avenue, and Dayton Avenue. Some shorter distance trips may divert to nearby residential streets.

#### **Operational Impacts**

Operational impacts are discussed in terms of street system, traffic volumes, LOS, crashes and safety, pedestrian safety, and transit.

#### **Level of Service**

The City, per its Comprehensive Plan (City of Shoreline, 1998), uses a zonal average LOS measure to determine acceptable intersection operations. For Aurora Avenue North, this is represented as a zonal average of LOS E. Using this methodology, LOS for intersections along Aurora Avenue North must average LOS E or better to comply with the *City of Shoreline Comprehensive Plan* and its transportation concurrency goals.

### ***Operations Under Initial Conditions***

The effects of transitions from the new cross section, provided by the proposed action, to the existing cross section along Aurora Avenue North would be treated by the construction of lanes and lane tapers to accommodate the merge of transit and right-turning vehicles at the project termini south of North 145th Street and north of North 165th Street. The general-purpose traffic using the Business Access/Transit (BAT) lane would be required to turn right and exit Aurora Avenue North at driveways to properties and at the intersections. Therefore, the vehicles making the through movement in the BAT lane would be limited to transit vehicles and bus traffic, which can be given priority or special advance timing to facilitate the merge back into general-purpose traffic. This merge action would be of no greater impact than currently occurs in locations where transit vehicles pull onto the shoulder to unload and load passengers and then reenter the traffic lane. Vehicles using the BAT lane to make right turns onto Aurora Avenue North would have some distance in which to merge into the through traffic lane. The development of the new cross sections would not be expected to have any adverse traffic impacts on the highway system north or south of this project, nor any adverse impacts on other adjacent roadways.

### ***Operations Under 2020 Conditions***

The additional capacity provided by the proposed action would provide better operating conditions along Aurora Avenue North than would be without the project. Intersection delay within the project limits would average 53 seconds per intersection, or LOS D, which is within the range of acceptable zonal LOS required by the *City of Shoreline Comprehensive Plan*. Major benefits of the proposed action would be improved transit speed and reliability as well as the preservation of business access under congested conditions. Delays experienced at minor street approaches along the corridor would also be improved under the proposed action. Table 1 lists the future intersection LOS with and without the proposed action.

<b>Table 1</b> <b>2020 Estimated p.m. Peak Intersection Level of Service Summary</b>				
	<b>No Action</b>		<b>Proposed Action</b>	
<b>Cross Street</b>	<b>LOS</b>	<b>Vehicle Delay (seconds)</b>	<b>LOS</b>	<b>Vehicle Delay (seconds)</b>
North 145th Street	F	119	F	127
North 152nd Street	F <sup>1</sup>	>100	B	11
North 155th Street	F	96	E	79
North 160th Street	D	47	C	28
North 165th Street	F <sup>1</sup>	>100	B	20
<b>Corridor Average<sup>2</sup></b>	<b>F</b>	<b>87.3</b>	<b>D</b>	<b>53</b>

Source: CH2M HILL, 2002

<sup>1</sup>Unsignalized Intersection – LOS Average for Minor Approaches

<sup>2</sup>Unsignalized intersections not included in No Action corridor average calculation.

## Traffic Diversion

The increase in traffic demand throughout the region and within the Aurora Avenue corridor necessitates the construction of additional traffic and pedestrian movement capacity. This additional capacity is needed to serve regional and longer intra-city trips that would potentially divert to parallel, local routes that are not appropriate for traffic other than that that is generated and collected in accessing local residences. Results of the screenline analysis taken between North 155th Street and North 160th Street indicate that traffic on routes parallel to SR 99 would be expected to increase in both the northbound and southbound directions without the project. The proposed action would help reduce the amount of traffic that would divert into neighborhoods. Corridor LOS would be brought to an acceptable level to encourage the use of Aurora Avenue North as the major course of travel. Table 2 indicates the potential traffic diverted from Aurora Avenue North under the proposed action.

<b>Table 2</b> <b>2020 p.m. Peak-Hour Traffic Diversion Comparison:</b> <b>Proposed Action versus the No Action</b>										
Parallel Route										
	Greenwood Avenue North	Dayton Avenue North	Aurora Avenue North	Ashworth Avenue North	Meridian Avenue North	I-5	5th Avenue North	15th Avenue North	25th Avenue North	SR 522
Southbound	5	5	(30)	5	10	0	0	0	0	0
Northbound	5	10	(40)	10	5	0	0	5	0	5

( ) = Reduction Proposed Action vs. No Action  
Source: CH2M HILL, 2002

Access would be limited between Aurora Avenue and North 149th Street to right-in/right-out for southbound Aurora Avenue access to North 149th Street, and left-in access for northbound Aurora Avenue traffic. Traffic from the north portion of Whitman Avenue would need to divert to North 145th Street or turn right onto Aurora Avenue and make a u-turn at North 145th Street for access northward on Aurora Avenue.

The proposed action would include new traffic signals at North 152nd Street and at North 165th Street. These new signals would enable local neighborhood traffic to get access onto Aurora Avenue more easily. Access at North 152nd Street may attract traffic that currently accesses Aurora Avenue from driveways on Aurora Avenue. Also, neighborhood traffic that in the past diverted onto North 155th Street for access by way of the traffic signal on Aurora Avenue would possibly use North 152nd Street. Some neighborhood traffic that in the past diverted north and south on Dayton Avenue or Ashworth Avenue to get access to Aurora Avenue at North 160th Street or North 175th Street may then access Aurora Avenue more directly at North 165th Street. Although the primary access to Shoreline Community College from Aurora Avenue is North 160th Street, a small amount of traffic could attempt to divert to North 165th Street.

The proposed action would include the closure of the east leg of the North 160th intersection with Aurora Avenue. This change would have a small effect on circulation and traffic diversion. The existing traffic volume for the east leg of this intersection is 200 vehicles per hour (eastbound and westbound) in the PM peak hour and approximately 1,800 vehicles per day. Most of this traffic has an origin or destination in the neighborhood area directly adjacent to and to the east of Aurora Avenue. Traffic from Aurora Avenue that used North 160th Street to access areas to the east to access I-5 at North 145th Street would use Aurora Avenue to directly access I-5 at North 145th Street. Traffic from west of Aurora Avenue adjacent to North 160th Street would either divert north to the new signalized intersection to access Aurora Avenue at North 165th Street, or south to access Aurora Avenue at North 155th Street. Some of the residences adjacent to North 160th Street that accessed Aurora Avenue at North 160th Street would use Midvale Avenue, Stone Avenue, Interlake Avenue, and Ashworth Avenue to access North 155th Street. These streets currently have average weekday volumes ranging from about 300 to 1,100 vehicles per day.

Access between North 163rd Street and Aurora Avenue would be limited to right-in/right-out turns for southbound Aurora Avenue access to North 163rd Street, and left-in access for northbound Aurora Avenue traffic. Properties on North 163rd Street wishing to access Aurora Avenue to the north would divert to Linden Avenue and North 165th Street.

## **Crashes and Safety**

The proposed action would provide comprehensive access management improvements to Aurora Avenue North that would include the addition of curbs and gutters, application of driveway width and spacing standards, conversion of the existing two-way left-turn-lane into a channelized left-turn and u-turn lane and a median, restriction of driveways to right-turn-in and right-turn-out only, and provision of the BAT lanes that would allow traffic to safely enter and exit the roadway with fewer conflicting movements and lower risk of crashes. Recent research (Parsonson et al., 1993) indicates that implementing access management can reduce overall crash rates by as much as 26 percent and reduce property-damage-only rates by as much as 40 percent.

<b>Table 3</b> <b>Conflict Point Comparison by Type and Control Environment<sup>1</sup></b>												
	Conflict Point Totals						Proposed Action Relative to No Action					
	Uncontrolled			Controlled			Uncontrolled			Controlled		
Type of Conflict <sup>2</sup>	M	D	C	M	D	C	M	D	C	M	D	C
No Action	184	186	283	24	10	114	--	--	--	--	--	--
Proposed Action	61	71	18	36	15	161	(123)	(115)	(265)	12	5	47

Source: CH2M HILL, 2002

<sup>1</sup>Control Environment: Uncontrolled = no signal controls, Controlled = location with traffic signal

<sup>2</sup>M = Merge; D = Diverge; C = Cross

( ) = Reduction

Focusing left-turns and u-turns at fewer locations is proposed as part of the solution to reduce conflict points and improve traffic safety overall. The u-turn volumes at the focused locations would not be heavy volumes. The locations where u-turns would be heaviest would be at signal-controlled locations. Safe u-turns at uncontrolled locations would require that u-turning vehicles wait for gaps in the traffic flows. The median openings at uncontrolled locations would be located adjacent to driveways at high trip-generating land uses, so those openings would serve left turns as well as u-turns.

Due to the provision of u-turns at signalized intersections, an overlapping green arrow for right turns during left turn and u-turn signal phases will not be provided. Right-turn-on-red traffic must yield to conflicting through and u-turn movements. Signage will be included in the intersections to alert right-turning drivers. This does have an effect on intersection capacity, and this operation has been simulated and reflected in the year 2020 LOS results. Also, protective-permissive signal operations would not be used for left turn and u-turn signals.

## Pedestrian Safety

Pedestrian safety improvements along Aurora Avenue North under the proposed action would include continuous sidewalks; improved pedestrian-scaled lighting throughout the corridor; and improved pedestrian crossings, including some signalized crossings and median refuge islands at crossings of the full width medians. Such elements would reduce pedestrian exposure to conflicts with motor vehicles and might decrease the number of pedestrian-involved crashes along the corridor.

A 7-foot-wide sidewalk would be provided along both sides of the roadway for the roughly 1-mile portion. In addition, a 4-foot-wide landscape and amenity zone would be provided as an additional benefit to pedestrian safety and comfort. The 4-foot-wide amenity zone would buffer pedestrians from vehicular traffic and provide an area for the installation of underground utilities, poles, and vaults that might otherwise conflict with the walkway for pedestrians.

Pedestrian actuators will be installed at accessible heights and the City may also install pedestrian detectors (currently deployed at North 175th Street) at signalized crossings. Wheelchair detectors may also be considered at signalized intersections for inclusion in the design. Accessible interfaces to abutting properties will be included as part of frontage reconstruction where right-of way acquisition occurs as a result of the project.

The east leg of the intersection at North 160th Street would be closed to through-traffic. This would improve pedestrian and bicyclist safety for those crossing North 160th Street on the proposed Interurban Trail.

## **Transit**

Under the proposed action, continuous BAT lanes would be developed in both directions throughout the corridor. These lanes would be shared with traffic entering and exiting the roadway and accessing driveways and cross streets. In addition, enhanced bus zones and bus shelters would be created and transit signal priorities would be established. Enhancing transit features along Aurora Avenue North would encourage more transit use by commuters and each bus trip could potentially mean that there would be 30 to 35 fewer vehicles on the road, reducing traffic congestion. A continuous sidewalk system along the corridor would also make it safer and more convenient to access transit stops.

Transit speed and reliability would be expected to improve over existing conditions, and, as a result, transit would attract more riders. Transit arrivals along the corridor would not be expected to deviate from the route schedules. Schedule reliability could improve between 1 and 1.5 minutes per run. This is mainly due to the fact that buses would stop inline (in the BAT lane) for passengers to board and alight rather than be required to pull out of the travel lane onto the shoulder and wait for a sufficient gap in traffic to return. Based on these improvements, transit under the proposed action would be expected to achieve a much higher mode share of trips along the corridor, especially during peak periods. An additional benefit of improved transit service efficiency is the ability of transit providers to provide more trips for the number of service hours. This would allow higher trip frequencies and, therefore, more transit capacity and overall person capacity in the corridor without additional operating costs.

## **Truck and Emergency Vehicle Access**

The medians included under the proposed action would affect routing and access to properties along Aurora Avenue North. Trucks accessing Aurora Avenue North from regional points would be able to position for right-in/right-out access by using the I-5 interchange at North 175th Street to access properties on the western side and the I-5 interchange at North 145th Street to access properties on the eastern side of the roadway.

Also, Westminster Way provides an alternate truck route that enables trucks to position for right-in/right-out access. Most commercial properties along Aurora Avenue North can be accessed using driveways to sites within 300 feet along cross streets.

Access to properties would be maintained by locating the median openings at major truck access points where practical. The proposed action would have seven nonsignalized median openings along the project limits, respectively. These openings will make it possible for trucks and emergency vehicles to make left-turns into properties along the project. Left turns at median openings will be designed to accommodate a WB-55 design vehicle, which is a truck with a 55-foot-long wheel base and is typically the largest type of vehicle that uses major arterials. (These median openings will not accommodate u-turns by WB-55 design vehicles; trucks of this size coming from I-5 may position for right-in/right-out access by using North 175th Street/I-5 interchange to access properties on the western side of Aurora Avenue North and the North 145th Street/I-5 interchange to access properties on the eastern side. Furthermore, most commercial properties along Aurora Avenue North would continue to be accessible using driveways to sites within 300 feet along cross streets.) Improvements to intersections will also facilitate access for delivery vehicles to commercial properties, frontage streets, and alleys. The City will monitor neighborhood streets for inappropriate truck traffic and take measures to discourage such action.

## **Secondary and Cumulative Impacts**

Secondary and cumulative impacts for the proposed action have not changed since the EA was issued. Please see the EA or the FONSI for a discussion of secondary and cumulative transportation impacts.

## **Land Use**

### **Construction Impacts**

Temporary direct impacts from construction of the proposed action would include noise, dust, traffic congestion, and reduced accessibility to properties. Noise and dust impacts would occur primarily to adjacent commercial development. Temporary traffic congestion would occur along Aurora Avenue North. Reduced access to commercial businesses along Aurora Avenue North could occur during construction.

The proposed action would require landform grading and filling; however, no sensitive areas would be impacted nor buildings demolished.

Additional direct land use impacts would occur during construction. Under the proposed action, approximately 0.81 acre of temporary construction easements would be acquired for construction activities.



## Operational Impacts

Approximately 0.65 acre of new property would be acquired to accommodate new roadway surfaces, shoulder areas, sidewalks, planting strips, and cut-and-fill slopes. See Table 4 for a list of properties with land acquisition.

Commercial business property would be directly impacted by the acquisition of portions of parking areas, driveways, and existing business landscaping along Aurora Avenue North. Some residential property along North 145th Street (0.05 acre) would also be acquired for right-of-way. No buildings would be demolished; however, the proposed sidewalks and landscaping would be directly adjacent or in close proximity to several existing commercial buildings, resulting in a zero setback, as permitted by the City's development code. Some businesses might experience adjustments to the signing above the proposed sidewalks to maintain an 8-foot vertical clearance per AASHTO recommendations.

Of the 2,014 total parking spaces within the project area, the proposed action would impact an estimated 89 parking spaces. Of the total impacted parking spaces, 64 are non-compliant parking spaces and 25 are compliant spaces. A non-compliant parking space is defined as a parking space located within the roadway right-of-way or a space that requires backing onto Aurora Avenue North for ingress or egress. The loss of compliant parking stalls represents approximately 1.2 percent of the total parking in the project area. While businesses rely on the use of non-compliant parking spaces for overflow parking and display purposes, the City is not required to mitigate the loss of non-compliant spaces. There is enough space available on the impacted parcels to reconfigure the parking areas so that the impacts of the lost parking on the affected businesses would not be substantial.

The proposed action would not substantially alter the current residential land use patterns in the City. While improved transportation access in the City might increase pressure for rezoning to higher density residential (and commercial) uses close to the Aurora corridor, these impacts would be regulated by the City's Comprehensive Plan and development regulations. There are no planned zoning or Comprehensive Plan designation changes associated with this action that would influence housing development on Aurora Avenue North. It would not require the demolition of any existing housing units, nor would it require acquisition of land that is planned for housing.

The probable impacts on property values depend on a number of variables and are difficult to predict. In the context of this document, it is not possible to quantify potential impacts on property values in advance. In some situations, anticipated negative impacts of traffic and noise and decreased feelings of neighborhood livability might affect residents' subjective attitudes; however, it is not certain that these impacts will affect property values. There might be countervailing factors that would offset negative impacts. For example, while residential property values might decrease near Aurora Avenue North, they might increase in other parts of the City as a result of the proposed action. Overall, it is likely that market forces (supply and demand)

<b>Table 4</b> <b>Land Acquisition by Property</b>		
<b>Name</b>	<b>Total Area (square feet)</b>	<b>Right-of-Way Acquisition (square feet)</b>
Golden Nugget	12,183	837
Pho Thanh	16,812	460
Hideaway Card Room	23,027	469
Pepperhill/Care Plus	84,096	1,955
Vacant	60,306	57
Shurgard	274,066	2,891
Hardwood Floors	14,798	597
Quest Inn	23,026	475
Enterprise	38,115	1,223
Seattle Ski Rental	14,688	798
Restaurant Supply	73,684	1,281
Aurora Vision	15,952	254
Taco Bell	33,987	940
Goldies	51,158	244
Goldies Management	10,233	225
Parkwood Plaza	224,370	239
Pizza Hut	10,001	1,521
Paper Zone (Aurora Sq.)	30,385	2,154
Chevron	38,248	1,595
European Motors	127,531	3,362
Halecrest Vet Hospital	31,175	646
Lupe's Tienda	22,369	293
Mandarin Palace	22,556	217
Arden Rehabilitation	116,336	174
Seattle Times	35,711	62
Sidestreet Parcels	2,341,966	5,516
<b>Total</b>	<b>3,746,779</b>	<b>28,485</b>

would exert a greater influence on changes in property values near Aurora Avenue North than would project area conditions under the proposed action.

## **Secondary and Cumulative Impacts**

Secondary and cumulative impacts for the proposed action have not changed since the EA was issued. Please see the EA or the SEPA Final EIS (incorporated by reference) for a discussion of secondary and cumulative land use impacts.

## Relationship to Plans and Policies

This section discusses the relationship of the proposed project to relevant existing land use plans, policies, implementation strategies, and development regulations.

### City of Shoreline Comprehensive Plan

The City adopted the Comprehensive Plan on November 23, 1998. The plan includes goals and policies specific to the Aurora corridor that redirect the changes in the corridor from a commercial strip to distinct centers with variety, activity, and interest. The plan seeks to balance vehicular, transit, and pedestrian needs, create a “sense of place” and improve the corridor’s image, protect neighborhoods, and encourage businesses to thrive. Many other policies within the plan that are not specific to the Aurora corridor are similar in nature.

### Land Use Element of Shoreline Comprehensive Plan

The Land Use element includes policies to improve the City’s image on the Aurora corridor as a safe place for business and retail activity. The proposed action would provide additional vehicular, transit, and pedestrian access to businesses along Aurora Avenue North, as well as pedestrian and roadway lighting. It would provide sidewalks along the corridor, pedestrian lighting, and landscaping. Collectively, these improvements would improve the aesthetics of the corridor and would make the corridor more attractive for business and retail activity.

### Transportation Element of Shoreline Comprehensive Plan

*T17: Pursue methods to improve and enhance transit operations on Aurora in Shoreline. Ensure that Aurora continues to function as a primary transit corridor and provide frequent headways and express service to downtown Seattle.*

The Transportation Element includes policies to develop and enhance other transportation modes along the Aurora corridor, such as improving transit, connecting the community via sidewalks and landscaping, incorporating bicycle-friendly designs, and improving automobile and pedestrian signalization to improve safety. The proposed action would be consistent with these policies by providing a BAT lane, sidewalk and landscaped amenity zone, and enhanced bus stop facilities.

### Capital Facilities Element of Shoreline Comprehensive Plan

The Capital Facilities Element includes a policy to enhance infrastructure that will be economically beneficial by creating adequate capacity to move people and goods. The purpose of this project is to provide multimodal transportation services and support economic stability along Aurora Avenue North. Therefore, the improvements under the proposed action would provide added vehicular and transit mobility and pedestrian access to commercial businesses along Aurora Avenue North in the project area. In addition, sidewalks, lighting, and landscaping

improvements would attract greater business and retail activity. Other infrastructure improvements would include stormwater improvements and moving existing utilities underground.

## **Community Design Element of Shoreline Comprehensive Plan**

The Community Design Element includes policies to enhance the attractiveness of the Aurora corridor through wide sidewalks, pedestrian amenities, landscaping, and connecting the community. The proposed action would provide these community improvements.

## **Social**

### **Construction Impacts**

#### **Recreation**

Impacts of construction activities for the proposed action would include the following:

- Dust would be emitted during earthmoving activities by construction vehicles and equipment, from areas within the construction zone that have been disturbed, and where excavated material would be stockpiled.
- There would be additional intermittent noise. Noise sources would include construction vehicles and equipment, construction workers' vehicles, and material delivery vehicles.
- Temporary increased traffic congestion that might hamper access to parks.

Additional noise and dust from construction would be noticeable from the Interurban Trail at the North 155th Street crossing. This at-grade crossing might need to be closed or relocated for a short time during paving and other construction activities. If it is closed, a detour would be provided. One option may be that trail users could use the existing transportation system to continue northward. The City will maintain a crossing for the trail so that its use is not precluded. Construction noise and dust impacts to other parts of the Interurban Trail would be minor because the trail would exist in a relatively noisy urbanized area, the trail would be farther away from the construction area, and any additional impacts would be short term.

Darnell Park, because it is removed from the actual roadway, would experience noise and dust impacts similar to those of the Interurban Trail.

No other recreational facilities would be impacted by construction activities.

## **Regional and Community Growth**

Construction activities would have no impacts on regional and community growth.

## **Services**

Construction activities might have an impact on fire service by increasing response times if service providers are not notified of construction activities that involve lane closures or detours. During construction, emergency vehicles would avoid Aurora Avenue North and use alternate routes (Mehlert, pers. comm., 2001). Police response times would not be affected because patrol cars are dispersed throughout the City and do not depend on any single route to respond to a call (Orndorf, pers. comm., 2001).

Generally, for all utilities, localized service areas could be affected on an intermittent basis during the construction period. The existing underground pipelines in the project area would require protection from potential compression during the pre-load operations.

Access to all nearby public services might be hampered by construction traffic; however, none of these facilities are completely dependent on Aurora Avenue North for access.

No other public services would be affected.

## **Pedestrian and Bicyclist Facilities**

Existing Pedestrian facilities would be maintained during construction or detour would be provided. Noise and dust from construction activities would affect conditions for pedestrians and bicyclists traveling along Aurora Avenue North. These would be temporary impacts that would end after construction.

## **Operational Impacts**

### **Recreation**

The proposed action would not preclude the use of, nor acquire land from, any proposed or existing recreational facility that qualifies as a Section 4(f) property. Seattle City Light is the owner of the land where the future Interurban Trail is proposed by the City of Shoreline between North 145th Street and North 155th Street. The Interurban Trail is a “licensed use” in the utility transmission right-of-way agreed to in a Memorandum of Understanding (MOU). The MOU between the City and Seattle City Light was effective on August 9, 2001.

There would be no impacts from this action that would necessitate the preparation of a Section 4(f) Evaluation. There would be no acquisition of land from the future Interurban Trail for this project nor would this project cause any substantial impairment to the operation of the future Interurban Trail.

The proposed action would incorporate landscape and urban design elements including a median refuge that would highlight the roadway and increase the safety of the corridor for pedestrians and bicyclists. This would provide pedestrians a safer means for crossing Aurora Avenue North, particularly at the Interurban Trail crossing, thereby improving their access to parks and recreational facilities.

The capacity and integrity of Darnell Park would be unaffected by this action because the park does not sit directly adjacent to the roadway. Access could be improved to a limited degree due to the nearby pedestrian and bicyclist improvements on North 165th Street.

No other parks or recreational space at nearby schools would be affected.

## **Regional and Community Growth**

The proposed action would have no direct effect on population growth or demographic growth patterns. Travel patterns in neighborhoods would be expected to decrease because more efficient movement on Aurora Avenue North would reduce the incentive for motorists to use neighborhood streets for shortcuts. No additional developable residential or commercial land would be created and there would be no displacements.

## **Services**

The proposed action would have no impact on local schools, cemeteries, solid waste services, or other government facilities; access to these facilities and services would be improved through improved traffic flow. The presence of a median might make some travel slightly more circuitous, but would not substantially affect service provision.

There would be positive and negative impacts to fire and emergency response times in the project area. Traffic flow improvements on main service route streets would improve response times. Conversely, the landscaped median might increase response times to some locations by forcing emergency vehicles to use the left-turn breaks instead of turning directly into properties. The presence of the median would require the fire department to use more than one vehicle to lay out fire hoses across the street, adding to the complexity of the task. While these issues would add to the department's response time, neither one would be considered substantial (Mehlert, 2001).

Police response times would be unaffected because squad cars do not depend on set routes to reach their destination. Therefore, the median on Aurora Avenue North would not negatively affect the provision of this service (Orndorf, 2001).

Existing underground utilities within the project limits would be field located and surveyed to develop a base map that shows the location of underground utilities and potential conflicts. As part of the proposed action, all overhead utilities would be undergrounded into a joint trench that

would extend under the sidewalk amenity zone planter strip. Overhead service drops to commercial properties would be converted to underground services, and, in some cases, the undergrounding would continue all the way to the buildings. Lids to the underground vaults could be placed in the amenity zone. The utility companies would pay for the service undergrounding up to the right-of-way, at which point the service undergrounding cost would be the responsibility of the property owner. These conversions would be negotiated with the property owners. Final underground plans would be prepared by the utility companies and would be included in the contract documents. The contractor would be responsible for the proposed undergrounding of the utilities.

## **Pedestrian and Bicyclist Facilities**

Pedestrian safety and capacity would be substantially improved and the environment for pedestrians would be enhanced with the addition of 7-foot-wide sidewalks, specially marked pedestrian crossings at intersections, and lighting. Narrowing the sidewalks to avoid building conflicts would not substantially affect the overall safety and capacity of the sidewalks. A 4-foot-wide amenity zone would contain landscaping, lighting, and compatible underground utilities, and would provide a buffer between pedestrians and the roadway.

No formal bicycle lanes would be included as a part of the proposed action; however, bicyclists might use the BAT lane or ride on the sidewalk. The competing uses of the facilities (transit and vehicles in the BAT lane, and pedestrians on the sidewalk) might discourage bicyclists from using these facilities. Bicyclists would be encouraged to use the Interurban Trail for cross-town use.

## **Secondary and Cumulative Impacts**

Secondary and cumulative impacts for the proposed action have not changed since the EA was issued. Please see the EA or the SEPA Final EIS (incorporated by reference) for a discussion of secondary and cumulative social impacts.

## **Environmental Justice**

The purpose of this analysis is to report whether high and adverse human health or environmental effects of the proposed project are likely to fall disproportionately on minority or low-income populations. This analysis focuses on the populations that are located within the areas potentially affected by the proposed action. It examines where any expected high and adverse impacts fall relative to minority and low-income populations. For purposes of this analysis, substantial adverse impacts (as reported in the various sections of the EIS) are considered synonymous with high and adverse impacts as described in EO 12898, DOT Order 5610.2, and FHWA Order 6640.23.

To make a finding that a proposed project is inconsistent with the Environmental Justice policy, two situations must occur at the same time: (1) there must be a minority or low-income population and (2) that population must receive a disproportionately high and adverse environmental or human health impact. As reported in the various sections of this EIS, no substantial adverse impacts are expected as a result of the proposed action. Consequently, none of the impacts of the proposed action can be described as having a high and adverse impact in the context of EO 12898, DOT Order 5610.2, or FHWA Order 6640.23. Because the proposed project would not result in any high and adverse impacts, this analysis concludes that no high and adverse human health or environmental effects of the proposed project are expected to fall disproportionately on minority or low-income populations. The proposed project is therefore consistent with the policy established in EO 12898, DOT Order 5610.2, and FHWA Order 6640.23.

## **Economics**

### **Construction Impacts**

Impacts to businesses during construction might include temporarily increased congestion, noise, dust, and interrupted or more difficult access. Small businesses and businesses that depend on location or drive-by customers are the most likely to be affected. Real or perceived loss of access or substantial changes in access can create disruptions and reductions in revenue. Some businesses might experience adjustments to the signing above the proposed sidewalks to maintain an 8-foot vertical clearance per AASHTO recommendations. Some businesses might experience a temporary increase in revenues from the increased construction and purchases by construction workers.

The construction of the proposed action would also generate sales and use tax revenues for the state and the City. According to the Washington State Department of Revenue, “public road construction is subject to retail sales or use tax on the value of all materials incorporated into the bid.” (Washington State Department of Revenue, 2000). Materials and labor contracts would be subject to the State’s sales or use tax rate of 6.5 percent and the City’s rate of 1.9 percent. Costs associated with the acquisition of new right-of-way and engineering would not be subject to state or local sales or use tax.

### **Operational Impacts**

Operational impacts to economic conditions are discussed in terms of mobility and access, property acquisition, parking impacts, and sales and property tax revenue.



The movement of goods and persons along Aurora Avenue North from North 145th Street to North 165th Street would be improved under the proposed action. The improved mobility would open up the existing 86 businesses along the corridor and the 27 businesses along Aurora Avenue sidestreets to a larger customer base and shorten the commute time for potential employees of businesses within the City. Also, it is likely that redevelopment would occur due to the City's capital investment and the improved image and functionality of the corridor. The BAT lane would make entering and exiting businesses safer and easier for customers. Improved transit access could improve the convenience and desirability of surrounding commercial properties. Increased pedestrian activity could increase the patronage of adjacent retail uses.

Conversely, access to some businesses along Aurora Avenue North might be less direct because of the removal of the continuous two-way left-turn lane and implementation of the median. This might impact businesses on the opposite side of the median that rely on impulse purchases because customers might decide to frequent competitors that are located on the same side of the street. This issue will be partially offset by the inclusion of left-turn and u-turn opportunities.

The utility companies would pay for the service undergrounding up to the right-of-way, at which point the service undergrounding cost would be the responsibility of the property owner. These conversions would be negotiated with the property owners. Final underground plans would be prepared by the utility companies and would be included in the contract documents.

## **Property Acquisition**

Although the proposed project would require acquisition of additional property between North 145th Street and North 165th Street, the proposed alignment would not displace any businesses or employees along the project corridor.

Property acquisition would reduce the amount of parking for some businesses and also reduce the amount of frontage that some businesses use to display their products. Where portions of property are used for display purposes, businesses may be forced to reorient their inventory. The proposed project would require acquisition of approximately 28,000 square feet of new right-of-way, which represents approximately 0.6 percent of the total square footage of the potentially impacted parcels along the corridor.

## **Parking**

There are a total of 2,014 parking spaces within the project area. Property acquisition would impact compliant parking stalls for businesses as shown in Table 5. Some impacted businesses would lose one or two spaces, which would not be a substantial impact. Others would need their parking lots reconfigured to maximize the number of parking stalls available to mitigate parking impacts. In these situations, enough parking stalls would be provided to be compliant with the City of Shoreline's off-street parking requirements (SMC 20.50.390).

An estimated 89 compliant and non-compliant parking spaces are expected to be impacted. Of the total impacted parking spaces, 25 are non-compliant parking spaces that do not conform to City code or are in publicly owned right-of-way and 64 are compliant spaces. While businesses rely on the use of non-compliant parking spaces for overflow parking and display purposes, the City is not required to mitigate the loss of non-compliant spaces. It is estimated that a total of 15 compliant stalls throughout the corridor will be re-gained through re-striping and realignment of parking areas.

No compliant parking designated as ADA accessible parking stalls will be lost as a result of property acquisition associated with the project, and the loss of parking stalls will not affect ADA accessibility to individual businesses. Care Plus currently has a non-compliant parking stall designated a handicapped parking stall. The parking lot for Care Plus will be reconfigured to provide compliant ADA accessible Handicapped parking.

## **Sales and Property Tax Revenue**

Businesses along the corridor might experience a modest increase in retail sales activity due to the increased mobility. The congestion relief provided by the project might entice more potential customers to the area. Any increase in sales activity would also benefit the City's revenues in the form of increased sales tax revenues; however, the overall impact on the City would likely be small.

In the long term, the loss of property tax revenues due to property acquisition might be offset by an increase in property tax revenues associated with increased property values. The roadway improvements have the potential to contribute to an increase in property values within the corridor. Property values will be determined by market forces, which are driven by supply and demand. The roadway improvements will improve access to businesses in the area, which might make properties more attractive for businesses and new development. Other factors that affect property values include local zoning and land use regulations, local development trends, and other social and economic factors.

Table 6 shows the initial property tax impacts to the City. The assessed value of the additional right-of-way needed to construct the proposed action would be approximately \$542,840. The taxable property within the right-of-way generates about \$868 in revenues for the City, or less than 0.1 percent of 2000 budgeted property tax revenues. The initial property tax impact would not have a significant impact on the City's overall tax revenues.

<p align="center"><b>Table 5</b> <b>Parking Impacts</b></p>							
<b>Business Name</b>	<b>Address on Aurora Ave</b>	<b>Parcel SF</b>	<b>SF Acquired</b>	<b>Total Stalls on Parcel (Compliant and Non-Compliant)</b>	<b>Compliant Parking Stalls Impacted</b>	<b>Non-Compliant Parking Stalls Impacted</b>	<b>Stalls Remaining After Mitigation</b>
Golden Nugget Casino	14507	12,183	837	20	7	1	17
Pho Thanh	14513	16,812	460	23	6	0	22
Hideaway Card Room	14525	23,027	469	52	0	3	49
Pepperhill/Care Plus	14701	84,096	1955	105	0	13	92
Shurgard	14540	274,066	2891	6	1	0	5
Seattle Ski Rental	14915	14,688	798	15	3	0	13
Aurora Vision	14926	15,952	254	15	2	0	13
Goldies Management	15036	10,233	225	18	0	6	12
Maddy's Automotive	15205	16,041	0	9	0	1	8
Allstate/Pho Hoa	15215	19,722	0	12	0	1	11
Pizza Hut	15565	10,001	1521	13	5	0	12
Four Seasons/ Shay's	15744	17,473	0	32	0	1	31
Lupe's Tienda/Vacant	16053	22,369	293	19	0	8	11
Mandarin Palace	16301	22,556	217	38	0	9	29
Arden Rehabilitation	16257	116,336	174	50	1	0	49
Sidestreets Crossing Aurora*				445	0	21	424

\*Includes 36 parcels spread over N 145th, N 149th, N 152nd, N 155<sup>th</sup>, Westminster Way, N 160th, N 163rd, N 165th as well as the project limits on Aurora south of 145th and north of 165th.

<p align="center"><b>Table 6</b> <b>Estimated Initial Property Tax Impact</b></p>			
	<b>Estimated Assessed Value of Right-of-Way</b>	<b>Initial Property Tax Impact <sup>a</sup></b>	<b>Percent of Budgeted 2000 Property Tax Revenues</b>
Property Tax	\$542,840	\$868	0.015%

Source: King County Department of Assessments, 2000a and 2000b

<sup>a</sup> Includes City of Shoreline portion of property tax only.

## Secondary and Cumulative Impacts

Secondary and cumulative impacts for the proposed action have not changed since the EA was issued. Please see the EA or the SEPA Final EIS (incorporated by reference) for a discussion of secondary and cumulative economic impacts.

# Air Quality

## Construction Impacts

Construction activities primarily generate PM<sub>10</sub> and PM<sub>2.5</sub> and small amounts of CO and NO<sub>x</sub> from construction machinery exhaust. Specifically, the sources of particulates would be dust from earth-moving excavation activities (termed “fugitive dust”) and diesel exhaust. High PM<sub>10</sub> concentrations typically occur in fall and winter during periods of air stagnation and high use of wood burning for home heating.

Fugitive dust consists of fine particles of earth and sand that become airborne and then disperse, typically as a result of earth-moving activities, demolition, general construction activities, and vehicles traveling on unpaved or dusty roads. Trucks exiting unpaved sites or carrying soil might track dirt onto adjacent paved streets, causing fugitive dust that is dispersed by subsequent traffic. This particulate matter would be carried by wind to nearby residences, businesses, and public areas. Demolition activities would also occur in the project area, in the form of removal of concrete and asphalt paving. This would be another source of fugitive dust emissions on a temporary basis.

The amount of fugitive dust that would be raised by construction activities and the distance that it would disperse depends on the dryness and texture of the soil, the wind velocity, and the amount of machinery and truck travel on unpaved surfaces. Fugitive dust is most common during dry, windy weather. The larger particles would settle out near the source, while finer particles would be dispersed farther from the construction site. The quantity of particulate emissions generated from construction activities would be proportional to the area of construction. At this time, it is not possible to provide a quantitative estimate of the particulate emissions that could be generated; however, there would be a noticeable temporary increase in particulate emissions if no mitigation measures are implemented to control them. It is typical for construction projects to implement mitigation (as described later in this report) to offset temporary increases in particulate emissions.

## Operational Impacts

The pollutant of primary concern when assessing localized impacts of transportation projects is carbon monoxide (CO). High CO concentrations tend to accumulate near areas of heavy traffic congestion where average vehicle speeds are low. Localized impacts are assessed by estimating maximum ambient CO concentrations near the roadways affected by the project. The concentrations are compared to the national ambient air quality standards for CO. A project’s impact is considered to be adverse if the project creates a new CO violation or exacerbates an existing violation.

In general, the purpose of the project is to provide additional capacity in the corridor, thereby reducing the delay experienced by vehicles traveling in that corridor. Less delay would mean higher travel speeds, less idling time at intersections and a reduction in CO emissions. Completion of the Business Access/Transit Lane is anticipated to improve transit speed and is anticipated to encourage riders to switch from single-occupancy vehicle mode. Also, buses would likely experience less delay associated with reentry into the transit lane, resulting in a decrease in emissions from buses idling at bus stops. Therefore, overall, the project is generally expected to have a beneficial impact on localized air quality.

Although completion of the project would have a beneficial impact overall and would not result in an overall increase in traffic volumes within the project area, completion of the project may redistribute traffic at adjacent intersections and potentially cause localized CO "hot spots." For this reason, the proposed action was analyzed to determine if the proposed signalization and lane geometry modifications would result in adverse impacts to local air quality.

Selection of the intersections analyzed in this study were based on the predicted traffic volumes and level of service (LOS) at each intersection for the opening year (2004), and the design year (2020). Using this selection criteria, this analysis focused on three signalized intersections within the project limits:

- SR 99 at North 145th Street,
- North 155th Street, and
- North 160th Street.

The 1-hour CO concentrations for the proposed action are shown in Table 7. The predicted 1-hour CO concentrations at all three intersections in 2004 and 2020 are less than the 1-hour CO NAAQS (35 ppm). The CO concentrations predicted are the same as those for the no action scenario in the vicinity of SR 99 and North 145th Street, and slightly higher than those of the no action scenario in the vicinity of SR 99 and North 155th Street and SR 99 and North 160th Street.

The 8-hour CO concentrations for are shown in Table 8. The predicted 8-hour CO concentrations in 2004 and 2020 are greater than the 8-hour CO NAAQS (9.0 ppm) at the North 145th Street intersection. Although predicted 8-hour concentrations are higher than the NAAQS at the North 145th Street intersection it would be lower than under existing conditions, and would not create a new CO violation of the NAAQS, nor would it worsen an existing violation. CO concentrations for in the vicinity of SR 99 and North 155th and North 160th Streets are greater than those predicted for these intersections without the project, but are less than the NAAQS. Therefore, completion of the proposed action would not cause a substantial localized CO impact for the three intersections evaluated in this study.

Table 7 Maximum 1-Hour CO Concentrations (ppm) at Aurora Avenue Intersections						
Intersection	1-hour NAAQ S	2000 Existing	2004		2020	
			No Action	Proposed Action	No Action	Proposed Action
North 145th Street	35	16.0	15.7	15.7	15.0	15.0
North 155th Street	35	12.5	10.4	12.6	9.80	12.4
North 160th Street	35	11.2	10.2	10.2	9.90	10.6

Table 8 Maximum 8-Hour CO Concentrations (ppm) at Aurora Avenue Intersections						
Intersection	8- hour NAAQ S	2000 Existing	2004		2020	
			No Action	Proposed Action	No Action	Proposed Action
North 145th Street	9	11.2	11.0	11.0	10.5	10.5
North 155th Street	9	8.75	7.28	8.82	6.86	8.68
North 160th Street	9	7.84	7.14	7.14	6.93	7.42

## Secondary and Cumulative Impacts

Secondary and cumulative impacts for the proposed action have not changed since the EA was issued. Please see the EA or the SEPA Final EIS (incorporated by reference) for a discussion of secondary and cumulative air quality impacts.

## Noise

### Construction Impacts

During construction, sound levels would temporarily increase near construction sites due to the use of heavy equipment and the transport of construction materials. Noise levels generated during construction vary widely, reflecting the great variety of equipment used during construction. At times, some equipment might not operate or might sit with engines idling for long periods of time. However, at other times, several pieces of the equipment might operate simultaneously.

### Operational Impacts

To evaluate whether or not noise abatement should be considered, FHWA's STAMINA model was used to predict noise levels at each sound-level measurement location. The results of the noise modeling analysis for future background levels (levels without the project) and the proposed project levels for 2020 (project design year) are presented in Table 9. The modeling accounts for the addition of northbound and southbound lanes for transit and right-turn vehicles.

Sound-level measurement locations listed in Table 9 represent sensitive receptors that might be affected by the project. For all three receiver locations, the predicted exterior noise levels were obtained for 2020. Depending on the type of sound-level measurement location, various FHWA Noise Abatement Criteria would apply.

<b>Table 9</b>							
<b>2020 Predicted p.m. Peak L<sub>eq</sub> Noise Levels (dBA)</b>							
<b>Receiver</b>	<b>2020 No Action</b>	<b>2020 with Project—Exterior Noise Levels</b>	<b>Project Effect</b>	<b>FHWA Category B</b>	<b>Substantial Increase &gt;10 dBA</b>	<b>2020 with Project—Interior Noise Levels</b>	<b>FHWA Category E</b>
S-1	61	61	0	67	No	--	--
S-2	69	69	0	N/A	No	44	52
S-3	67	67	0	N/A	No	42	52

As shown in Table 9, predicted noise levels at sound-level measurement Receiver S-1 were compared to the FHWA Activity Category B (exterior). Predicted 2020 exterior noise levels were obtained for sound-level measurement Receiver S-1 to determine noise levels near affected residences. Table 9 indicates that the predicted exterior noise levels for 2020 do not increase above future levels without the project.

For sound-level measurement Receivers S-2 and S-3, predicted 2020 exterior noise levels were obtained for the highway-facing walls of motel rooms. Normally, only outdoor areas of frequent human use are considered for noise abatement; however, predicted 2020 interior noise levels were provided for Receivers S-2 and S-3 because there are no outdoor activities for these sound-level measurement locations. Therefore, the FHWA Category E Noise Abatement Criteria are the governing criteria for these sound-level measurement locations. Compliance with the Interior Noise Abatement Criteria of 52 dBA is determined by examining the building and estimating its ability to reduce noise levels. The most important factors are the percentage of the walls used for windows, the type of windows (single-pane or double-pane), and wall construction details (masonry or wood frame). All the motels have double-pane windows with a small percentage of wall area in glass. Wall construction was either masonry (at Receiver S-2) or wood frame (at Receiver S-3). This type of construction will achieve a 25 dBA reduction in noise levels for both locations (23 CFR Part 772, 1982). Interior sound levels were obtained for these two locations by subtracting 25 dBA from the modeled 2020 exterior noise level. As shown in Table 9, noise at these locations does not exceed the Interior FHWA noise criteria of 52 dBA.

## Secondary and Cumulative Impacts

Secondary and cumulative impacts for the proposed action have not changed since the EA was issued. Please see the EA or the SEPA Final EIS (incorporated by reference) for a discussion of secondary and cumulative noise impacts.

## Water Quality/Surface Water

### Construction Impacts

During construction, accidental or inappropriate discharge of sediment from cleared and excavated areas and/or spills of fuel, lubricants, and other construction-related hazardous material could result in these materials entering project area streams via stormwater runoff. Erosion on construction sites could also result in the movement of sediment to downstream drainage ways, surface waters, and adjacent properties. Introduction of contaminants into the streams could adversely affect aquatic communities, but the volume of such contaminants would likely be negligible barring a catastrophic event. These construction-related impacts could have an adverse effect on the aquatic environment if the project were unregulated. However, the project must meet erosion and sediment control regulations, particularly the requirements in the King County's *Surface Water Design Manual* (SWDM) and the NPDES regulations. As a result, the potential for erosion and transport of sediment away from the construction site should be minimized.

A stormwater pollution prevention plan would be prepared for the Aurora Corridor Project following the requirements of the NPDES General Permit for Stormwater Discharges Associated with Construction Activities. Construction-related best management practices (BMPs) would be used to reduce the erosion potential both during and after construction and to minimize the amount of sediment carried away from the construction site.

The project site presents a relatively small potential for erosion to occur because it is mostly covered with impervious surfaces, there are no steep slopes in the project area, there are only a few locations where extensive excavation or fill would occur, and there are no stream channels or other waterbodies within the project area. With proper use of BMPs, impacts should be minimal.

### Operational Impacts

Change in the amount of impervious surface area from which stormwater drains to a water body is a major factor in determining the impacts of a roadway project on a water body. There are two types of effects that result from changes to impervious surface area: hydraulic effects and water quality effects. Hydraulic effects are related to changes in flow, such as increased peak flows causing stream channel scour and the scour affecting the habitat of an aquatic species. Water



quality impacts are related to changes in the pollutant load that is carried in the runoff to the water body. The majority of the pollutants that could be picked up by the runoff occur on the areas that are subject to vehicular traffic, such as the road itself, road shoulders, driveways, and bike lanes that are part of a travel lane, i.e. the pollutant-generating impervious surfaces (PGIS). Little pollutant load is generated on sidewalks.

Most of the project area is presently covered with impervious surfaces, primarily pavement (road, road shoulders, driveways, parking areas) and a few sidewalks. The proposed post-project condition includes vegetated medians in the roadway and vegetated planter strips adjacent to the sidewalks. As a result, there would be only small increases in the impervious area.

Changes in the quantity of pollutants that are on a road and available to be picked up and carried by stormwater runoff into the downstream water bodies are related to changes in the amount of traffic using the roadway. No change in the amount of traffic on Aurora Avenue North within the project area is expected due to the proposed action relative to conditions without the project. Therefore, the proposed action would not cause an increase in the pollutant load available to be transported to the downstream water bodies due to changes in the amount of traffic.

Under existing conditions, there are very few sidewalks within the project area. Under the proposed action there would be an extensive sidewalk system. The sidewalks would be constructed mostly over areas that are presently driven on by vehicles (road shoulders, driveways, parking lots). As a result, the amount of PGIS in the Boeing Creek and Thornton Creek basins (i.e., the total area within the project limits over which vehicles can drive) would substantially decrease. Since the PGIS would decrease and the amount of vehicular traffic would not change, the proposed action would not cause the water quality of the stormwater runoff leaving the project area to deteriorate. In addition, the City of Shoreline has indicated that where feasible all the stormwater runoff from the PGIS within the project area should receive basic treatment. As a result, the proposed action should result in an improvement in the water quality of the stormwater leaving the project area and hence an associated small improvement in the water quality of the receiving waters.

The stormwater detention and quality treatment facilities proposed for the proposed action were selected based on the City of Shoreline regulations and on meeting ESA “no impact” requirements. The proposed stormwater facilities for each of the basins would be designed based on the regulations that relate to the net change in the overall impervious surfaces within a drainage basin. The relative increases or decreases in new impervious surfaces within each basin and the required stormwater detention and/or treatment facilities are described below.

Table 10 summarizes the net change in pervious, impervious, and pollutant generating surfaces for each drainage basin. The proposed action would result in an increase in the amount of impervious surface in the Boeing Creek basin by approximately 1,200 square feet out of a total project area of 767,500 square feet in this basin. This is less than the minimum 1,500 square feet that triggers the requirement to provide flow control facilities. As a result, no flow control facilities would be included for the Boeing Creek basin under the proposed action, unless the

estimated increase in impervious area changes during the design process and exceeds 1,500 square feet. Therefore, there would be a very small increase in the stormwater runoff volumes and peak flow rates discharged to Boeing Creek. However, the increase in impervious area would be so small, that the proposed action should not have a flow- or volume-related impact on the aquatic habitat in Boeing Creek.

In the Thornton Creek basin, there is expected to be only a slight increase of impervious areas of approximately 1,100 square feet within a total project area of 40,000 square feet in this basin, as shown in Table 10. The increase occurs at North 152nd Street due primarily to the proposed addition of sidewalks along the north side of the road. Although the increase is less than the regulatory threshold for requiring flow control (1,500 square feet), stormwater detention facilities will be included as part of the project design to prevent further degradation of the Thornton Creek basin. Since the increase in impervious areas in the Thornton Creek basin would be very small and flow control facilities would be used to minimize the changes in stormwater flows from the project area, the flow-related impacts to Thornton Creek should be minimal. Due to the very small increase in impervious area, there would be a very small increase in the total stormwater runoff volume discharged to Thornton Creek. However, the increase in impervious area is so small, that the proposed action should not have a stormwater volume related impact on the aquatic habitat in Thornton Creek.

There is expected to be no change in impervious surfaces in the West Lake Washington (Densmore) basin, as shown in Table 10. However, because this area is within the City of Seattle, the City's municipal code might require stormwater runoff to be routed through a detention facility prior to release into the City of Seattle stormwater drainage system. This facility would most likely be an underground detention vault located under the roadway at or near the intersection of Roosevelt Way and Aurora Avenue. Since there would be no change in impervious areas in this basin, the peak flows and volumes of stormwater runoff delivered to the downstream system should be unchanged. If a detention vault is also used, there should be decreases in the peak runoff flows delivered to the downstream system.

<b>Table 10 Impervious Areas</b>					
<b>Basin</b>	<b>Total Project Area (square feet)</b>	<b>Proposed Impervious Area (square feet)</b>	<b>Existing Impervious Area (square feet)</b>	<b>Net Change in Impervious Area (Proposed – Existing) (square feet)</b>	<b>Net Change in PGIS (Proposed – Existing) (square feet)</b>
Boeing Creek	767,500	709,500	708,300	1,200	-58,200
Thornton Creek	40,000	39,500	38,400	1,100	-1,400
West Lake Washington	8,900	8,900	8,900	--	--

There would be an overall net decrease in the PGIS due to the proposed creation of sidewalks, amenity zones, and vegetated median, where roadways currently exist. The net decrease in PGIS

will be approximately 58,200 square feet in the Boeing Creek basin, 1,400 square feet in the Thornton Creek basin, and no change in the West Lake Washington (Densmore) basin. However, a large area of existing PGIS would be redeveloped, i.e. removed down to dirt or base course and replaced. As a result, there would be more than 5,000 square feet of redeveloped PGIS in each of the three basins and the SWDM would require installation of basic stormwater quality treatment facilities to treat the runoff from the new and redeveloped PGIS. The City has indicated that basic stormwater quality treatment measures should be provided where feasible for the runoff from all the pollutant-generating surfaces within the proposed project limits (new, redeveloped, and existing).

Because there would not be a net increase in PGIS of 5,000 square feet or more in any of the basins, enhanced stormwater quality treatment measures following the requirements of Washington State Department of Ecology's 2001 *Stormwater Management Manual for Western Washington* (SMMWW) would not be required. Since the SWDM is more conservative in this instance, it will be followed for the quality treatment facilities design. The proposed action would include installation of basic stormwater quality treatment facilities to treat as much as possible of the runoff from the road surfaces in the proposed project area in each of the three basins. As indicated above, the stormwater treatment facilities would most likely be manufactured stormwater treatment devices such as vortex or gravity-type separators or stormwater filter systems installed in vaults. These facilities are expected to be installed under the roadway and/or sidewalk in the immediate vicinity of the detention facilities.

In addition to these stormwater quality treatment facilities, special oil control facilities would be installed at the intersections of Aurora Avenue North with North 145th Street and North 155th Street.

Because runoff from the existing road is not currently treated, implementation of the proposed stormwater quality treatment should result in a substantial decrease in the pollutant load (especially total suspended solids and other associated pollutants) carried by the stormwater runoff from the roadway to each of the receiving waters. The biggest impact should be an improvement in the overall water quality in Boeing Creek since most of the proposed project area is within the Boeing Creek basin. The installation of the stormwater quality treatment facilities in the Thornton Creek and West Lake Washington (Densmore) basins might provide a slight improvement in the water quality of the receiving streams, but because the proposed project area within these basins is so small relative to the total drainage area in these basins, the improvements are not expected to be discernible.

## **Secondary and Cumulative Impacts**

Secondary and cumulative impacts for the proposed action have not changed since the EA was issued. Please see the EA or the SEPA Final EIS (incorporated by reference) for a discussion of secondary and cumulative surface water and water quality impacts.

# Wildlife, Fisheries, and Vegetation

## Construction Impacts

During construction, accidental or inappropriate discharge of sediment from cleared and excavated areas and/or spills of fuel, lubricants, and other construction-related hazardous material could result in these materials entering streams in the vicinity of the project via stormwater runoff. BMPs would be implemented during construction and the volumes of such contaminants that might reach the receiving waters would be expected to be negligible.

## Operational Impacts

In general, hydraulic and water quality effects have the potential to impact wildlife habitat. For this project, potential hydraulic effects are related to changes in flow, such as increased peak flows causing stream channel scour that could affect the habitat of an aquatic species. Potential hydraulic impacts would be small because there would be only small changes in impervious surface area in each of the three basins. In addition, stormwater detention facilities would be used to reduce the peak flows from the net new impervious areas. This would result in relatively little change in the peak stormwater flows entering the downstream creeks and therefore there should be little or no impact on the fish populations due to changes in flows.

The potential water quality effects are related primarily to the pollutants that could be carried in stormwater runoff from a project area to a receiving water. Runoff from as much as possible of the pollutant generating surfaces would be treated for water quality to comply with city, state, and federal requirements. As a result, water quality related effects on the receiving waters are expected to be minimal or even slightly beneficial. Therefore, there should be little or no impact on the fish populations due to changes in water quality of the receiving waters.

Under the proposed action, vegetation removal and/or disturbance would be minimal. The vegetation that would be removed during project construction would primarily be scattered ornamental and invasive trees and shrubs that provide little, low-quality habitat for terrestrial species. There is limited habitat within the project area for state or federal threatened, endangered, or sensitive terrestrial species. Potential impacts to terrestrial species that might inhabit the road corridor would be minimal.

## Secondary and Cumulative Impacts

Secondary and cumulative impacts for the proposed action have not changed since the EA was issued. Please see the EA or the SEPA Final EIS (incorporated by reference) for a discussion of secondary and cumulative wildlife, fisheries, and vegetation impacts.

## Historic and Archaeological Resources

The Aurora Corridor Project area contains no prehistoric or historic archaeological sites that are currently listed on, nominated to, or determined eligible for the NRHP or the WRHP. Similarly, the project area contains no historic buildings or structures that are currently listed on, nominated to, or determined eligible for the NRHP or WRHP.

The following properties appear to lack integrity or architectural merit, but have some historic associations:

- The Pershing Interurban Bulkhead, located at North 155th Street and Aurora Avenue North
- The Hide-a-Way Tavern, located at 14525 Aurora Avenue North

A number of post–World War II commercial buildings retain some degree of physical integrity, but have no particular architectural or historic significance other than their late association with highway and suburban strip-commercial activity.

An archaeological reconnaissance survey revealed that the entire project area (the area within the limits of the proposed roadway improvements) lacked any areas of open/exposed native sediments. Where the ground surface was not paved, it was covered with gravel or landscaping.

The project area is located in an area of low sensitivity for the presence of Native American archaeological sites. Aurora Avenue North crosses no streams or rivers, is located well away from the shores of Puget Sound and Lake Washington, and is located away from inland lakes and bogs such as Echo Lake, Ronald Bog, and Haller Lake. Historic archaeological sites, if present, would probably post-date the 1920s when Euro-American development increased in the area.

## Construction Impacts

The temporary presence of construction machinery and vehicles is not expected to have any impacts on properties that are either eligible or potentially eligible for listing on the NRHP or WHRP. Although none of the Tribes contacted by letter responded to a solicitation to provide information on possible traditional cultural properties in the project area, short-term construction impacts could adversely affect traditional cultural properties that might be present.

## Operational Impacts

The proposed action would have no long-term proximity impacts to properties potentially eligible for listing on the NRHP or WHRP. The expansion of the right-of-way along Aurora Avenue North would bring traffic and its accompanying noise and vibration closer to the historic properties, potentially changing the nature of their historic settings. Because none of these properties are believed to be eligible for inclusion in the NRHP or WRHP, these possible proximity impacts need not be mitigated.

If archaeological sites are discovered during construction, they would either be avoided or would be subject to mitigation measures if avoidance is not possible. Once constructed the project should not produce any long-term operation impacts to archaeological sites.

## **Secondary and Cumulative Impacts**

Secondary and cumulative impacts for the proposed action have not changed since the EA was issued. Please see the EA or the SEPA Final EIS (incorporated by reference) for a discussion of secondary and cumulative historic and archaeological resource impacts.

## **Visual Quality**

### **Construction Impacts**

Temporary visual impacts would include the presence of construction equipment, materials, signage, and staging areas in the construction zone that would reduce the visual quality of the immediate area during construction.

Temporary lighting might be necessary for nighttime construction of certain project elements or at certain locations. This temporary lighting could impose impacts on nearby residential areas by exposing residents to uncomfortable glare from unshielded light sources or by increasing ambient nighttime light levels.

### **Operational Impacts**

The visual impacts of a project result from two phenomena: physical changes to the visual environment and viewer response to those changes. It is simple to identify visual changes to the environment, but it is more difficult to identify viewer response because viewers can have different values and perceptions. For this analysis, it is assumed that if the vividness, intactness, and unity of the project improve then viewer response to that change is favorable, and if these qualities worsen then viewer response is unfavorable.

The elements that would have the greatest impact on visual quality would be the streetscape improvements, including defined driveways, curbs, gutters, and sidewalks, and landscaping within the amenity zones and medians. The sidewalks would be 7 feet wide with a 4-foot-wide amenity zone. Trees in the amenity zone would be at least 18 inches from the curb. The sidewalks would be continuous throughout the project area. In addition, utility lines would be placed underground and new roadway and pedestrian lighting would be installed. Two planting and paving schemes would be applied to the Aurora Corridor Project: the “green” treatment and the “urban” treatment. Within the urban treatment/high pedestrian areas, special paving treatment would be used. The specifications for this paving treatment have not yet been

determined. However, the special paving would be designed to avoid tripping hazards and differential settlement. Any changes in paving type or textures would be ADA compatible. The tree planting concept would use maple trees with a caliper no greater than 4 inches. Different maple trees would be planted along the project area so that the autumn color of the leaves would be different in different areas of the project. The size and scale of the trees, as well as the spacing between plantings, would avoid conflicts with buses and sight distance problems.

## Visual Change

Table 11 summarizes the visual quality impacts of the proposed action quantitatively. The landscaping and other streetscape improvements would make the project area distinctive and vivid, and the specialized elements, such as textured paving, at the connections would provide visual interest. The visual intactness of the project area would be improved because utilities would be placed underground, which would eliminate the poles and lines that currently clutter the horizon. Visual unity would also be improved because the proposed street and landscape improvements would help create visual continuity and unify the street edge by providing consistent elements along the length of the project area.

**Table 11**  
**Visual Analysis Matrix**

Parameter	No Action					Proposed Action				
Viewpoint	1	2	3	4	5	1	2	3	4	5
View Orientation	N	S	E	W	E	N	S	E	W	E
View Distance										
Foreground										
Middleground	√	√				√	√			
Background			√	√	√			√	√	√
Viewer Position										
Inferior										
Level			√					√		
Superior	√	√		√	√	√	√		√	√
Vividness										
Landform	1	1	1	1	1	1	1	1	1	1
Waterform	0	0	0	0	0	0	0	0	0	0
Vegetative	1	1	1	2	2	8	8	8	8	8
Human-Made	1	1	1	1	1	7	7	7	7	7
Average	0.75	0.75	0.75	1	1	4	4	4	4	4

**Table 11**  
**Visual Analysis Matrix**

Parameter	No Action					Proposed Action				
Viewpoint	1	2	3	4	5	1	2	3	4	5
View Orientation	N	S	E	W	E	N	S	E	W	E
Intactness										
Development	3	3	3	4	4	3	3	3	4	4
Encroachment	2	2	2	3	3	5	5	5	6	6
Average	2.5	2.5	2.5	3.5	3.5	4	4	4	5	5
Unity										
Overall	1	1	1	1	1	7	7	7	7	7
<b>Total Visual Quality</b>	<b>1.4</b>	<b>1.4</b>	<b>1.4</b>	<b>1.75</b>	<b>1.75</b>	<b>5</b>	<b>5</b>	<b>5</b>	<b>5.3</b>	<b>5.3</b>

## Viewer Response

Pedestrians and transit riders would likely have the most positive response to the improvements. Their experience of the visual environment would change the most because they would have the greatest exposure to all of the roadway and streetscape improvements. Pedestrians and transit riders would be able to see the special treatment on the sidewalks. The street trees and vegetation in the amenity zone not only would add visual interest but also would serve as a 4-foot-wide buffer between pedestrians and traffic. Transit riders would have visually interesting shelters and pedestrians would have distinctive and clearly identifiable crossings.

Vehicle occupants would also likely have a positive response to the improvements. As vehicle occupants enter the project area, they would see a more unified environment; the visual clutter created by utility lines and the unclear street edge would be replaced with a raised and continuous sidewalk and trees defining the street edge. These trees would be particularly interesting during the autumn when the leaves change color.

Residents would experience benefits similar to those of vehicle occupants: the removal of utility lines would reduce the visual clutter and the street trees would provide visual interest.

## Visual Impact

The proposed action would have a positive impact on the visual quality of the project area.

## Secondary and Cumulative Impacts

Secondary and cumulative impacts for the proposed action have not changed since the EA was issued. Please see the EA or the SEPA Final EIS (incorporated by reference) for a discussion of secondary and cumulative visual quality impacts.



## Hazardous Materials

### Construction Impacts

The potential construction impacts of the proposed action is similar to the alternatives in the EA. Table 12 has a survey of land uses encountered by the proposed action likely to generate hazardous materials.

<b>Table 12 Survey of Land Uses</b>					
<b>Name</b>	<b>Total Area (square feet)</b>	<b>Right-of-Way Take (square feet)</b>	<b>% Take of Total</b>	<b>Land Use</b>	<b>Land Use Likely to Generate Hazardous Materials?</b>
Golden Nugget	12,183	837	6.9	COM	NO
Pho Thanh	16,812	460	2.7	COM	NO
Hideaway Card Room	23,027	469	2.0	COM	NO
Pepperhill/Care Plus	84,096	1,955	2.3	COM	YES
Vacant	60,306	57	0.1	VAC	NO
Shurgard	274,066	2,891	1.1	IND	NO
Hardwood Floors	14,798	597	4.0	COM	NO
Quest Inn	23,026	475	2.1	COM	NO
Enterprise	38,115	1,223	3.2	COM	YES
Seattle Ski Rental	14,688	798	5.4	COM	NO
Restaurant Supply	73,684	1,281	1.7	COM	NO
Aurora Vision	15,952	254	1.6	OFF	NO
Taco Bell	33,987	940	2.8	COM	NO
Goldies	51,158	244	0.5	COM	NO
Goldies Management	10,233	225	2.2	OFF	NO
Parkwood Plaza	224,370	239	0.1	COM	NO
Pizza Hut	10,001	1,521	15.2	COM	NO
Paper Zone (Aurora Sq.)	30,385	2,154	7.1	COM	NO
Chevron	38,248	1,595	4.2	COM	YES
European Motors	127,531	3,362	2.6	COM	YES
Halecrest Vet Hospital	31,175	646	2.1	COM	NO
Lupe's Tienda	22,369	293	1.3	COM	NO
Mandarin Palace	22,556	217	1.0	COM	NO
Arden Rehabilitation	116,336	174	0.1	RES	NO
Seattle Times	35,711	62	0.2	OFF	NO

\*Based on Table 447-3, WSDOT Environmental Procedures Manual M31-11, July 2001, for land uses. Information on presence or absence of hazardous building materials not available.

## Operational Impacts

There is the potential for release to the environment of hazardous substances used or transported during routine operation and maintenance of roadways.

If cleanup alternatives selected for the identified contaminated sites in or adjacent to the project corridor include long-term onsite treatment of soils or groundwater, there is the potential that contamination may be present at the time of acquisition of right-of-way for the project. This could result in transfer to the project owner of the liability for risk to human health for persons on the site and risk to the environment. Similarly, if contamination remains present after construction on or adjacent to the right-of-way and contaminant migration pathways are altered by construction of underground utility corridors, operation of the utility corridors could result in risk to human health and the environment. The acquisition of an easement or title to properties with potential environmental contamination could create significant long-term environmental liability or management concerns. Longer-term environmental liabilities might include financial responsibility for cleanup of onsite contamination or for remediation activities necessitated by offsite migration of hazardous substances.

## Secondary and Cumulative Impacts

Secondary and cumulative impacts for the proposed action have not changed since the EA was issued. Please see the EA or the SEPA Final EIS (incorporated by reference) for a discussion of secondary and cumulative hazardous materials impacts.

ATTACHMENT 4

## Mitigation Commitment List

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These commitments are adopted as part of FHWA’s final decision on the proposed action and are listed to “assist with agency planning and decisionmaking” and to “aid an agency’s compliance with NEPA when no environmental impact statement is necessary” [40 CFR 1501.3(b), 1508.9(a)(2)].

## **Transportation**

Impacts related will be mitigated to the greatest extent possible through the application of construction best management practices (BMPs), including traffic control plans, construction staging plans, and continual communication and coordination with businesses along the project limits.

Traffic on Aurora Avenue will be notified to use alternate routes during periods of measurable disruption or traffic, and regional transit service will be used to provide additional person-movement capacity at these times.

Planning adequate traffic control during design and construction of this project are key to a smooth, successful, and safe construction. Continued public information and opportunities for input will be provided throughout the period of construction.

Partnerships with adjacent businesses will be maintained throughout the construction period to ensure that business access needs are met during construction.

See the following Neighborhood Traffic Impact section for mitigation measures to address neighborhood traffic impacts during construction.

## **Transit**

Coordination with King County Metro and Community Transit will be ongoing throughout the construction period to minimize impacts to transit service. Bus zone relocation or closure will be clearly signed and communicated to transit riders. Temporary stops will be provided in a safe and accessible location, free of conflicts from other traffic and construction activity.

## **Bicycles and Pedestrians**

The following will be considered when developing a traffic control plan for road construction:

- Bicyclists and pedestrians must not be placed into conflict with work site activities because it impedes the work and increases the risk to pedestrian safety.
- Bicyclists and pedestrians must not be put into conflicts with other traffic moving through or around the work area.

- Bicyclists and pedestrians must be provided with a safe and convenient travel way (temporary sidewalk or bike path) that replicates as nearly as possible the qualities of a sidewalk, bikeway, or multipurpose trail.
- Construction flaggers may be provided to facilitate the safe movement of pedestrians and bicyclists through the work zone
- Provide well-marked detour routes for bicycles and pedestrians that enable direct and safe access to destinations.

## **Traffic Control Plan**

Traffic control plans (TCPs) help ensure a safe and efficient construction operation. Formal TCPs for the construction of Aurora Avenue North will be prepared to ensure that adequate traffic control is provided during the construction phases and to help ensure that access through the construction zone and to businesses will be safe.

## **Construction Staging Plan**

Formal construction plans will be prepared to aid in management of traffic during construction. The primary options for construction staging are shift, detour, and half-width construction. Shift or half-width construction options are usually the preferred methods of construction because they allow business access during construction, and minimize the spread of construction impacts throughout the community. The shift option maintains the existing lane configuration of the roadway to maximize roadway capacity and driver comfort during construction. It is possible only when sufficient right-of-way is available. Half-width construction staging is another option that maintains some service along the roadway during construction. With this option, all of the roadway traffic is placed on one half of the roadway while the other half is under construction. The number of traffic lanes is reduced, and business access is more difficult to provide.

Construction detours for this project are not anticipated, however they might be needed if major structural repair of the entire roadway or extensive underground utility relocation is required. Such detours will be considered only if the following conditions apply:

- There is only moderate and tolerable impact on the local economy and services.
- No major controversy is generated by the detour. This includes adverse impacts to neighborhoods.

- Substantial environmental impacts and right-of-way clearance problems are anticipated.
- The cost of maintaining the designated detour route is less than the cost of the half-width construction option.

When detours and lane closures are needed on high-volume multilane highways, they will generally be scheduled to occur during the non-peak daytime and nighttime hours when traffic volumes are at their lowest levels.

Detour routes, when used, will be well signed using only appropriate arterial routes.

The sequence of construction will be planned to minimize the length of construction, to keep traffic flowing, to maximize access to properties, and to allow proper pavement construction.

## **Maintaining Access and Communication**

During the course of construction, access to businesses along Aurora Avenue North will be maintained. Temporary access revisions will be well marked and will provide the most direct access to properties possible. One approach for maintaining access while reconstructing driveways will be to construct one-half driveways to enable access using the other half during curing of concrete.

Signing during construction can be divided into two categories, those that are required to identify the worksite and its related conditions and hazards and those that identify business locations and access points that might be obscured during construction.

Owner/tenants along the corridor will be kept informed of construction schedules, schedule changes, and information detailing construction activities.

## **Neighborhood Traffic Impacts**

The City will undertake a neighborhood traffic safety program along the Aurora Corridor. This program includes collecting baseline count information, monitoring traffic impacts, and mitigating impacts if necessary. The City will monitor traffic impacts on adjacent and parallel streets to Aurora during construction and after construction. The program will also include spillover traffic monitoring during construction, with temporary traffic control measures. The counts will eventually be incorporated into the City traffic count program. If a street has traffic growth resulting from the Aurora Project that is documented to exceed a threshold yet to be established, then physical devices may be installed such as traffic circles, diverters, chicanes, or street closures.

## **Land Use**

The City will comply with all applicable permits and approvals to begin construction of the proposed project.

Property acquired for new right-of-way will be purchased by the City at fair market value in accordance with the *Aurora Avenue North Right-of-Way Policies and Procedures Manual* and in accordance with “Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.”

## **Social**

### **Services**

The City will coordinate with public service providers to locate construction and future access points prior to construction. If access points used during construction become ineffective during construction, then the access points will be revised.

As-built drawings from utilities for use in project design and construction will be obtained.

The City will coordinate with police, fire, ambulance services, and school bus services to keep them apprised of construction activities and detour routes. Provisions for emergency vehicle access through the project area will be maintained throughout all phases of construction.

Improving the fire hydrant spacing on the east and west sides of Aurora Avenue will enhance fire protection for all businesses along the corridor by making it less likely that the fire department will have to lay large-diameter hose lines across Aurora Avenue during emergencies. It will also result in less traffic disruption if this eventually were to occur.

Interruptions to utility services will be minimized by coordinating the relocation of utilities with the contractors’ schedules and by notifying customers in advance of any service interruption. Measures will be taken to ensure that existing pipelines are adequately protected against potential adverse effects of the settling that might result from compaction.

For utility lines that must be rerouted or relocated, the City and the contractors will work with the affected utility company to coordinate the necessary modifications.

### **Pedestrian and Bicyclist Facilities**

Space will be maintained on the nonconstruction side of Aurora Avenue North for pedestrians and bicycles during construction.

Wider sidewalks will minimize conflicts between pedestrians and bicyclists when bicyclists are on the sidewalk.

## **Economics**

Temporary signage will be installed to inform drivers that access to businesses during construction is temporarily changed or restricted and that businesses are open. Notify community through newspaper that businesses are open and identify possible detour routes.

Contractors will be required to submit and receive approval of a construction plan to maintain access for all properties and businesses adjacent to construction activity. Interruptions to businesses will be expected to be minimal.

Property owners will be compensated for the fair market value of property acquired for new right-of-way, in accordance with the *Aurora Avenue North Right-of-Way Policies and Procedures Manual* and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

The City will work with impacted businesses that lose compliant parking spaces to reconfigure the remaining parking area to maximize the number of available parking spaces. Parking lot reconfiguration, where appropriate and necessary, will occur as part of the project. This includes restriping parking areas to maximize the number of parking spaces.

Permanent signage will be installed to direct vehicles to legal u-turn intersections.

## **Air Quality**

Best Management Practices for Fugitive Dust control will be used as outlined in the Association of General Contractor's Fugitive Dust Handbook.

The following mitigation will be implemented:

- Water spray will be used as necessary to prevent visible dust emissions, particularly during demolition of brick or concrete structures by mechanical or explosive methods.
- Dust emissions will be prevented during transport of fill material or topsoil by covering the load, either by wetting down the load or by ensuring adequate freeboard on trucks.
- Spills of transported material on public roads will be promptly cleaned up by frequently using a street-sweeper machine.
- Loads of hot asphalt will be covered to minimize odors.



- Work tasks will be scheduled to minimize disruption of the existing vehicle traffic on streets in the vicinity of the station sites.
- All construction machinery engines will be kept in good mechanical condition to minimize exhaust emissions.

## Noise

Construction hours will be limited to the hours allowed by the City's noise ordinance. Construction noise will be reduced with properly sized and maintained mufflers, engine-intake silencers, and engine enclosures, and by turning off idle equipment.

Stationary equipment will be placed as far away from sensitive receptor locations as possible. Where this is infeasible, or where noise impacts are still substantial, portable noise barriers will be placed around the equipment with the opening directed away from the sensitive receptor property.

Although back-up alarms are exempt from the Washington noise ordinance, they are among the most annoying sounds from a construction site. Where feasible, equipment operators will drive forward rather than backward to minimize this noise. Requiring operators to lift rather than drag materials wherever feasible will also reduce the noise generated from material handling.

If construction must occur at night to avoid conflicts with traffic on Aurora Avenue North then a noise variance will be obtained from the City of Shoreline.

## Water Quality/Surface Water

The project will include the following stormwater and erosion control measures. The City of Shoreline has decided to use the most conservative criteria for designing stormwater detention and flow control facilities. Because these measures are included in the project, additional mitigation measures for stormwater and/or erosion and sedimentation impacts are not necessary. Measures to reduce the potential for erosion and downstream sedimentation will include the following:

**Nonstructural measures**—Developing and implementing an erosion and sediment control plan; minimizing soil-disturbing activities during the winter wet season; minimizing disturbed areas by clearly marking clearing and grubbing limits; limiting the amount of area that could be disturbed at any one time; maintaining the erosion and sediment control measures, minimizing the transport of sediment onto paved roads; and sweeping paved roads that have sediment deposited on them from construction activities.

**Temporary structural measures** —Installing temporary silt fences; using catch basin filters; and placing erosion control blankets on steep slopes.

**Permanent measures** —Placing erosion protection around pipe inlets and outlets (e.g., riprap or concrete headwalls); and planting the pervious areas.

Stormwater flow control and quality treatment measures will include the following:

- Stormwater quality treatment facilities in each of the three basins— These facilities will be designed to treat the runoff from as much as possible of the pollutant-generating surfaces in the project area in the basin. The stormwater quality treatment facilities will be designed to meet the basic level of treatment required by the King County’s *Surface Water Design Manual* (SWDM).
- Stormwater detention facilities in the Boeing Creek basin —No stormwater detention facilities will be included for this basin, unless the net new impervious area that will be created by the proposed action in the basin increases to or exceeds 1,500 square feet. The stormwater detention facilities will be designed based on the requirements in Washington State Department of Ecology’s 2001 *Stormwater Management Manual for Western Washington* (SMMWW), i.e. the flow duration standard from the SMMWW with release rates estimated based on forested conditions.
- Stormwater detention facilities in the Thornton Creek Basin —These facilities will be designed for the stormwater runoff from the net new impervious area. These stormwater detention facilities will also be designed based on the requirements in the SMMWW, i.e. the flow duration standard from the SMMWW with release rates estimated based on forested conditions.
- Stormwater detention facilities in the West Lake Washington (Densmore) basin—These facilities will be designed for stormwater runoff from all the project area that is in the West Lake Washington (Densmore) basin following City of Seattle standards.
- Special oil-control facilities at the two high-use intersections (North 145th Street and North 155th Street).

No additional mitigation measures for erosion/sediment control and stormwater impacts will be used. As part of the city-wide stormwater master planning effort, the City may implement additional stormwater control measures under other projects in order to improve the conditions of the streams in the City.

## **Wildlife, Fisheries, and Vegetation**

Because stormwater detention facilities, stormwater water quality treatment facilities, and erosion and sediment control best management practices (BMPs) will be included in the project, potential impacts to fisheries will be minimized and mitigation measures for fisheries impacts

will not be necessary. No mitigation measures for impacts to wildlife or vegetation are necessary.

## Historic and Archaeological Resources

If previously undiscovered archaeological remains are encountered during construction activities, appropriate mitigation measures will be followed to ensure their identification, evaluation, and disposition. If prehistoric archaeological sites are detected during construction, work will be halted in the immediate vicinity of the find.

The Washington State Department of Transportation (WSDOT) has established operational procedures to deal with discoveries of bones during construction. If any bones are encountered, the WSDOT procedures will be followed.

## Visual Quality

Mitigation is required only for light and glare impacts that could occur during construction. Light and glare impacts will be mitigated by shielding roadway lighting to ensure that light sources are not directly visible from residential areas and local streets. Furthermore, construction adjacent to residential areas will be subject to noise regulations, which are designed to minimize nighttime disturbance.

## Hazardous Materials

Mitigation measures for identified potential impacts will include the following:

- Acquire additional information regarding the nature and extent of contamination at the identified sites (including depth to groundwater) and the site cleanup status. This information can be obtained through a request to research Ecology site files.
- Conduct Initial Site Assessments (ISAs) or transaction screening evaluations for sites located within or adjacent to the project right-of-way. It is recommended that the ISAs include review of historical tax records located in the Puget Sound Archives to assist in identifying former site uses and to assist in locating possible unregistered USTs. If the information available is not sufficient to establish that the cleanup is complete or is not sufficient to prepare a remediation plan and cost estimate, a Preliminary Site Investigation (PSI) may be required. Findings should also be used to help manage liability during right-of-way acquisition.
- Locate USTs and fuel lines prior to construction (i.e., at the Chevron, U-Haul, Unocal 76, Texaco locations).

- Determine the presence or absence of PCBs in transformers that will be removed during relocation of overhead electrical utilities. Identified PCBs will require management in accordance with applicable regulations.
- If necessary, schedule construction activities in concert with any needed cleanup activities to avoid contaminated areas. Implement construction techniques that minimize disturbance to the subsurface and prevent the transport of possible contaminants to uncontaminated areas. These techniques will address dewatering activities, site grading and excavation, installation of light standards, stormwater pollution prevention, and spill prevention.
- Prepare a comprehensive Contingency and Hazardous Substance Management Plan and a worker Health and Safety Plan to minimize the effects of identified and unanticipated hazardous substance impacts from contaminated soil and groundwater.

ATTACHMENT 5

# **Public Hearing and Written Comments and Responses**

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## ATTACHMENT 5 PUBLIC HEARING AND WRITTEN COMMENTS AND RESPONSES

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This attachment includes all comments received during the legal comment period, including those made at the Environmental Hearing, for the Environmental Assessment and Draft Environmental Impact Statement on the Aurora Avenue North Multimodal Corridor Project: North 145<sup>th</sup> Street to North 165<sup>th</sup> Street, and the responses to those comments. This attachment also includes comments received following the close of the comment period, on August 16, 2002, and the responses to those comments.

Attachment 5 contains the following attachments:

- 5-1 Comment Letter Log Sheet
- 5-2 Index of Comments and Responses by Name
- 5-3 Responses to Comments
- 5-4 Environmental Hearing Transcript and Comment Letters

These instructions describe how to use Attachment 5. Over 60 people and organizations submitted comments to the City. Nearly 1,000 individual comments were made. For efficiency and paper-reduction purposes, a response may respond to more than one comment because of similarities among those comments. All of the comments, whether they originated from a letter, e-mail, form or the public hearing transcript, are located in Attachment 5-4, Environmental Hearing Transcript and Comment Letters.

### Finding a Response to a Comment

To find a response to a comment, note the comment number indicated in the margin next to the comment in the letter/transcript/form. (To identify which comment numbers are associated with your letter, refer to Attachment 5-1, Comment Letter Log Sheet.) Find the comment number in Attachment 5-2, Index of Comments and Responses, to determine the Response ID associated with the comment and the page number where the response can be found. The comment numbers from the hearing transcript appear in the index first and are followed by those for the comment letters received during and after the comment period. The comment numbers are presented sequentially but are divided by the name of the person who provided the associated comment. When you have identified the Response ID that corresponds to the comment of interest, the response text can be found in Attachment 5-3, Responses, on the page shown in the index.

ATTACHMENT 5-1

## **Comment Letter Log Sheet**

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Comment Letter Log Sheet for Comments During Comment Period								
Log #	Last Name	First	Address	Unit	City	Zip	Rec	Assoc / Info
T	Public Hearing Testimony for Environmental Assessment and Draft Environmental Impact Statement							
1	Botham	Virginia	16334 Linden Ave N		Shoreline	98133	07/16/2002	
2	Montgomery	Phillip J.	17505 Linden Ave N		Shoreline	98133	07/18/2002	Ronald Wastewater District
3	Alexander	James E.	17616 Evanston Ave N		Shoreline	98133	07/31/2002	
4	Miller	M. Michael and Patricia J.	2345 N 149 <sup>th</sup> St		Shoreline	98133	08/02/2002	
5	Aubrey	Jack	16124 Midvale Ave N		Shoreline	98133	08/06/2002	
6	Helferty	Maryann	312 N 160 <sup>th</sup> Pl		Shoreline	98133	08/06/2002	
7	Granger	Sally	16804 16 <sup>th</sup> Ave NE		Shoreline	98155	08/06/2002	
8	Wheaton	Larry	15030 Aurora Ave N		Shoreline	98133	08/06/2002	
9	Riedinger	Marcie	19023 Wallingford Ave N		Shoreline	98133	08/06/2002	
10	Kerr	Celia M.	1300 N 167 <sup>th</sup> St		Shoreline	98133	08/06/2002	
11	Nelson	Les	15340 Stone Ave N		Shoreline	98133	08/06/2002	
12	Maddy	Tom	15205 Aurora Ave N		Shoreline	98133	08/06/2002	
13	Shea	Jim	16309 Interlake Ave N		Shoreline	98133	08/06/2002	
14	Nelson	Les	15340 Stone Ave N		Shoreline	98133	08/06/2002	
15	Way	Janet	940 NE 147 <sup>th</sup> St		Shoreline	98155	08/06/2002	Thornton Creek Legal Def Fund
16	Botham	Virginia	16334 Linden Ave N		Shoreline	98133	08/06/2002	
17	Swenson	Kellie	2308 N 149 <sup>th</sup> St		Shoreline	98133	08/09/2002	
18	Maddy	Tom	15205 Aurora Ave N		Shoreline	98133	08/12/2002	
19	Cottingham	Keith B.	350 NW 175 <sup>th</sup> St		Shoreline	98177	08/12/2002	



<b>Comment Letter Log Sheet for Comments During Comment Period</b>								
<b>Log #</b>	<b>Last Name</b>	<b>First</b>	<b>Address</b>	<b>Unit</b>	<b>City</b>	<b>Zip</b>	<b>Rec</b>	<b>Assoc / Info</b>
20	Cottingham	Diane	350 NW 175 <sup>th</sup> St		Shoreline	98177	08/12/2002	
21	Sonsini	Aubrey L.	1562 NE 177 <sup>th</sup> St	#206	Shoreline	98155	08/12/2002	
22	O'Neil	Harley D.	17844 8 <sup>th</sup> Ave NW		Shoreline	98177	08/12/2002	
23	Noffsinger	Jerilee	17920 Stone Ave N		Shoreline	98133	08/12/2002	CarePlus Medical Center
24	Sup	Han Won	1616 NW 185 <sup>th</sup> St		Shoreline	98177	08/12/2002	
25	Mann	Daniel A.	17920 Stone Ave N		Shoreline	98133	08/12/2002	
26	Lacy	Barbara B.	19275 Stone Ave N		Shoreline	98133	08/13/2002	
27	Ferrell	Randy	17510 Aurora Ave N		Shoreline	98133	08/13/2002	Ferrell-Penning, Inc.
28	Tenin	Caryn	700 N 160 <sup>th</sup> St	A103	Shoreline	98133	08/14/2002	
29	Fleischman	Dick	917 N 130 <sup>th</sup> St		Seattle	98133	08/14/2002	Fleischman Properties
30	Gust	Paulette	14805 Whitman Ave N	#10	Shoreline	98133	08/14/2002	
31	Scheunemann	Art	1301 Fifth Ave	#2400	Seattle	98101	08/15/2002	Economic Dev Council
32	Olson	Greg	18560 1 <sup>st</sup> Ave NE		Shoreline	98155	08/15/2002	Shoreline Chamber
33	Wright	Dale	18546 Burke Ave N		Shoreline	98133	08/15/2002	
34	Garneau	E.J. & Faye M.	951 N 100 <sup>th</sup> St.		Seattle	98133	08/15/2002	Garneau Properties
35	Crunican	Grace	600 4 <sup>th</sup> Ave	Rm 410	Seattle	98104	08/15/2002	City of Seattle - Transp
36	Ryu	Cody & Cindy	15215 Aurora Ave N		Shoreline	98133	08/15/2002	
37	Newman	Claudia M.	1424 Fourth Ave	#1015	Seattle	98101	08/15/2002	Bricklin Newman Dold, LLP
38	Cottingham	Kenneth E.	350 NW 175 <sup>th</sup> St		Seattle	98177	08/15/2002	Cottingham Transp Engineering
39	Day	Roger W. & Heidi A.	1035 NW 166 <sup>th</sup> St		Shoreline	98177	08/15/2002	

Comment Letter Log Sheet for Comments During Comment Period								
Log #	Last Name	First	Address	Unit	City	Zip	Rec	Assoc / Info
40	Smith	J.B.	1016 N 175 <sup>th</sup> St		Shoreline	98133	08/15/2002	Shoreline Fire Department
41	Sola	Richard E.	2315 NW 197 <sup>th</sup> St		Shoreline	98177	08/16/2002	
42	Greeley	Ron	20233 23 <sup>rd</sup> Ave NW		Shoreline	98177	08/16/2002	
43	Monroe	W.G.	19240 10 <sup>th</sup> Ave NE		Shoreline	98155	08/16/2002	
44	O'Neil	Kathy	18405 Aurora Ave N		Shoreline	98133	08/16/2002	
45	Hoverson	Randy & Sue	738 N 200 <sup>th</sup> St		Shoreline	98177	08/16/2002	
46	Hozjan	Lori	17844 8 <sup>th</sup> Ave NW		Shoreline	98177	08/16/2002	
47	Johnson	Ruth	1404 NW Richmond Bch Rd	#28	Shoreline	98177	08/16/2002	
48	Gradwohl	Traci	1408 NW Richmond Bch Rd	#26	Shoreline	98177	08/16/2002	
49	Williams	Julie	2445 NW 197 <sup>th</sup> St		Shoreline	98177	08/16/2002	
50	Doennebrink	Brian	20330 Burke Ave N		Shoreline	98133	08/16/2002	
51	Crisafulli	Jeff	15540 32 <sup>nd</sup> Ave NE		Shoreline	98155	08/16/2002	
52	Phillips, DVM	Myron G.	18019 Aurora Ave N		Shoreline	98133	08/16/2002	Shoreline Merchants Assn
53	Edmundson	C.D.	19275 Stone Ave N		Shoreline	98133	08/16/2002	
54	O'Neil	Lacey	19840 8 <sup>th</sup> Ave NW		Shoreline	98177	08/16/2002	
55	Crawford	Patty			Shoreline		08/16/2002	Shoreline Merchants Assn
56	Stephens	Diana L.	18005 Aurora Ave N		Shoreline	98133	08/16/2002	Highland Ice Arena
57	Walsh	Rick	201 S Jackson St		Seattle	98104	08/16/2002	King County Metro
58	Way	Janet	940 NE 147 <sup>th</sup> St		Shoreline	98155	08/16/2002	Thornton Creek Legal Def Fund
59	Daher	George A.	20001 Aurora Ave N		Shoreline	98133	08/16/2002	

Comment Letter Log Sheet for Comments During Comment Period								
Log #	Last Name	First	Address	Unit	City	Zip	Rec	Assoc / Info
59	Noffsinger	Jerilee	14731 Aurora Ave N		Shoreline	98133	08/16/2002	
60	Meyer	Kenneth W.	1509 N 143 <sup>rd</sup> St		Seattle	98133	08/16/2002	
61	Elster	Clark	1720 NE 177 <sup>th</sup> St		Shoreline	98155	08/16/2002	
62	McCurdy	Russell J.	17532 Aurora Ave N		Shoreline	98133	08/16/2002	
63	Stephens	Diana L.					08/16/2002	Binder submitted
64	Reeve	Kevin S.	17225 Aurora Ave N		Shoreline	98133	08/16/2002	Binder submitted
64a	Cottingham	Kenneth E.	350 NW 175 <sup>th</sup> St		Shoreline	98177	08/16/2002	Duplicate of Letter #38
64b	Ferrell	Randy					08/16/2002	Duplicate of Letter #27
64c	Hagen	Walt	711 N 193 <sup>rd</sup> St		Shoreline	98133	08/16/2002	
64d	Mann	Daniel A.	17920 Stone Ave N		Shoreline	98133	08/16/2002	Duplicate of Letter #25
64e	Olson	Greg	18560 1 <sup>st</sup> Ave NE		Shoreline	98155	08/16/2002	Duplicate of Letter #32
64f	Crawford	Patty					08/16/2002	Duplicate of Letter #55
64g	Kim	Moses	14817 Aurora Ave N		Shoreline	98133	08/16/2002	Four Seasons Restaurant
64h	Yang	Jung S.	14703 Aurora Ave N		Shoreline	98133	08/16/2002	Debon Cosmetics
64i	Yi	Chong B	6935 Delridge Way S		Seattle	98106	08/16/2002	
64j	Kim	David	15200 Aurora Ave N	Suite B	Shoreline	98133	08/16/2002	Kim's Photo Studio
64k	Oh	Byung Soon	15202 Aurora Ave N		Shoreline	98133	08/16/2002	Aurora Oriental Market
64l	Hwang	David S.	15210 Aurora Ave N		Shoreline	98133	08/16/2002	Royal Bakery
64m	Kim	Kyung S.	15200 Aurora Ave N		Shoreline	98133	08/16/2002	Old Village Korean Restaurant
64n	Kim	Yong Hwa & Connie	15001 Aurora Ave N		Shoreline	98133	08/16/2002	Lotte Gifts Shop

<b>Comment Letter Log Sheet for Comments During Comment Period</b>								
<b>Log #</b>	<b>Last Name</b>	<b>First</b>	<b>Address</b>	<b>Unit</b>	<b>City</b>	<b>Zip</b>	<b>Rec</b>	<b>Assoc / Info</b>
64o	Yi	Tae H.	15033 Aurora Ave N		Shoreline	98133	08/16/2002	Yedang Furniture
64p	Jeong	Jong S.	15017 Aurora Ave N		Shoreline	98133	08/16/2002	Hana Travel Agency
64q	Lee	Johnny S. DDS	15013 Aurora Ave N		Shoreline	98133	08/16/2002	Johnny S. Lee, DDS
64r	Chang	Myung-Ae					08/16/2002	Quest Inn
64s	Reed	Ok Yon	15200 Aurora Ave N		Shoreline	98133	08/16/2002	Mom's Teriyaki
64t	Holz	Thomas W.	677 Woodland Sq Lp SE		Lacey	98509	08/16/2002	SCA Consulting Group

<b>Comment Letter Log Sheet for Post-Comment Period Comments</b>						
<b>Log #</b>	<b>Last Name</b>	<b>First</b>	<b>Address</b>	<b>City</b>	<b>Zip</b>	<b>Rec</b>
A-1	Sanagustin	Lindsay	19829 8 <sup>th</sup> Ave	Shoreline	98177	08/20/2002
A-2	Walsh	Rick	201 S Jackson St	Seattle	98104	08/20/2002
A-3	Ricker	Ronald F.	1519 NE 177 <sup>th</sup> St	Shoreline	98155	08/23/2002
A-4	Kroum	Crystal	email: earthday1992@juno.com			08/26/2002
A-5	Kertson	Lisa	email: lisakertson@msn.com			09/04/2002
A-6	Williamson	Warren J.	email: warren.j.williamson@boeing.com			12/02/2002
A-7	Williams	Jan	email: vonwilliams@attbi.com			12/07/2002
A-8	Bear	Bill	email: flyingbear@attbi.com			12/09/2002
A-9	Guthrie	Barbara	email: k.romdall@worldnet.att.net			12/09/2002
A-10	Anonymous		email: Towerroc@cs.com			12/09/2002
A-11	Green	Gary & Terry	email: hia@cmc.net			12/09/2002

<b>Comment Letter Log Sheet for Post-Comment Period Comments</b>						
<b>Log #</b>	<b>Last Name</b>	<b>First</b>	<b>Address</b>	<b>City</b>	<b>Zip</b>	<b>Rec</b>
A-12	Botham	Ginger	email: botham@serv.net			12/09/2002
A-13	Mehus	Gordon	email: baadhmehus@seanet.com			12/09/2002
A-14	Waun	Doug	email: info@theprime.com			12/09/2002
A-15	Cottingham	Kenneth E.	350 NW 175 <sup>th</sup> St	Shoreline	98177	12/20/2002
A-16	Phillips	Myron G.	unclemy@msn.com			04/23/03
A-17	Stephens	Diana				05/15/03
A-18	Phillips	Myron G.	unclemy@msn.com			07/03/03

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ATTACHMENT 5-3

## Responses to Comments

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**AURORA AVENUE NORTH  
145th to 165th Project**

**Responses to Comments on EA**

# Responses to Comments

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**Response ID: 1      Narrower sidewalks needed*****Responds to Comments: 1-1, 61-77, 63-100, A-14-1***

Under current conditions, pedestrians are forced to walk along the shoulder of the roadway where it exists with nothing separating them from traffic. This project has features that would provide a connected, continuous, safe, and pleasant environment for pedestrians. Only a small amount of additional right-of-way is necessary for these improvements.

Aurora Avenue through Shoreline is designated as a National Highway System (NHS) route. Therefore, the minimum sidewalk width required is 6 feet. In accordance with RCW 47.24.020(2), "The city or town shall exercise full responsibility for and control over any such street beyond the curbs..." The Americans with Disabilities Act (ADA) recommends a minimum width for the proposed sidewalks of 6 feet, per the WSDOT Pedestrian Facilities Guidebook (1997). This allows direct routes of travel so that pedestrians don't have to change their direction of travel to avoid "street furniture" obstacles such as fire hydrants and utility poles. At the discretion of the City, the proposed action features a 7-foot-wide sidewalk to strike a balance between pedestrian safety and pleasurable walking experience and creation of an environmental friendly facility. When considering what is "environmentally friendly", a balance occurs between additional impervious pavement, safety for the sidewalk user and the visual quality experienced by the user. In addition, the overall roadway section of the Proposed Action, along with mitigation measures, will result in cleaner stormwater leaving the project area.

The City has committed to reducing the sidewalk/amenity zone width along portions of frontage where buildings lie within the proposed right-of-way. This would occur in the Proposed Action at the Hideaway Card Tavern and Seattle Ski Shop. The Shoreline Municipal Code includes a provision to reduce the front yard setback to zero feet if the right-of-way line is established for a street. Also, the statement referred to by comment 61-77 says that "Because a 7-foot-wide sidewalk is inconsistent with the City of Shoreline Development Code, a deviation from the code would be applied for if this alternative is constructed." This is not a prohibition against 7-foot sidewalks; it is just a statement that a deviation from the Shoreline Development Code would be needed for a sidewalk of this width.

The Interurban Trail is intended to provide regional mobility for bicycles and pedestrians and not necessarily to access businesses along Aurora Avenue North. The Interurban Trail runs diagonal to Aurora and is more than 650' away at North 145th Street. It is intended to provide regional mobility for bicycles and pedestrians while sidewalks along Aurora Avenue would give direct access to local businesses and to transit service.

The funding sources include City Roads Capital Fund, WSDOT, Transportation Improvement Board, Surface Transportation Program, Pedestrian Facilities Program, Federal Highway Administration, and Metro King County. In most cases the grants for this

project were written based on the concept resulting from the Predesign Study (which can be viewed at the Shoreline City Clerk's office) and CATF recommendations. This money cannot be spent directly on cleaning up the city, putting up more signs, or increasing community awareness of pedestrians outside of the context of this project.

**Response ID: 2      BAT lanes**

***Responds to Comment: 1-2***

The Pedestrian Safety Project at the North 165th and North 170th Street intersections with Aurora Avenue North required the elimination of the roadway shoulder (that was sometimes used as a bus pull-out area) and the two-way-left-turn lane in order to provide appropriate pedestrian landings and median refuge areas. This project is an interim set of improvements designed to reduce pedestrian-vehicle accidents while recognizing that broader corridor improvements were planned for the near term. The Pedestrian Safety Project has independent utility from the proposed action so it would have been constructed even if the Proposed Action was not under consideration. Having buses stop in the travel lanes of SR 99 was preferred over not providing increased safe pedestrian safety. As such, the Pedestrian Safety Project did not include funding for additional right-of-way and roadway improvements that would be necessary to preserve the bus pull-outs. Once the Proposed Action is built, buses will be able to stop in the BAT lane, out of the way of general purpose traffic.

**Response ID: 3      Parking Impacts**

***Responds to Comments: 1-3, 23-3, 25-3, 29-5, 50-24, 61-23, 61-28, 61-35***

Despite the lengthy history of use, most of the existing parking areas along the shoulders of Aurora Avenue are non-compliant spaces according to City code and are within or partially within the public right-of-way. This type of uncontrolled shoulder parking endangers both vehicles and pedestrians. Currently 9 of the 86 businesses along Aurora have one or more non-compliant parking stalls that use the Aurora Avenue right-of-way. These non-compliant stalls that will be lost typically represent a small percentage of the total business parking available (see Tables 3-20 and 3-22 in the EA/DEIS or Table 5 in the FONSI). Although property owners would not be paid for parking stall losses in or partially in right-of-way, business parking areas may be reconfigured with the assistance of the City in order to mitigate displaced stalls. At properties where parking is affected, more than adequate parking remains for businesses to meet building code requirements. Therefore it is not anticipated that any business will close due to loss of parking. No additional parcels would need to be purchased for the purposes of providing public parking locations. See Chapter 3, Economics in the EA/DEIS for a description of parking impacts.

**Response ID: 4      U-turns**

***Responds to Comments: 1-4, 38-50***

Many of the u-turn opportunities would be provided at locations with traffic signals. A separate signal phase would enable comfortable and safe left-turn and u-turn maneuvers. The medians with left-/u-turn lanes are proposed because the current conditions with a two-way left-turn lane combined with high traffic volumes (+/- 40,000 vehicles per day), high number of driveways and 40 mile per hour traffic speeds make traffic operations and uncontrolled left-turns unsafe. In addition to managing median access points, formal

driveway designs would be developed as an additional safety measure. In accordance with WSDOT Design Manual (Figure 910-17), the u-turn radii would be 26 feet (52 feet outside-to-outside diameter) which would allow u-turns by passenger vehicles and small trucks, sports utility vehicles, and vans.

The mid-block left-turns are designed to accommodate large trucks (wheel base of 55 feet long, WB-55), however the u-turns are not designed to accommodate large trucks. Since trucks of this size would not be able to make a u-turn within the project limits, they would need to use the I-5 exit that put them in the appropriate direction to make a right turn into their destination. Trucks accessing Aurora Avenue North from I-5 would be able to position for right-in/right-out access by using North 175th Street interchange to access properties on the western side of the roadway and the North 145th Street interchange to access properties on the eastern side.

The appropriate design vehicle for each turning movement is determined by the use and classification of the location. For turning onto residential side streets where there is little commercial vehicle traffic, it is appropriate to select a passenger vehicle for the design vehicle. For intersections with major freight routes, it is appropriate to select a large truck (WB-67) for the design vehicle. The mid-block U-turns are designed to accommodate passenger vehicles which makes up about 97 percent of the Aurora Avenue vehicular traffic.

#### **Response ID: 5          Level of service calculations**

##### ***Responds to Comments: 1-5, 38-4, 38-46, 38-48, 61-65, 61-68, 61-79, 61-85, 64-54***

The averaging of Level Of Service (LOS) calculations referred to from the City's Comprehensive Plan covered Aurora Avenue from North 145th to North 205th Street. That data also averaged intersections east and west of Aurora Avenue.

Intersection Level of Service measurements for signalized intersections are intended to evaluate the overall service provided at an intersection. So this measure not only evaluates service for vehicles on through-lanes along Aurora Avenue, but also lanes approaching Aurora Avenue from side streets. Level of Service measurements for unsignalized intersections evaluate service provided by the stop-controlled approaches at the intersection (in the case of Aurora Avenue, the minor side street approaches). Reasonable and safe access onto Aurora Avenue is important because side streets provide access from adjacent businesses and neighborhoods.

The LOS data presented in Table 1 of the FONSI show results for both signalized and unsignalized intersections. The LOS for the signalized intersections at N. 155<sup>th</sup> Street and N. 160<sup>th</sup> Street are improved for the Proposed Action in comparison to the No Action Alternative (28 second delay versus 47 second delay at 160<sup>th</sup> Street). The LOS at N. 145<sup>th</sup> Street would be worse for the Proposed Action in comparison to the No Action Alternative (127 second delay versus 119 second delay).

As indicated in Table 1 of the FONSI, Footnotes 1 and 2: Unsignalized Intersection - LOS Average for Minor Approaches; the LOS calculations for unsignalized intersections average the delay of minor approaches and do not include major approaches (on Aurora) in the data. The LOS analyses for unsignalized intersections follows the procedures established by the National Academy of Sciences, Transportation Research Board, and Highway Capacity Manual, 2000. The LOS data for the unsignalized intersections are relevant because they

indicate that access from side streets would be poor. Footnote 3 indicates that the "Corridor Average" data do not include the unsignalized intersection data. Footnote 2 for Table 1-2 also notes that the unsignalized data are not included in the "Corridor Average." Two out of the three signalized intersections would operate at LOS F for the No Action Alternative in year 2020.

Right-in/right-out access at the unsignalized intersections would improve the LOS, just as full closure of any intersection would also improve the LOS. However, the project objectives are not to eliminate access to Aurora from side streets. New signalized intersections at N. 152<sup>nd</sup> Street and N. 165<sup>th</sup> Street would enable access from adjacent businesses and neighborhoods onto Aurora. These new signals would also enable protected U-turn movements, and would allow for signalized pedestrian crossings.

**Response ID: 6          Westminster Way**

***Responds to Comments: 1-6, 50-13, 50-27, 64-58***

The Aurora Pre-Design Study recommended closing Westminster Way from about North 155<sup>th</sup> Street to North 158<sup>th</sup> Street. Westminster Way is designated a freight route, and the Pre-Design Study recommended constructing an additional right-turn lane at North 155<sup>th</sup> Street to accommodate trucks turning from Aurora Ave to Westminster Way. The Aurora Avenue 145<sup>th</sup> to 165<sup>th</sup> project is planning to keep Westminster Way open at this time. The southbound connection from Aurora Avenue to Westminster Way is proposed to be reconfigured to allow one lane to turn from Aurora Avenue onto Westminster Way. The radius of this turn will be tighter than the existing turn radius. However, this turn will still be designed to handle large trucks (WB-67). By designing this connection as one lane with a tighter radius, the roadway opening across Westminster Way will become smaller to improve safety and to create a manageable pedestrian crossing at Westminster Way and Aurora Avenue on the west side of the street. The City may at some future time pursue closing this portion of Westminster to some or all traffic. Appropriate public review will be conducted at that time, and future designs will consider freight traffic accommodation.

Access and parking for the Pizza Hut restaurant in this location will be modified due to the Aurora Avenue improvements. Access to the Pizza Hut will still be provided from both Aurora Avenue and Westminster Way. The City is planning to reconfigure the parking lot to provide additional parking within the Westminster right-of-way to compensate for parking impacts from the Aurora Avenue improvements. Pizza Hut will have 5 parking spaces impacted, 4 of which will be replaced through the reconfiguration.

**Response ID: 7          Construction noise at night**

***Responds to Comments: 1-7, 1-14, 16-2, T-66***

In order to minimize impacts to businesses and other users, the City will construct the project as quickly as possible. This will include using the full range of construction hours allowed by the City's noise ordinance. The City does not intend to have construction occur beyond the hours currently allowed by City Code. However, to avoid daytime congestion on Aurora Avenue North, it could be beneficial to conduct some work at night. Working at night would also shorten the duration of construction activities, minimizing inconveniences to drivers and businesses located along the corridor. Should it become necessary to work outside the allowed hours, a noise variance would be required that would specify the kinds



of work that would be allowed at night. The variance process is used to ensure sensitivity to the surrounding neighborhoods. See Response ID 35 for more information.

**Response ID: 8            LOS @ North 160th Street**

***Responds to Comment: 1-8***

The traffic counts that were used for the Year 2000 LOS calculations were all taken during the P.M. peak hour for consistency. That count time is 5:00 P.M. to 6:00 P.M. The counts and analyses are taken at the same time to allow modeling of all of the signals operating as a system. Some of the intersections have higher volumes at other times of the day than the P.M. peak hour. North 160th Street is one of those, which has volumes for some of the movements in the intersection that are higher in the morning than in the evening peak. Therefore, we have conducted traffic counts, and performed LOS calculations at that intersection at other time periods to accommodate traffic movements in the design work being done for the project.

**Response ID: 9            BAT lane usage**

***Responds to Comments: 1-9, 43-6, 60-9, 61-25, 61-60, 64-85***

The proposed Business Access and Transit (BAT) lanes would be used by right-turning traffic to adjacent properties and side streets and by transit vehicles. These lanes would allow safer traffic access at driveways to businesses by allowing vehicles to move out of through-lanes prior to making their right-turns into driveways and side streets. Also, vehicles entering Aurora Avenue can turn into these lanes prior to moving into through lanes. Buses would use these lanes to avoid heavier traffic in the general purpose lanes and also would not hold up traffic while making stops. The BAT lanes would also add capacity at intersections by providing a right-turn lane.

The transit buses using the lanes are owned by King County Metro. The Light Rail Transit project (referred to in Comment 1-9) is owned by Sound Transit, which is a different transit agency. Metro currently has bus headways on Aurora of six (6) minutes or better per bus in the peak direction during peak periods (the peak service periods are approximately two (2) hours each in both the AM and PM peak). Off peak service is currently available every 20 to 30 minutes. Metro plans to upgrade off peak service throughout the day to 15 minutes starting in September 2003.

Metro strongly supports the concept of BAT lanes and proposes to improve (increase) service along Aurora in the future, before and after completion of the project. Aurora is an important transit market. Route 358 is an all-day express route and is an important regional connection which operates along the length of Aurora through Shoreline and Seattle. Route 358 is a relatively new service that was the result of consolidating Routes 359, 360 and 6. This consolidation was accomplished to simplify and expand the quality of transit service in this corridor (it's not "one under utilized local milk-run" as claimed in Comment 61-60). This is one of the most productive routes in the Metro system, carrying approximately 7,000 daily riders, 4,000 of which board and de-board in Shoreline. Note that these ridership data are based upon on-board rider counts (not "computer modal invented counts" as claimed in Comment 61-60). Route 358 consistently ranks in the top five (5) routes in the County in terms of ridership.

Metro has identified the implementation of BRT (Bus Rapid Transit) as a “highest priority” project in their newly adopted 6-Year Transit Service Implementation Plan. The inclusion of BAT lanes in the Aurora project is one of the most important actions the City of Shoreline can take to actively promote increased transit in this corridor. This project is needed to ensure that transit will carry more and more of the increased trips that are forecasted, and for which general purpose roadway capacity will simply not be available.

The "Business Access and Transit Lanes" are not "transit-only lanes." These lanes will provide more benefits than improving transit operations and quality. The outside lanes are for right-turning traffic into and out of driveways to adjacent properties and businesses; for right-turns at side streets, and for buses. These lanes would enable right-turning traffic to make turns into and out of these auxiliary lanes rather than from the "through" lanes, which would be used by higher speed through traffic. Traffic volumes using the BAT lanes will be as high as 300 vehicles per hour at high-traffic locations along Aurora. The lanes for right-turning traffic would reduce "rear-end" accidents as well as many of the "angle" accidents. Allowing buses to use the right-turn lanes helps by removing buses from higher speed through traffic. These outside lanes for Business Access and Transit use would provide 24-hour safety and operational benefits for traffic that makes right-turns into and out of driveways and side streets. These lanes would increase the travel and traffic capacity of Aurora by removing slower traffic from higher speed through lanes. Also, these additional right-turns at intersections provide capacity and improvement to intersection levels of service.

**Response ID: 10      Land Use/Economic Impacts**

***Responds to Comments: 1-10, T-42***

In accordance with FHWA Technical Advisory 6640.8A, land use analyses observe changes in land uses and assess the consistency of a proposed project with adopted plans and policies. Therefore, to determine land use impacts, the EA/DEIS reports the amount of acres that would be converted to public right-of-way in order to construct each alternative (see Chapter 3, Land Use, Environmental Consequences). The types of impacts listed in the comment can be found elsewhere in the EA/DEIS. See Chapter 3, Economics, for a description of business impacts such as sales activity, parking, and tax revenue impacts.

**Response ID: 11      Cumulative impacts – Buildings north of North 165th Street demolished**

***Responds to Comments: 1-11, T-67, T-68, 27-2, 37-8***

The EA/DEIS evaluated direct project impacts as well as cumulative impacts. Direct impacts are those caused by the proposed project from North 145th Street to North 165th Street. Cumulative impacts are those caused by the proposed project as well as other past, present, and reasonably foreseeable projects, which includes Aurora Avenue North from North 165th Street to North 205th Street and the Interurban Trail. The discussion of cumulative impacts includes areas that are not a part of the project area for the proposed project; a cumulative impacts analysis has been conducted for each scoped element of the environment and is included in the FONSI and EA/DEIS. The Aurora Avenue 145th to 165th project would not displace any businesses, however all of the projects considered in the cumulative impacts section combined may result in business displacements given existing design concepts. Table 3-39 in the EA/DEIS shows possible impacts to potentially historic buildings based on the existing pre-preliminary “worst case” design concepts of

other projects. It does not account for design refinements, mitigation measures, and proposed alternatives of other projects which are currently unknown.

The cumulative impacts assessment for Economics in the EA/DEIS (pages 3-62 and 3-63) describes both positive and negative impacts. For example, the Economics cumulative impact analysis indicates that “the overall economic benefits that would likely occur due to the completion of the project from North 145th Street to North 165th Street would also extend to the entire 3-mile corridor under the cumulative scenario.” However, the Economics cumulative impact analysis also indicates that “the future project from North 165th Street to North 205th Street would require the acquisition of additional right-of-way to accommodate the current design. The purchase of the property would impact retail and property tax revenues collected by the City, relocate businesses and their employees, and remove parking from the area.”

The proposed action would displace parking spaces as shown in Table 5. No businesses would be displaced and no buildings would be demolished, partially or in full. Sidewalk widths would be reduced where building conflicts exist. This information is contained within Attachment 3 in the FONSI.

**Response ID: 12      Undergrounding utilities**

***Responds to Comments: 1-12, 50-22***

The City has worked very closely with Seattle City Light to coordinate utility undergrounding on this project. The City expects that Seattle City Light would pay for the undergrounding of utilities for the power distribution system and service connections within the public right-of-way. Property owners are typically expected to pay for service hookups from the right-of-way line to their service box for commercial properties.

Utility hookups between properties and utilities are handled directly between property owners and utility companies. The City’s undergrounding ordinance, No. 82, requires service hookups to be paid by private businesses. Businesses have a right to appeal this payment to the City Council if they feel it should not be required. For the vast majority of utility undergrounding projects, the property owner pays the entire cost for the hookups. For the Aurora Corridor Project, the City is considering paying property owners partial reimbursements for the hookups. Coordination of the hookups to manage potential disruption of service would be accomplished by the property owners and utility companies.

Other overhead utilities such as cable and telecommunication are responsible for their proportionate share of undergrounding costs. It is estimated that the range of total cost for project utility undergrounding is \$2 to \$3.5 million.

**Response ID: 13      Need sign relief**

***Responds to Comments: 1-13, 16-3, T-98, 32-2, 50-34, 61-89, A-12-5***

During construction, extra efforts such as posting “businesses are open” signs, or other signs would be used to communicate to drivers and pedestrians that businesses are open and accessible. The City and contractor would coordinate with the business community on methods or efforts to advertise or communicate that business continues along the corridor. The City would consider “special sign relief” as a temporary measure during the construction process. Shoreline Municipal Code (SMC) requires all new signs meet code

requirements, including those constructed as part of the project. The City's current policy would require that when signs must be relocated, property owners must upgrade the signs to code standards. The City would pay the value of sign relocation and the depreciated value of the existing sign. The City is considering a change to the code for this project as it relates to relocating existing signage to allow grandfathering of existing signs. Rather than require signs that need to be relocated due to a project impact to comply with Shoreline Development Code, the City is considering a policy that will allow existing signs that do not comply with the Development Code to be relocated. As an alternative to grandfathering of existing signs, the City is also considering to set aside funding to assist in replacing signs that do not conform to code. These are two examples of potential sign relief during the construction process. The cost for moving signs will be paid for by the project.

**Response ID: 14      Growth and PSRC**

***Responds to Comment: 1-15***

The GMA establishes a framework for local comprehensive planning, requiring cities to outline goals and policies which will ensure adequate provisions for the additional needs of future populations. Goals and policies within a city's comprehensive plan must be updated to reflect changes occurring within a jurisdiction. These plans do not cause growth but observe past trends and land uses in order to predict future growth. Growth in part is a function of employment and housing availability. The proposed transportation project is in conformance with the City of Shoreline and King County Comprehensive Plans. Cumulative impacts are also addressed in the EA/DEIS.

**Response ID: 15      Sewer lines**

***Responds to Comment: 2-1***

Sewer lines located in the outer edge of the existing right-of-way would likely be located underneath the sidewalk and amenity zone, and would not be subject to vehicular traffic except at driveway locations, similar to current conditions. The vehicular loads on the existing pipes at these locations should actually be reduced with the construction of concrete sidewalks and thickened concrete driveway approaches, and compaction conditions are not expected to be a concern. When existing sewer lines would be located beneath traffic lanes, special precautions would be taken. Your comment is noted and the City will identify locations with expected heavy vehicle traffic and will work with the contractor to ensure proper compaction and protection of existing pipes.

**Response ID: 16      Identify sanitary sewers location**

***Responds to Comment: 2-2***

The text in the Description of the Project Alternatives sections for all of the build alternatives describes the proposed projects and elements of the proposed improvements. Stormwater conveyance and treatment and undergrounding of overhead utilities are work elements of the proposed projects. The City is planning no additional construction of underground utilities as part of the Aurora Avenue 145th to 165th project. The presence of sanitary sewer lines in the project area are referred to among other existing utilities, such as gas, water, broadband, communications, and storm water in the Social section of Chapter 3, under Affected Environment, in the EA/DEIS.

**Response ID: 17      Construction staging input**

***Responds to Comment: 2-3***

The Ronald Wastewater District will be contacted for input on construction staging, particularly in regard to the presence and handling of sewer facilities.

**Response ID: 18      Sewer line locations**

***Responds to Comment: 2-4***

The sewer line location information has been added to the text of the environmental document. This information, along with coordination with the Ronald Wastewater District, will be used during final design to minimize any potential impacts to sewer facilities.

**Response ID: 19      Signals and traffic flow**

***Responds to Comments: 3-1, 34-5, 60-10***

This project would include the addition of signalized intersections at key locations to improve the spacing of signals and to provide additional pedestrian crossing opportunities. The signals along Aurora Avenue would be timed to improve traffic flow. Coordination of these signals can be accomplished to improve the traffic flow, speed, and capacity of this roadway section.

Only two additional signals are proposed: One at N. 152<sup>nd</sup> Street and one at N. 165<sup>th</sup> Street. Three signalized intersections are already in place at N. 145<sup>th</sup> Street, N. 155<sup>th</sup> Street, and N. 160<sup>th</sup> Street. Providing additional signals will shorten the length of roadway that pedestrians must walk to get to a signalized crossing. While it is acknowledged that all jaywalking would not be eliminated with the project improvements, studies such as the "International Boulevard Sidewalk Impact Study" conducted by the Center for Applied Research indicate that the frequency of jaywalking would be reduced when safe crossing locations are provided.

The effect of the two- (2) additional signals has been evaluated and the results are presented in Table 1 in the FONSI. The findings are that the overall traffic operations would be improved in comparison to No Action. Very little delay to traffic would be experienced at the two- (2) new signalized intersections (less than an average of 20 seconds during the PM peak hour in Year 2020). This evaluation of traffic operations takes into account the inter-relationship between the signals in the project. The overall traffic and delays and potential for air pollution would be less than the No Action Alternative.

The City proposes immediate and continuous implementation of its Neighborhood Traffic Safety Program for neighborhood streets adjacent to Aurora Avenue. The City has initiated conducting traffic counts and traffic speed measurements on adjacent streets. During construction and after the project is completed, the City would monitor traffic conditions on neighborhood streets. If traffic conditions on the neighborhood streets warrant action, the City would work with neighborhoods to implement neighborhood traffic and control measures.

**Response ID: 20      Business Relocation**

***Responds to Comments: 3-2, 64n-1***

No businesses would be directly displaced as a part of this project; see the Economics section of Chapter 3 in the EA/ DEIS or Attachment 3 of the FONSI. Therefore, great distances between buildings are not expected. The perceived lack of pedestrians along Aurora Avenue is partially due to the dangerous and uncomfortable pedestrian environment. In most areas pedestrians must walk on the shoulder of the roadway close to traffic with spotty and insufficient illumination. Under current conditions, pedestrians are forced to walk along the shoulder of the roadway with nothing separating them from traffic. This project includes sidewalks that are ADA accessible and can accommodate bus stops, public benches, and light poles.

**Response ID: 21      Median and lane alignment**

***Responds to Comment: 3-3***

Although the width of the planted median would vary, this is only to make room for left- and u-turn pockets. The other northbound and southbound lanes would remain generally straight regardless of the width of the planted median.

**Response ID: 22      Old Country Buffet**

***Responds to Comment: 3-4***

The Old Country Buffet is outside the project limits of this project. This business is within the anticipated project area for the Aurora Avenue 165-205 Project, which has not yet developed detailed project alternatives. Any impacts resulting from the Aurora Avenue North 165-205 Project will be fully documented in its own environmental process.

**Response ID: 23      Why Public Comments Now?**

***Responds to Comment: 3-5***

An Environmental Assessment prepared under the National Environmental Policy Act (NEPA) requires the project proponent to offer the opportunity for a public hearing, and if there is any request to hold one, a hearing will be required. The FHWA asked the City of Shoreline to hold a hearing, and therefore a hearing was conducted. Comments from this public hearing have been recorded, addressed, the City of Shoreline and the Federal Highway Administration have agreed and incorporated into the NEPA document. A 30-day comment period is required for both a NEPA EA and a SEPA EIS. Comments received during this environmental process have been considered during the design of the project.

**Response ID: 24      Cost**

***Responds to Comments: 4-1, 19-2, 20-2, 63-1, 63-6, 64-44, 64j-3***

The City believes that the investments proposed for the project are very important and worthwhile and meet the purpose and needs identified in the EA/DEIS (pages 1-1 through 1-7). Aurora Avenue is a regional transportation corridor which currently carries approximately 40,000 vehicles per day. Aurora Avenue is also a major transit facility. Aurora Avenue has many retail and commercial businesses abutting the roadway. The project must satisfy many objectives beyond moving automobiles, including improving traffic safety, lighting, transit mobility, improving the visual image along Aurora Avenue and encouraging economic redevelopment. Thus, the proposed project addresses more than

a single issue, such as safety, and has more than one design element, such as a raised median.

At the time the EA/DEIS was circulating for review the City Council had not selected a preferred alternative. On December 9, 2002, the Shoreline City Council adopted Resolution No. 201, which selected Alternative A Modified as the design for the project. Based on this design, the current cost estimate for the project is \$19.6 million. This cost estimate is a 30-percent design level estimate, which includes a substantial factor for contingency, uncertainty and risk. There is federal, state, and King County money, as well as local City of Shoreline dollars, being used to cover the cost of the project.

A value engineering (VE) study was performed on the project to evaluate possible engineering solutions and cost-cutting measures. The recommendations of the study have been considered and some will be implemented by the City such as using drought tolerant plants in the landscaping, consolidating light fixtures to save cost, abandoning existing storm pipes in place, and minimizing utility trenching costs by putting main distribution lines down one side of the street. Other VE proposals have not been accepted for various reasons (see Response ID 75). As a result, only some of the cost recommendations presented in the VE study are applicable.

**Response ID: 25      Improvements by property owners**

***Responds to Comment: 4-2***

The City Council has stated that it will seek to fund this project from grants as much as is possible. The Council has not indicated a desire to assess property owners on Aurora Avenue for improvements. The City does, however, generally require improvements as part of redevelopment.

The primary need for the project is vehicular and pedestrian safety. Roadway improvements that would improve safety, such as the median, are outside of the scope of what can be provided by adjacent property owners.

The Aurora Avenue 145th to 165th project would improve the visual appearance of properties and businesses by constructing curb, gutter, planted amenity zone, and sidewalks. The landscaping in the median and amenity zone would provide a more consistent, visual improvement. Also, street lighting and undergrounding of utilities would dramatically improve the appearance of the project area. These enhancements may encourage business owners to make efforts to improve the appearance of their property frontages. The project would improve access to the businesses with formal driveway aprons and through the addition of a business access transit lane. However, the visual improvements and business access improvements are only a small part of the project objective and benefits. The project would also improve traffic capacity and operations; provide traffic safety improvements; transit speed and reliability improves; and pedestrian access and safety improvements.

**Response ID: 26      Construction and diverted traffic**

***Responds to Comment: 5-1, 63-67***

Traffic would be able to use Aurora Avenue during construction, however, it is likely that some traffic would use parallel north-south arterials. After construction, drivers would be

more likely to use the roadway that provides greater mobility – Aurora Avenue North. During operation, little traffic diversion is expected on streets parallel to Aurora Avenue North. Table 2 in the FONSI shows that Dayton Avenue and Meridian Avenue would see a reduction of 5 to 10 trips in both southbound and northbound directions in the p.m. peak hour in the year 2020. This traffic shows up on the improved Aurora Avenue North section, which gains 30 trips in the southbound direction and 40 trips (p.m. peak hour) in the northbound direction in year 2020.

The Transportation mitigation section in the EA/DEIS (pages 3-21 through 3-23), as well as pages 4-1 through 4-3 of the FONSI, include a description of mitigation measures to be taken to minimize traffic impacts during construction. The City has proposed a very deliberate program to maintain traffic flow and access along Aurora Avenue for all modes of travel. Also, a public communication campaign would be used to alert the public regarding the status of construction and various stages of traffic management. In addition to management of traffic during construction, the City proposes immediate and continuous implementation of its Neighborhood Traffic Safety Program (NTSP) for neighborhood streets adjacent to Aurora Avenue both during and after construction. (The NTSP is an ongoing City program to respond to residents' concerns about speeding, cut-through traffic, accidents and pedestrian safety on residential [non-arterial] streets and is not strictly a mitigation measure for this project.) The City would be conducting traffic counts and traffic speed measurements for all adjacent streets. During construction and in future years after the project is completed, the City would monitor traffic conditions on neighborhood streets. If traffic conditions on neighborhood streets warrant action, the City would work with neighborhoods to implement neighborhood traffic and control measures.

The discussion on page 2-7 of the EA/DEIS refers to potential impacts estimated to occur from Alternative 1 from the Pre-Design Study. Consistent with the parameters of the Pre-Design Study, Alternative 1 was a concept that covered all 3 miles of Aurora Avenue North within Shoreline. Fremont Avenue is a continuous street from North 165th Street to North 205th Street. Pre-Design traffic studies indicated that this section of Fremont Avenue would experience a shift in traffic volumes with the implementation of Alternative 1. Within the study area for this project (Aurora Corridor Project 145-165), Fremont Avenue is not expected to experience shifts in traffic volumes different from the No Action Alternative because Fremont Avenue is not a continuous street through the study area.

**Response ID: 27      Bottleneck at North 165<sup>th</sup> Street**

***Responds to Comments: 5-2, 63-59, 63-73***

The Transportation section of the EA/DEIS provides a discussion of how traffic transitions would be accommodated at both the south terminus (North 145th Street) and the north terminus (North 165th Street) for the project. No "bottleneck" for traffic would occur due to implementation of the proposed action. The existing lane configuration along Aurora Avenue is two through lanes southbound and two through lanes northbound with a two-way left-turn center lane. The project improvements include roadway widening of a business access and transit (BAT) lane both northbound and southbound. At the project terminus at North 165<sup>th</sup> Street, the BAT lanes will begin one hundred feet north of the intersection and transition to match to existing lanes. In the southbound direction, the BAT lane widening will serve as a right-turn lane and transit lane. In the northbound direction, the BAT lane serves as a right turn lane to eastbound N 165<sup>th</sup> Street. Only transit vehicles



will continue through the intersection in the BAT lane. Just north of the 165<sup>th</sup> Street intersection, the BAT lane serves a bus stop. The transition for the northbound improvements to match to existing is designed using WSDOT and METRO standards for a Far-Side Bus Pullout after Right Turn. This is a common design; it will neither cause a bottleneck nor create an accident hazard at this location because all traffic except for transit will have turned right or will already be in the through lanes. WSDOT and METRO standards for a bus pullout design are consistent with the American Association of State Highway and Transportation Officials (AASHTO) *A Policy on Geometric Design of Highways and Streets*. Design guidance for bus pullout tapers and lane merges can be found on pages 372 through 374, 501 through 505, 547 through 554. Pages 501 and 502 discuss a far-side pullout, as designed for Aurora Avenue, as a preferred design.

Regarding potential traffic diversion to Dayton and Meridian, see Response ID 26. During operation, little traffic diversion is expected on the streets parallel to Aurora Avenue North. Table 2 in the FONSI shows that Dayton Avenue and Meridian Avenue would see a reduction of 5 to 10 trips in both southbound and northbound directions in the p.m. peak hour in the year 2020. This traffic shows up on the improved Aurora Avenue North section, which gains 30 trips in the southbound direction and 40 trips (p.m. peak hour) in the north bound direction in year 2020.

**Response ID: 28      Bottleneck at Westminster Way**

***Responds to Comment: 5-3, 64-28***

The design for the southbound right-turn onto Westminster Way has been developed with the objective of improving the safety for traffic and for pedestrians walking along Aurora who must cross this right-turn lane.

The southbound connection from Aurora Avenue to Westminster Way would be reconfigured to allow one lane to turn from Aurora Avenue onto Westminster Way. The width of the right-turn exit would be reduced to one lane because only vehicles in the outside lane on Aurora Avenue should legally and safely make that maneuver. Right turning traffic volumes do not warrant a double right-turn lane at this location. Directly after the turn and just beyond the pedestrian crossing, the remainder of Westminster Way southward towards the intersection with North 155<sup>th</sup> Street would be two lanes wide. The radius of this turn would be tighter than the existing turn radius. This turn would handle large trucks (WB-67), and it is expected that trucks would continue to use this route to Westminster Way rather than driving south to North 155<sup>th</sup> Street and then a left turn onto Westminster Way.

By designing this connection as one lane with a tighter radius, the roadway opening across Westminster Way would become smaller to improve safety and to create a manageable pedestrian crossing at Westminster Way and Aurora Avenue on the west side of the street. The Aurora Avenue 145<sup>th</sup> to 165<sup>th</sup> project is planning to keep Westminster Way open. However, the improvements at both Westminster Way and Aurora and the 155<sup>th</sup> Street intersections are designed to accommodate the maximum truck size for this type of facility (WB-67). Consistent with WSDOT and industry standard design guidance, the computer simulation software AutoTURN was the method used to support the ability of WB-67 design vehicles to negotiate this maneuver. The Washington Trucking Association was not contacted about the new intersection design nor is there a requirement to do so.

The City may at some future time pursue closing this portion of Westminster Way to some or all traffic. Appropriate public review will be conducted at that time, and future designs will consider freight traffic accommodation.

**Response ID: 29      Alternative A support**

***Responds to Comments: 6-1, 9-1, 17-1, 22-2, T-4, T-6, T-9, T-11, T-12, T-13, T-21, T-22, T-23, T-56, T-86, T-87, T-90a, T-90b, 28-1, 30-1, 31-1, 41-1, 42-1, 44-1, 45-1, 46-1, 47-1, 48-1, 49-2, 51-2, 54-1, A-1-1, A-2-2, A-13-1***

Your support for Alternative A is acknowledged.

The Proposed Action is a modification of Alternative A, which was featured in the EA/DEIS. It proposes construction of continuous 7-foot wide sidewalks with an adjacent 4-foot wide amenity zone and 6-inch curb that extends the length of the project area, and seven lanes of traffic (two general-purpose lanes and one continuous Business Access/Transit [BAT] lane northbound and southbound, and one center lane for left/u-turn pockets/median). See the description and figures in the FONSI. This action would satisfy many objectives beyond moving automobiles, including improving traffic safety, lighting, transit mobility, improving the visual image along Aurora Avenue and encouraging economic redevelopment. The proposed action would have no significant impacts.

**Response ID: 30      Sidewalk width and BAT lanes**

***Responds to Comments: 7-1, 53-2, A-11-2, A-12-2***

For clarification, the maximum sidewalk width proposed is 8 feet (in Alternative A). An adjacent 4 feet would be used as an “amenity zone” with landscaping, underground utilities, light posts, fire hydrants, etc. Alternative A Modified proposes a 7-foot sidewalk with a 4-foot amenity zone and Alternative B proposes a 7-foot sidewalk with no amenity zone. The “bus lanes” mentioned in the comment are intended to be used both by buses and any vehicle entering and exiting business driveways or turning onto or from side streets (Business Access/Transit lanes). The principal advantage for the sidewalk/amenity zone design that is included in Alternative A and the Proposed Action is the safety and comfort provided for those who walk along Aurora Avenue. City and community objectives for this project included providing a more comfortable and inviting pedestrian environment to help make the City of Shoreline a more walkable city and thus encourage more walking for access to properties and businesses, and for improved access to transit services. The landscaped amenity zone, the buffer from 40 mile-per-hour traffic, and the continuously level walking surface for the sidewalk (i.e. no ramps at driveway aprons) each contribute to a more comfortable walking environment for Alternative A and the Proposed Action, than would be attributable to Alternative B which has essentially no buffer and no landscaping. Other possible safety benefits from the design for Alternative A and A Modified versus B include: clear removal of utilities, poles, and signs from the walking path, thus reducing risk that pedestrians walk or stumble over obstructions; also Alternative B would require wheelchair ramps at driveway aprons which create risk for tripping or loss of control by wheelchair users. WSDOT agrees that a buffer zone between the travel lanes and sidewalk on this facility would be beneficial for pedestrians.

**Response ID: 31      Need left turn at Goldie's**

***Responds to Comment: 8-1***

Although none of the build alternatives would have a left turn directly into this property, left turns could be made at the intersection of Aurora Avenue and North 152nd Street. The property could then be accessed from North 152nd Street.

For a greater discussion of economic impacts, see the Economics section of Chapter 3 in the EA/DEIS.

**Response ID: 32      Small businesses**

***Responds to Comments: 8-2, T-37, T-109***

Economic impacts to businesses as a result of the project alternatives are covered in the Economics section of Chapter 3 in the EA/DEIS. Impacts to businesses such as reduced direct access are anticipated to be offset by increases in mobility and exposure to a larger customer base, and improvements to traffic and pedestrian safety and to the roadway and road edge appearance.

In general, small businesses are more likely to be dependent on location or drive-by customers than larger businesses. Examples in the literature suggest that the businesses most dependent on drive through sales are gas stations and eating and drinking establishments' (1); both of these types of businesses are typically small businesses.

However, adding the words "small business" could be misleading because larger retail establishments (such as a supermarket or other large retailer) can also be affected by a change in access. Thus, the sentence has been reworded the words "Small businesses and" have been removed.

(1) See for example, Anderson et. al. 1992. "Economic Impact of Highway Bypasses, Report 1247-3F". Center for Transportation Research. University of Texas, Austin, Texas.

**Response ID: 33      Increased traffic near North 165th Street**

***Responds to Comments: 10-1, T-50, 38-34, 63-56, 63-58***

The proposed traffic signal at North 165th Street would allow those people who live in adjacent neighborhoods to safely get onto Aurora Avenue. The signal would also provide a "protected" u-turn for north/south traffic on Aurora Avenue, in addition to allowing pedestrians to safely cross Aurora Avenue. The median would restrict left turns out of adjacent streets unless they are signalized. Table 2 of the FONSI documents the results of comparison of traffic diversion for the Proposed Action versus No Action. The improvements to Aurora made with the Proposed Action is expected to slightly reduce the amount of traffic diversion to adjacent streets in comparison to No Action on Aurora. Little or no traffic diversion onto neighborhood streets as a result of the Proposed Action is anticipated. Conditions with the project alternatives would be much improved in comparison to the No Action Alternative in terms of improving traffic and transportation along Aurora Avenue. It is acknowledged that a small amount of traffic from Shoreline Community College may divert through neighborhood streets to N. 165<sup>th</sup> Street. The City will continue to operate the Neighborhood Traffic Safety Program to monitor traffic on neighborhood streets and mitigate impacts. For additional discussion regarding management of traffic on neighborhood streets, see Response ID 70.

**Response ID: 34      Construction air pollution**

***Responds to Comment: 10-2***

Construction impacts to air quality are covered in the Air Quality section of Chapter 3 in the EA/DEIS; these impacts would be temporary. Mitigation measures listed in the Air Quality section and in the FONSI would reduce the localized effects on air quality during construction.

**Response ID: 35      City noise ordinance**

***Responds to Comment: 10-3***

Noise associated with the construction of the Aurora Avenue 145th to 165th project would not be in violation of the City's code. Section 9.05.010.C. of the SMC states "The following sounds may, depending upon location, be public disturbance noises in violation of this chapter: 8. Sounds originating from construction sites, including but not limited to sounds from construction equipment, power tools and hammering between the hours of 10:00 PM and 7:00 AM on weekdays and 10:00 PM and 9:00 AM on weekends."

Section 9.05.010.D. "Exclusion. This chapter shall not apply to the following: 2. Construction or maintenance activities in the city's right-of-way that have been conditioned by the city manager or designee to minimize the impact on adjacent property owners."

**Response ID: 36      Cumulative effect of City projects**

***Responds to Comments: 10-4***

The Aurora Avenue 145th to 165th project, Aurora Avenue 165th to 205th project, and the Interurban Trail are managed by the City's Public Works Department. The proposed Hollywood Casino is a private proposal that must be approved by the City Council. The Planning and Development Services department also has the responsibility of approving SEPA documents for the City's Public Works projects. As a part of the long range planning process, the Planning and Development Services department ensures that all proposed development (public and private) is consistent with the City's goals and policies as stated in the City Comprehensive Plan. The Hollywood Casino project has been through Planning Commission public hearing and has been conditioned to fund Phase 1 Neighborhood Traffic Safety Program (NTSP) for 167<sup>th</sup> and to pay up to \$10,000 for 167<sup>th</sup> traffic calming capital work.

**Response ID: 37      BAT lanes unnecessary**

***Responds to Comments: 11-1, 14-2, 14-3, T-29, 38-20, 63-44***

The "Business Access and Transit Lanes" are not "transit only lanes" nor "HOV lanes". The outside lanes are for right-turning traffic into and out of driveways to adjacent properties and businesses; for right-turns at side streets, and for buses. These lanes would enable right-turning traffic to make turns into and out of these auxiliary lanes rather than the "through" lanes would be used by higher speed through traffic. The lanes for right-turning traffic would reduce "rear-end" accidents as well as many of the "angle" accidents. Allowing buses to use the right-turn lanes helps by removing buses from higher speed through traffic. These outside lanes for Business Access and Transit use would provide 24-hour safety and operational benefits for traffic that makes right-turns into and out of driveways and side streets. These lanes would increase the travel and traffic capacity of Aurora by removing

slower traffic from higher speed through lanes. Also, these additional right-turns at intersections provide capacity and improvement to intersection levels of service.

The greatest need for traffic capacity would be the northbound direction, which is the peak direction of traffic during the PM peak period, the most congested time of day. However, both southbound and northbound lanes would provide operational and safety benefits (as described in the paragraph above), because many driveways and side streets exist on each side of Aurora Avenue. Also, the extra width of the roadway established by adding these lanes in each direction provides additional width for comfortable u-turns at intersections and mid-block turn locations.

The right-turn and transit lanes in Seattle had some increases in traffic accidents associated with them initially. However, the accidents on the Seattle portion of Aurora Avenue were due to a lack of necessary access safety measures such as center median and safe driveway design. Traffic accidents on Aurora Avenue in Seattle resulted when traffic attempted left-turns from two-way left-turn lanes, crossing three-lanes of traffic. Also, driveways were too frequent and their spacing was uncontrolled and unsafe. The comprehensive designs for the Aurora Avenue alternatives in Shoreline would not result in the same problem as observed on Seattle's Aurora Avenue project because the Shoreline Aurora Avenue design process has had the benefit of observing the Seattle experience and therefore has included access safety measures in the project.

Comment 38-20 refers to the term "BAT lane" as it was presented in the *SEPA Determination of Significance and Request for Comment on Scope of Environmental Impacts Statement*. That notice was not intended to give a detailed description of how BAT lanes would be signed, marked, and enforced. The term Business Access and Transit (BAT) lanes was used for this project to simplify the description of these lanes for the public. Fact sheets and other newsletters have been presented to the public to explain the concept. The concept for these lanes is not new; they are operating at hundreds of locations in various forms throughout the U.S. and the world. Similar lanes are in operation in the Puget Sound including on SR99 in the Cities of SeaTac and Seattle, SR 18/348<sup>th</sup> Street in Federal Way and SR 522 in Seattle/Kenmore/Bothell. WSDOT has found the safety performance for these existing lanes to be acceptable when they are accommodated by reduced number of driveways, along with center raised median treatments.

**Response ID: 38      EIS segmentation**

***Responds to Comments: 11-2, 14-1, 16-4, 19-1, T-18, T-20, T-25, T-39, T-55, T-65,, T-107, T-108, 27-9, 27-16, 29-1, 34-1, 37-3, 37-5, 38-1, 38-7, 38-15, 38-17, 38-18, 38-21, 38-23A, 38-24, 53-5, 61-1, 61-7, 61-12, 62-5, 64-3, 64-18, 64-42***

Aurora Avenue North was initially studied in a programmatic fashion in the Aurora Corridor Predesign Study (which can be viewed at the Shoreline City Clerk's office) to determine a roadway concept that could meet the goals stated in the City's Comprehensive Plan. Environmental impacts for all improvements to the transportation system in Shoreline were evaluated in the EIS for the Comprehensive Plan. The concept developed through the Predesign process, along with specific recommendations from the Citizen's Advisory Task Force (CATF), has been carried forward and refined through further public input to provide the basis for project-level alternatives for the Aurora Avenue 145th to 165th project.

Sufficient funding was not available to construct improvements along all 3 miles of Aurora

Avenue North; therefore the section of the corridor with the highest priority needs is being addressed first. The purpose and need for this project is described in Chapter 1 of the EA/DEIS. The purpose of the project is to improve the safety of all users on Aurora Avenue from North 145<sup>th</sup> Street to North 165<sup>th</sup> Street with improved channelization, access management, and pedestrian amenities, and to improve multimodal mobility. The need is related to issues of safety, social demands, and local and regional transportation such as corridor capacity, transit amenities, and system linkages.

The project termini and why they are logical is described in Chapter 2. The northern terminus was set at North 165<sup>th</sup> Street to incorporate the major trip-generating land uses and to accommodate that traffic within the project limits. The southern terminus was set at North 145<sup>th</sup> Street, which is also designated SR 523, because it is a signalized intersection that serves as an access point for traffic flow onto Aurora Avenue. Cumulative impacts, including those potentially caused by the Aurora Avenue North Project 165-205, have been studied for each scoped environmental element in the EA/DEIS and FONSI (including social and economic impacts).

**Response ID: 39      Business lost to north or south**

***Responds to Comments: 12-1, 18-2, 25-4, 36-2, 63-32***

It is unlikely that potential customers would drive through the project area to reach businesses farther north or south only because they could not make a direct left-turn into their desired destination within the project area. The Economics analysis does state that "...access to many businesses along Aurora Avenue North might be less desirable during operations because of the removal of left-turn lanes.... This might impact businesses on the opposite side of the median that rely on impulse purchases because customers might decide to frequent competitors that are located on the same side of the street" (see Attachment 3 in the FONSI). A paper by Kristine M. Williams, AICP, entitled "Economic Impacts of Access Management" (Center for Urban Transportation Research, 2000), the author reviewed recent studies on the business impacts of raised medians and concluded that the installation of medians has little overall adverse business impacts. Any potential impact would be partially offset by the inclusion of left- and u-turn opportunities. Conversely, businesses along unimproved parts of Aurora Avenue to the north and south may be at a disadvantage because there is no access management and signalization to help cars turn left across the street to reach businesses.

The Proposed Action adds an extra lane of space in each direction to Aurora Avenue North, which would allow emergency vehicles extra space to pass compared to current conditions. The two-way left-turn lane is not an ideal travel lane for emergency vehicles because of existing median blockages and the potential for cars to be present waiting to turn. Through communication with the Shoreline Fire Department, response time impacts have been determined to be minor because the positive and negative impacts essentially offset each other.

By reducing congestion in the corridor, increasing capacity and safety for cars, buses, and pedestrians, and improving the visual appearance of the corridor, commercial redevelopment may be enhanced. This would be in accordance with the City's Comprehensive Plan. The anticipated potential for redevelopment is not based on polling or a specific study, but rather on traditionally understood factors that can promote economic

growth or that tend to benefit a positive business environment such as increased customer bases and an attractive built environment.

**Response ID: 40      Not enough pedestrians for sidewalks**

***Responds to Comments: 12-2, 18-3, 61-26, 61-59, 64k-3***

The lack of pedestrians along Aurora Avenue is partially due to the dangerous and uncomfortable pedestrian environment. In most areas pedestrians must walk on the shoulder of the roadway close to traffic with spotty and insufficient illumination. This project includes sidewalks that are ADA accessible and can accommodate bus stops, public benches, and light poles.

Under current conditions, pedestrians are forced to walk along the shoulder of the roadway with nothing separating them from traffic. The Proposed Action has features that would provide a connected, continuous, safe, and pleasant environment for pedestrians. Pedestrian safety would be increased with the inclusion of a 6" vertical curb and the 4' amenity zone that includes elements to buffer pedestrians from traffic.

Aurora Avenue through Shoreline is designated as a National Highway System (NHS) route. Therefore, the minimum sidewalk width required is 6 feet. In accordance with RCW 47.24.020(2), "The city or town shall exercise full responsibility for and control over any such street beyond the curbs..." The Americans With Disabilities Act (ADA) recommends a minimum width for the proposed sidewalks of 6 feet, per the WSDOT Pedestrian Facilities Guidebook (1997). At the discretion of the City, the Proposed Action features a 7-foot-wide sidewalk to strike a balance between pedestrian safety and pleasurable walking experience and creation of an environmental friendly facility.

The Proposed Action, Alternative A Modified, includes a 7-foot sidewalk with a 4-foot amenity zone. The proposed sidewalk width does not only address accommodating the number of pedestrians using the facility but also addresses the comfort of those pedestrians. The principal advantage for the sidewalk/amenity zone design would be the safety and comfort provided for those who walk along Aurora Avenue. City and community objectives for this project included providing a more comfortable and inviting pedestrian environment to help make the City of Shoreline a more walkable city and thus encourage more walking for access to properties and businesses, and for improved access to transit services. The landscaped amenity zone, the buffer from 40 mile-per-hour traffic, would contribute to a more comfortable walking environment. Other possible safety benefits would include clear removal of utilities, poles, and signs from the walking path, thus reducing risk that pedestrians walk or stumble over obstructions. WSDOT agrees that a buffer zone between the travel lanes and sidewalk on this facility would be beneficial for pedestrians.

Additional pedestrian crossings will be provided where new traffic signals are installed (North 152nd Street and North 165th Street). No pedestrian-only crossing signals are included in the Proposed Action. This design would give pedestrians more opportunities to cross the street safely without hampering traffic flow.

**Response ID: 41      Alternative A and B opposition**

***Responds to Comments: 12-3, 18-1, 21-1, 23-1, 25-1, T-45, T-96, 27-1, 36-1, 59-1, 64-1, 64g-1, 64h-1, 64k-1, 64l-1, 64r-1, A-10-1***

Your opposition to Alternatives A and B/the project in general is acknowledged. The City of Shoreline has selected the Proposed Action for construction to address the purpose and needs identified for this corridor from North 145<sup>th</sup> Street to North 165<sup>th</sup> Street. The purpose of the project is to improve the safety of all users on Aurora Avenue from North 145<sup>th</sup> Street to North 165<sup>th</sup> Street with improved channelization, access management, and pedestrian amenities, and to improve multimodal mobility. The need is related to issues of safety, social demands, and local and regional transportation such as corridor capacity, transit amenities, and system linkages. The Proposed Action will improve mobility for multiple modes of transportation through the project area and will improve the safety of travel for vehicles and pedestrians alike with a design that meets current WSDOT standards. This will be accomplished by the Proposed Action at a reasonable monetary cost to the City of Shoreline and without significant impacts to the natural and built environment as documented in this FONSI. Title 23 highway funds administered by the FHWA may only be used for transportation improvements, not the amenities listed in Comment 21-1.

**Response ID: 42      Birth of Aurora Corridor concept**

***Responds to Comments: 13-1***

Improving the Aurora Corridor is an idea that dates back prior to the City's incorporation, and was therefore addressed in many sections of Shoreline's Comprehensive Plan in 1998.

**Response ID: 43      Safety on 15th Avenue**

***Responds to Comments: 15-1, T-93***

This EA/DEIS is only for the Aurora Avenue 145<sup>th</sup> to 165<sup>th</sup> project. Therefore, an evaluation of improvements to 15<sup>th</sup> Avenue NE is not part of this project. (Improvements to 15<sup>th</sup> Avenue NE were evaluated in the City's SEPA EIS for the North City subarea plan.) A project consisting of improvements to address deficiencies and needs of 15<sup>th</sup> Avenue NE will have its own project-specific environmental document. The application of design solutions for a highway need to be tailored to the conditions for that project. Aurora Avenue has high traffic volumes (more than 40,000 Average Daily Traffic, ADT), high speeds (40 mph), would have 3 lanes in each direction, many driveways, and high traffic accident rates, etc. The conditions for 15<sup>th</sup> Avenue NE are not the same as Aurora Avenue.

**Response ID: 44      Redevelopment effects on infrastructure**

***Responds to Comment: A-3-1***

The alternatives discussed for this project would enable redevelopment activities to occur, but would not directly trigger them. Growth within the project area is managed by the City's Comprehensive Plan, and the effects of that growth (including effects on infrastructure) are documented in the Comprehensive Plan's Environmental Impact Statement. Additionally, as redevelopment occurs, site-specific environmental documentation will be processed that will analyze whether improvements to the infrastructure are needed in order to support the proposed land use. Future infrastructure improvements are also discussed in the City's Capital Improvement Program. The City is coordinating construction of the project with Seattle City Light, Puget Sound Energy,



Verizon, Qwest Communications, Comcast Broadband, and Seattle Public Utilities along with the Shoreline Water District in order to accommodate utilities.

**Response ID: 45      Water quality and quantity, and stormwater requirements**

***Responds to Comments: 15-2, T-58, T-59, T-94, 39-1, 16-1, 29-2, 53-8, 55-7, 55-9, 55-11, 58-1, 58-5, 61-42, 61-45, 63-122, 64-2, 64t-1, 64t-6***

Please refer to the FONSI for additional text that describes the regulations regarding flow control and quality treatment, and the stormwater management measures that will be incorporated into the Proposed Action. A summary of the information included in the EA/DEIS and FONSI is provided in the following paragraphs to answer the comments.

Impervious Areas

Under existing conditions, the Aurora Avenue Corridor from 145<sup>th</sup> to 165<sup>th</sup> consists primarily of impervious surfaces with the exception of a few small landscaped areas adjacent to the sidewalks and some of the businesses. The largest area of existing pervious surfaces is near the intersection of 155<sup>th</sup> Street and Aurora Avenue North. The majority of the parcels adjacent to the Aurora Avenue roadway corridor from 145<sup>th</sup> to 165<sup>th</sup> are already developed with impervious surfaces. The redevelopment of Aurora parcels in the future is not expected to necessarily increase impervious surfaces because most parcels in the corridor are already developed. With the Proposed Action, some of the existing landscaped (pervious) areas adjacent to the roadway edges will be converted to roadway or new sidewalks (i.e., impervious areas), however, the overall redevelopment of Aurora Avenue North will also include the *addition* of new landscaped areas along the median and sidewalk planter strips. Therefore, the net change in impervious areas was computed for each build alternative studied. The values for Alternatives A and B are listed in the EA/DEIS, and the values for the Proposed Action are in the FONSI. All of these build alternatives would result in an increase in impervious areas; the smallest increase occurs with the Proposed Action.

Regulations

The City of Shoreline has adopted the *King County Surface Water Design Manual* (SWDM) for development and review of all drainage projects. All drainage designs shall meet the criteria set forth in the SWDM, which includes providing flow control (detention) and stormwater quality treatment for roadway redevelopment projects. Flow control is required when the net increase of impervious surfaces is 1,500 square feet or more. In addition, the City has indicated that the criteria in the Washington State Department of Ecology's 2001 *Stormwater Management Manual for Western Washington* (SMMWW) should also be used in selecting the stormwater flow control and quality treatment measures for the Aurora Corridor Project. The more conservative criteria from the two manuals (SWDM and SMMWW) are to be used. Under either manual, the project meets the description of a roadway redevelopment project.

The requirements of the WSDOT's Highway Runoff Manual and Instructional Letter (IL 4020.02) are described in the EA/DEIS. The latest version of the Instructional Letter says that roadway projects built in the 2003/2005 biennium shall meet "level C" standards, which means that they would follow stormwater controls as described in Ecology's SMMWW. For this project, the City will be following the requirements of Ecology's SMMWW and not the WSDOT Highway Runoff Manual, as described in the previous paragraph.

At this time, there are no requirements specific to a particular basin, such as the Thornton Creek Basin.

Actual sizing and design of the stormwater conveyance, detention and treatment systems will occur as part of the final design process.

#### Stormwater Detention

Using the more conservative criteria from both manuals, flow control of stormwater runoff would be required for only the net new impervious surfaces created under any of the three build alternatives (analyses show each of the three build alternatives result in a net increase in impervious surfaces) in the Boeing Creek and Thornton Creek Basins. It is expected these constructed detention system will likely include a series of underground vaults to detain the stormwater flows. Neither of the two manuals require detention for the existing impervious surfaces in order to reduce “past” impacts; they only require detention for the newly created impervious surfaces that otherwise would contribute additional “impact” above and beyond the existing conditions.

Detention facilities are required to be designed based on a continuous hydrologic simulation model, i.e. a computer model that estimates stormwater runoff flows from rainfall occurring across many years and not for just a single design storm. Both manuals agree on the design standard for the flows released from the detention facilities: durations of the flows released from the facility should not exceed the durations estimated for stormwater flows from the same area under predeveloped conditions for the range of flows from 50 percent of the 2-year peak flow up to the full 50-year peak flow. The predeveloped conditions will be forested land cover (a requirement of the SMMWW) for the area where there is a newly created in impervious surfaces. For instance, Alternative A showed a net increase of approximately 14,000 square feet of impervious surfaces. To determine the required detention volumes for this area, a continuous simulation model would be used to predict stormwater runoff from the area using forested land cover as the pre-existing conditions, and impervious surfaces as the post-project conditions. Then, the model would route the series of storms through a detention facility to obtain the required release rates, and the facility would be designed accordingly.

It should be noted that using forested land cover for pre-existing conditions results in larger detention facilities than if just using current conditions (i.e., grassy, landscaped areas) for pre-existing conditions. Therefore, when providing flow control for these newly created impervious surfaces, the reduction in peak flow rates and durations can be substantial, and even reduce the flow rates to levels less than current conditions, therefore resulting in an overall improvement to the receiving streams, thereby improving fish and wildlife habitat.

Concrete stormwater vaults are accepted methods of providing storage for flow control (SWDM, 1998), and because stormwater does not reside very long in these vaults, the pH of the stormwater would not likely be affected by the concrete material. Due to the lack of available space to build surface water ponds, underground detention vaults are the most practical method to control stormwater flows from the project area, since the soils in the area are not amenable to infiltration.

#### Stormwater quality treatment

The SWDM is more stringent for water quality treatment than the SMMWW because it requires all new and redeveloped pollutant-generating impervious surfaces (PGIS) (i.e., surfaces subject to vehicular traffic, such as roads) to be routed through basic quality treatment facilities. The SWDM defines the basic level of stormwater quality treatment as having a goal of removing 80 percent of the total suspended solids (TSS) for a typical rainfall year. For the Aurora project, if the SMMWW were followed for treatment, it would require an enhanced level of treatment (i.e., targeted removal of some metals as well as TSS), but only for the net new PGIS. For each of the Aurora Corridor Project's three build alternatives, there will actually be a reduction of net new PGIS due to the creation of new sidewalks and center landscaped medians, therefore water quality treatment would not be required using the SMMWW as guidance.

The City has expressed a desire to provide treatment for all new, replaced and existing pollutant-generating impervious surfaces within the project area. Currently, stormwater runoff from the roadway surfaces within the project area goes untreated to the Boeing Creek and Thornton Creek, whereas under proposed conditions, stormwater from all the roadways surfaces will receive basic treatment. This would result in a substantial reduction of pollutant loadings to the streams. These stormwater treatment facilities would most likely be manufactured stormwater treatment devices such as vortex or gravity-type separators or stormwater filter systems installed in vaults. These facilities are expected to be installed under the roadway and/or sidewalk in the immediate vicinity of the detention facilities. Stormwater treatment devices are typically designed to achieve the target 80 percent removal of total suspended. Actual removal efficiencies of each of these types of constructed facilities vary as described in the literature and the manufacturers data.

Other types of stormwater quality treatment devices would be included in the project design. The storm drain inlets or catch basins would be used to receive storm drainage from the streets, and also provide maintenance access. Catch basins have a sump so that settleable solids and heavier particles from the stormwater runoff can be trapped and then removed manually by maintenance personnel. Pollutants such as nutrients and some heavy metals can also adhere to particulates, which settle out and become trapped in the sumps. The City's maintenance personnel should clean these sumps regularly (literature values suggest annual cleaning of each catch basin) and the trapped pollutants would likely be removed from the system and help to improve the downstream water quality.

At the two high-use intersections (145th and 155th Streets), more advanced treatment systems consisting of special oil/water separators will be used. The SWDM recommends the use of API baffle wall oil water separators, coalescing plate oil/water separators, or catch basin inserts to remove free oil from the surface runoff. These two types of facilities are designed to remove free oil from the stormwater, and generally should be placed in the storm drainage system near the potential source (i.e., high-use intersections or gas stations/vehicle maintenance shops). For the Aurora Avenue 145th to 165th project, these devices would be used to separate oil from the stormwater at the 145th and 155th Street intersections, as they are high use intersections. Stormwater runoff from the street surfaces within areas of high use intersections has a much greater potential to entrain oils and greases from cars that may be leaking the contaminants in the long lines at turn lanes or due to accidents. It is important to note, however that these devices are not intended to remove dissolved petroleum products, or antifreeze which is readily soluble in water. Source control

(such as a spill response program after an accident) should help to minimize the potential for these contaminants to enter the storm drain system. Also, oils, gas, and detergents from service stations and/or car cleaning operations are not typically conveyed to the storm drain system, but to the sanitary sewer system instead. An effective public education program would help to prevent these pollutants from entering the surface waters.

#### Existing Storm Drainage

Stormwater from the existing Aurora Corridor street surfaces currently flows to both Boeing Creek and Thornton Creek within the City limits. Storm drainage from a small section of the roadway south of North 145th Street flows into the City of Seattle's Densmore drainage basin, which ultimately ends up in Green Lake. The SWDM specifically states that all surface and storm water from a project area must be discharged to the natural location so as not to be diverted onto or away from downstream properties. Therefore, the proposed project design would maintain the existing drainage routes and ultimate discharge locations per the requirements, after the stormwater runoff has been routed through the required treatment and/or flow control systems for each basin, in accordance with the regulations. In other words, if stormwater drainage from Aurora Avenue North is currently being routed into storm pipes that ultimately flow into Green Lake, then under proposed conditions, the new pipes will collect drainage from the same areas of redeveloped roadway and route stormwater flows first through new detention and treatment systems, and then to the original discharge pipes that ultimately flow towards Green Lake. The City of Seattle does not have to "agree" to this - it is required that flows from one basin not be transferred to another basin. The same process of preserving existing drainage basins would occur for drainage within the Boeing Creek Basin and Thornton Creek Basin.

Stormwater from the project area is presently collected and conveyed in a system composed primarily of storm drains and gutters, with only two areas with open ditches (these two areas are located in the vicinity of N 155th Street and Aurora Avenue North). Therefore, the majority of stormwater is captured and conveyed in constructed drainage system with little, if any, opportunity to dissipate over permeable surfaces.

It should be noted that the constructed storm drain system does affect the existing basin boundaries in ways that are not obvious by looking just at the ground surface. In some instances, the ground surface may be sloping in one direction, but the subsurface constructed drainage system may actually convey stormwater runoff in the opposite direction to an ultimate discharge point. One example of this is a storm drain that runs along the east side of one section of Aurora Avenue in an area where the ground next to the road slopes east and drains eventually to a tributary of Thornton Creek. This storm drain collects the stormwater from the east side of the road, but then the storm drain goes west under Aurora and discharges into another storm drain that ultimately discharges to Boeing Creek. As a result, under existing conditions, that section of the east side of Aurora is in the Boeing Creek basin and not in the Thornton Creek basin.

#### Thornton Creek

Only 4 (four) percent of the total project footprint is located within the Thornton Creek Basin, with the remainder in the Boeing Creek Basin (94 percent) and the City of Seattle's Densmore Basin (2 percent). Less than one acre of street and sidewalk surfaces (approximately 40,000 sf) would be redeveloped in the 7,402-acre Thornton Creek Basin as part of the project design (Thornton Creek Watershed Characterization Report). This

represents only 0.012 percent of the entire surface area of the Basin. The proposed work would occur along 152nd Street and 145th Street (on the east side of Aurora Avenue) as part of the proposed project design. The existing and proposed project land coverage within the footprint of the Thornton Creek Basin consists of almost entirely impervious (paved) surfaces. Therefore, the expected change in stormwater runoff volumes and flow rates from pre-existing conditions to post-project conditions would be insignificant, especially in comparison to the total basin contribution. Nevertheless, in accordance with the City of Shoreline's development code, stormwater detention and treatment facilities would be incorporated into the project design for the small sections of roadway that are in the Thornton Creek Basin, even though the stormwater runoff volumes are a very minor contribution to the entire drainage basin. Stormwater runoff from the affected areas of 152nd and 145th Streets is currently untreated, but under the proposed design, water quality treatment would occur.

#### Surface Water Impacts

The base level for the impact analysis is the No Action Alternative. The impacts caused by the existing conditions within the proposed project area are not addressed as part of the EA/DEIS and FONSI. Reducing existing (or past) impacts on the downstream surface waters is not a requirement for this project. Minimizing additional impacts that would be caused by the project is a requirement. As indicated in the EA/DEIS, the City is working on preparing a stormwater master plan for all the basins. That plan will address how to reduce existing or past impacts on the various receiving waters throughout the City in a way that should result in the most improvement to the receiving waters with the available resources.

The expected impact for the Thornton Creek Basin under proposed conditions would be negligible because the developed footprint is so small in comparison to the drainage basin size, and the fact that stormwater controls will be included to treat all the runoff from the redeveloped surfaces, and provide flow control for the newly created impervious surfaces.

The 3rd NW Drainage Project will not direct additional water to Boeing Creek. The expansion of the drainage pond at this location will increase the amount of water that can be held before it enters the creek. The City will be modeling future stormwater flows in order to adequately set the outgoing flow rate at this location to help erosion problems in Boeing Creek.

#### **Response ID: 46      Capacity and safety over urban renewal**

##### ***Responds to Comments: 19-3***

Considerable deliberation regarding the objectives of the Aurora corridor has occurred over the past five years in the City of Shoreline. A substantial amount of public input has contributed to development of the alternative designs being evaluated for this project. Please refer to the Purpose and Need discussion in Chapter 2; Chapter 4 – Coordination and Comments; and Appendix B – Relationship to Plans and Projects. Past planning studies, including the Aurora Corridor Subarea Plan, the Shoreline Comprehensive Plan, and the Aurora Corridor Pre-design Study resulted in objectives to provide a balance between travel needs for vehicular traffic, transit, and pedestrians; along with objectives to improve the image, visual quality and economic development potential in the project area. Traffic safety for all modes of travel was also very important. Past public process did evaluate a wide range of design concepts in an effort to establish objectives. Design concepts, which put less

emphasis on safety (e.g. inclusion of a two-way, left-turn lane) or placed more emphasis on only traffic capacity (e.g. such as a freeway with interchanges) were not acceptable to the majority of the public and the City Council. The design alternatives included for this project, which address these broader objectives, also meet the national, state, and regional objectives. The City of Shoreline has successfully competed for and won several grants for its design objectives and design concept.

The median (which varies in width but would be 15' wide maximum) provides protected points for vehicles to make left- and u-turns. This corridor experiences a substantial number of accidents due in part to unrestricted access along both sides of Aurora Avenue. Adding a third lane in each direction (whether it is a BAT lane or a general purpose lane) without constructing a raised median with controlled left turns, would exacerbate the problem.

**Response ID: 47      How is capacity improved**

***Responds to Comments: T-32, T-34, 20-1, 27-23, 38-3, 61-24, 61-62, 63-28, 63-112, 64-41, 64-55, A-6-1***

According to the Puget Sound Regional Council travel demand forecasts, traffic volumes throughout the Puget Sound region continue to grow, placing an ever-increasing demand on our transportation system. While the regional transit system will provide additional capacity to accept a share of the traffic growth, our state highways and arterial systems will have to bear much of the upcoming growth, and Aurora Avenue is no exception. Traffic is projected to grow by 20 percent on Aurora Avenue over the next 20 years. Maintaining traffic flow and optimizing the system were major goals of the Aurora Avenue 145th to 165th project and are integrated into the improvements.

Capacity for access across Aurora Avenue, as well as movement along the corridor, is addressed in this project. Improvements are provided in the form of additional turn lanes at intersections to separate conflicting movements and would also be provided through improved signal timing plans that move traffic more efficiently. Growth patterns in the region indicate that traffic along Aurora Avenue will grow at a higher rate than traffic across Aurora Avenue. To improve service to cross-street traffic, additional turn lanes are provided to store or queue vehicles more closely to the intersection, which allows more vehicles to move through the intersection in a shorter period of time. In addition to adding lanes to existing signalized intersections, the addition of new signalized intersections along the corridor would provide greater opportunity to traverse Aurora Avenue in a signal-controlled situation, which is safer and more time-efficient for cross-street traffic than unsignalized movements.

For the future, these improvements would also provide a better balance of cross-street access and eliminate the concentration of traffic on the few neighborhood streets that currently have signalized access to Aurora Avenue.

Aurora Avenue North is currently a five-lane roadway through the City of Shoreline, consisting of two general-purpose lanes in each direction and a two-way, left-turn lane. The roadway would be expanded by an additional business-access and transit (BAT) lane in each direction. Through much of the corridor this means turning the existing paved shoulder into a traffic lane. The purpose of the new lane is to provide a place for vehicles to turn in and out of businesses without disrupting the mainline traffic flow and for transit

vehicles to move through the corridor free of congestion. The business access and transit lane increases both the vehicle capacity and the person capacity of the roadway by helping to improve transit service. The BAT lanes would provide additional right-turn capacity of street intersections. In combination with the BAT lane, the existing two-way, left-turn lane would be converted into a series of focused left-turn and u-turn lanes. Please see the Description of the Alternatives in Chapter 2 for specific locations of left-/u-turns for each alternative. Raised curbing between the lanes would eliminate many of the crossing conflicts that occur with the existing two-way left-turn lane. The focused left-turn and u-turn lanes would preserve access to businesses while greatly improving the safety of the roadway. Based on national statistics, accidents are expected to immediately be reduced by over 20 percent with the new lane configuration. The lane changes that are included with the Aurora Avenue 145th to 165th Project, by providing better separation between through and turning movements, would reduce what is referred to as “traffic turbulence.” Traffic turbulence is created when traffic moves at different speeds, causing drivers to react by braking or abruptly changing lanes. Both of these reactions interrupt the traffic flow and degrade traffic operations and service. Removing traffic turning conflict points would allow traffic to operate more efficiently and reliably. Vehicles entering Aurora Avenue from driveways would turn into the BAT lane, which, due to lower volume than in the general-purpose lanes, would provide a higher frequency of available gaps. Once into the BAT lane, the driver of the vehicle would accelerate to a speed consistent with that of the vehicles, in the adjacent general-purpose lane, find sufficient space to merge, and move into the general-purpose lane to continue the trip.

Coordinating the project traffic signals would increase the capacity of Aurora Avenue. The objective of coordination is having good progression along the major route. With coordinated progression, vehicles along the major route would receive a green light as they approach each intersection. With good progression, a group of vehicles (called a platoon) moves continually at a planned optimal speed. Platooning from signals would help create breaks in the major traffic flow to improve the ability to make left and u-turns. Achieving optimal timing progression requires that signals be regularly spaced. Irregular distances between signals can disrupt the platoon and upset efficient traffic flow, resulting in more total delay. The Aurora Avenue 145th to 165th project includes the addition of signalized intersections at key locations to improve the regularity of signals and to provide additional pedestrian crossing opportunities.

In addition to improved signal timing progression and new signals, the Aurora Avenue 145th to 165th project would provide transit signal priority to help minimize transit delay at intersections. Transit currently carries as much as 10 to 15 percent of trips in the corridor during the peak hour in the peak direction of travel. By 2020 this percentage will rise as transit supports a larger share of trips. Transit signal priority works by detecting a transit vehicle prior to the intersection and providing it a green phase as soon as possible once the vehicle reaches the intersection. Reducing transit delay with signal priority would reduce person delay for a large percentage of travelers in the Aurora corridor.

The principal advantage for the sidewalk/amenity zone design with the Proposed Action is the comfort provided for those who walk along Aurora Avenue. City and community objectives included providing a more comfortable and inviting pedestrian environment to make Shoreline more walkable and thus encourage more walking for access to properties

and for access to transit services. The landscaped amenity zone, the buffer from 40 mph traffic, and the level walking surface for the sidewalk (no ramps at driveway aprons) contribute to a more comfortable walking environment for Alternative A and the Proposed Action than for Alternative B which has essentially no buffer, and has no landscaping. The four foot separation from traffic would provide a slight safety advantage for pedestrians by helping them to avoid stepping off the sidewalk and curb into high speed traffic and/or getting hit by overhanging parts of vehicles, such as rear-view mirrors.

References that provided background studies, assumptions and industry knowledge used in the design and analysis of project alternatives are provided in Section 5 of the EA/DEIS. In addition to the stated references, common transportation and traffic design desktop references such as the AASHTO Green Book and ITE Transportation Planning Handbook were also used. The results of traffic analyses presented in the EA/DEIS and FONSI for this project, are based upon direct application of transportation planning procedures to this project case, including trip generation based upon land use forecasts, traffic assignments, and traffic operations analyses.

**Response ID: 48      Sidewalk width and safety**

***Responds to Comments: 20-3, 38-39, 61-73, 64-75***

Aurora Avenue, into and through Shoreline is designated as a National Highway System (NHS) route. Therefore, the minimum sidewalk width required is 6 feet. In accordance with RCW 47.24.020(2), "The city or town shall exercise full responsibility for and control over any such street beyond the curbs..." Installing sidewalk with a width greater than 6 feet is at the discretion of the City.

The principal advantage for the sidewalk/amenity zone design that is included in Alternative A and the Proposed Action is the safety and comfort provided for those who walk along Aurora Avenue. City and community objectives for this project included providing a more comfortable and inviting pedestrian environment to help make the City of Shoreline a more walkable city and thus encourage more walking for access to properties and businesses, and for improved access to transit services. The landscaped amenity zone, the buffer from 40 mile-per-hour traffic, and the continuously level walking surface for the sidewalk (i.e. no ramps at driveway aprons) each contribute to a more comfortable walking environment for Alternative A and the Proposed Action, than would be attributable to Alternative B which has essentially no buffer and no landscaping. Other possible safety benefits from the design for Alternative A and A Modified versus B include: clear removal of utilities, poles, and signs from the walking path, thus reducing risk that pedestrians walk or stumble over obstructions; also Alternative B would require wheel-chair ramps at driveway aprons which create risk for tripping or loss of control by wheel-chair users. WSDOT agrees that a buffer zone between the travel lanes and sidewalk on this facility would be beneficial for pedestrians.

**Response ID: 49      Increased capacity with signals**

***Responds to Comments: 20-4, T-84, 29-4, 61-66, 63-22***

The additional signals proposed would have a semi-actuated operation and would have green indications for north-south traffic unless demands for left/u-turns or from side streets occur. Also, additional approach lanes have been added at intersections. All traffic signals



would be interconnected and have a coordinated operation. The additional signals are proposed to allow safe access onto Aurora from side streets to allow safe pedestrian crossings and to allow protected u-turns for access to properties and businesses. WSDOT has reviewed the warrant analysis, in accordance with WAC 468, and has approved the new signals.

New arterial master controller hardware and software systems can provide traffic responsive operation which can adapt timing plans to meet varying traffic patterns. Controller software can be configured to optimize arterial operations in terms of vehicle throughput, minimizing corridor delay, critical intersection delay, pedestrian wait time, etc. Comments T-84 and 63-22 are concerned with synchronizing traffic on Aurora, and the effect of adding two new signal at North 152<sup>nd</sup> Street and North 165<sup>th</sup> Street. The effect of the two (2) additional signals has been evaluated and the results of that evaluation is presented in Table 1 of the FONSI. These results are based upon a comprehensive traffic operations using the simulation software SYNCHRO, which can take into account the interrelationship between signals and other geometric features in the corridor. The analyses evaluated the affects of the channelization, intersection designs, u-turns, pedestrian crossings, and signal operations and timing. The findings are that the overall traffic operations will be improved in comparison to No Action. Very little delay to traffic would be experienced at the two (2) new signalization intersections (less than an average of 20 seconds during the PM peak hour in Year 2020). This evaluation of traffic operations takes into account the inter-relationship between the signals in the project. The overall traffic and delays and potential for air pollution will be less than the No Action Alternative. Although a number of features are proposed as a part of the comprehensive design alternatives which will yield more transportation capacity for this corridor, the objectives for adding these two new signals were to serve other objectives. Signals at these intersections will provide for protected u-turn movements; they will allow for improved pedestrian crossings; and they will enable traffic from neighborhoods to have access to Aurora.

Capacity for moving people would be added by including Business Access and Transit (BAT) lanes and other transit amenities to improve transit speed and reliability, therefore enabling more people to access and use transit. Access management treatments, such as the raised median and the BAT lanes, would help improve traffic flow by reducing the number of conflicting traffic movements.

This project includes the addition of signalized intersections at key locations to improve the spacing of signals. The signals along Aurora Avenue would be timed to improve traffic flow. Coordinating a group of signals improves the traffic flow, speed and capacity of a roadway section.

**Response ID: 50      Required median**

***Responds to Comments: 20-5, T-8, T-14, 27-4, 38-8, 38-32, 38-38, 38-40, 38-43, 50-1, 61-64, 61-72, 61-75, 63-17, 64-50, 64-70***

WAC 468-52-040 defines the access control classification system and standards. Shoreline's section of SR 99 is designated as Class 4 Access. Class 4 reads in part, "Highways in this class are typically distinguished by existing or planned nonrestrictive medians. Restrictive medians may be used as operational conditions warrant to mitigate turning, weaving, and crossing conflicts." This regulation suggests that Class 4 highways do include nonrestrictive

medians, including two-way-left-turn lanes. However, rejection of two-way-left-turn lanes (nonrestrictive medians) as a continuous part of the design cross-section for the alternatives is based upon the WAC 468 along with consideration of other design guidance cited below, and the operational considerations of this particular roadway under the future design conditions.

The Washington State Department of Transportation (WSDOT) has reviewed the traffic conditions for the Aurora Avenue 145th to 165th Streets project and informed the City that this project would require a raised median (in other words, a restrictive median) for access safety improvement. WSDOT has participated in the planning and design process for Aurora in Shoreline over the past five years and has continually been clear regarding the expectation that a raised median be included as part of the design. WSDOT presented its requirements at many public meetings as well as several City Council Meetings. WSDOT has design approval authority for any designs for improvements to Aurora Avenue and WSDOT has said a median would be required to obtain project design approval.

This corridor experiences a substantial number of accidents due in part to unrestricted access along both sides of Aurora Avenue. Adding a third lane in each direction (whether it is a BAT lane or a general purpose lane) without constructing a raised median with controlled left turns, would exacerbate the problem. A current example of this design is northbound Aurora Avenue through Seattle, between North 115th and North 145th Streets.

Recent collision history highlights an existing safety concern along Aurora Avenue from North 145th Street to North 165th Street. WSDOT's 2002 evaluation of state highways identified three High Accident Locations (HALs) in this section. In 1999, the roadway within the proposed project limits had an existing accident rate of 7.69 accidents per million vehicle miles. In 2000, this rate increased to 8.79 accidents per million vehicle miles. The statewide average for urban principal arterials in 2000 was 2.52, which was down from 2.61 in 1999. Aurora Avenue through Shoreline experiences an accident rate over three times the state average for urban principal arterials. The accident rate for this corridor is going up while the statewide average is going down.

WSDOT's design policy regarding two-way left-turn lanes (TWLTL), or in other words a nonrestrictive median, is clear. Its Design Manual Chapter 910 - Intersections at Grade (p. 910-7) states in part "Use TWLTL's only in an urban setting where there are no more than two through lanes in each direction." For highways that meet this criteria, WSDOT's Design Manual Chapter 910 stipulates, "The desirable length of a TWLTL is not less than 250 ft." Alternative A (which has the fewest openings of all the build alternatives) proposes intersection openings at North 145th, 149th, 152nd, 155th, 160th, and 165th Streets. The spacing of these intersections leaves little room for TWLTL even if the safety implications of operating such a roadway are ignored. The majority of the length between intersections is needed for left turn pockets.

Comment 61-72 also says that "One alternative was rejected because safe pedestrian crossings are not included, although the proposal submitted by the Shoreline Merchants Association and Concerned Citizens for shoreline, included more safe pedestrian crosswalks than that proposed in Alternative A or B in the DEIS." The discussion of the alternatives rejected cites numerous concerns regarding the alternatives rejected. None of the alternatives were rejected solely due to the lack of safe pedestrian crossings alone. Also

noted in the text regarding alternatives rejected is the concern that signals be provided to enhance safety of pedestrian crossings. The Alternatives A, A Modified, and B include two new signalized intersections, which enable pedestrian crossings at signals.

**Response ID: 51      Include two-way left-turn lane**

***Responds to Comments: 20-6, 64p-1***

Please refer in the EA/DEIS to Chapter 2 – Description of Alternatives, under the discussion of “Alternatives from Scoping” (page 2-7). Various “plans” similar to the concept that the commenter proposes – maintaining the two-way left-turn lane – were included in the EA/DEIS. This concept did not meet project objectives and did not meet the Project Purpose and Need. Also, this concept would not be approved by the Washington State Department of Transportation (WSDOT) for design and implementation.

WSDOT has reviewed the traffic conditions for the Aurora Avenue 145th to 165th Project and informed the City that this project would require a median for access safety improvement. WSDOT’s design policy regarding two-way left-turn lanes (TWLTL) is clear. Chapter 910 of WSDOT’s Design Manual, “Intersections at Grade,” page 910-7, states in part “Use TWLTL’s only in an urban setting where there are no more than two through lanes in each direction.” For highways that meet this criteria, WSDOT’s Design Manual Chapter 910 stipulates, “The desirable length of a TWLTL is not less than 250 feet.” Alternative A (which has the fewest openings of all the build alternatives) proposes intersection openings at North 145th, 149th, 152nd, 155th, 160th, and 165th Streets. The spacing of these intersections leaves little room for a TWLTL even if the safety implications of operating such a roadway are ignored. The majority of the length between intersections is needed for left-turn pockets. Additional information regarding the need for a raised median in lieu of a two-way left-turn lane is provided in Response ID 50.

Left-turn access is currently restricted with a traffic curb for 38 percent of the project length. Left-turn access for the two-way left-turn lane is difficult due to high-traffic volumes. The Proposed Action would not eliminate the ability to make left-hand turns on Aurora Avenue North from North 145th Street to North 165th Street. It includes left-/u-turn locations at least every 800 feet. Figures 2-3 and 2-4 of the EA/DEIS (Alternatives A and B) and Figures 1, 2, and 3 in the FONSI (Proposed Action) show the locations of the left-/u-turn locations.

The raised median could result in lost revenue to some businesses because of the removal of left-turn lanes. This potential impediment will be offset by the inclusion of left-turn and u-turn opportunities. Also, the project will benefit businesses by improving mobility within the project area, thus making businesses more accessible. In addition, the visual quality of the project area will improve, making it a more attractive destination to consumers.

Neither pedestrian nor traffic safety would be improved if the two-way left turn lane remains intact. Please see the description of the “No Action” Alternative in the EA/DEIS.

**Response ID: 52      Alternative A is different than CATF recommendation**

***Responds to Comments: 22-1***

Alternative A is slightly different than the Citizens’ Advisory Task Force (CATF) recommendation of Alternative 2 for the Aurora Corridor Predesign Study (which can be viewed at the Shoreline City Clerk’s office). The design for Alternative A has incorporated

refinements that respond to the CATF's 32 policy points, further public input, and from changes requested by WSDOT after their design review. Primary differences between Alternative A and prior CATF recommended Alternative 2 are: No pedestrian signal has been included at North 149<sup>th</sup> Street; the alignment has been optimized to reduce property and business impacts; intersection approach lanes have been lengthened at some of the intersections; no trees are in the median; outside lanes are slightly wider; and the amenity zone is continuously landscaped.

**Response ID: 53      Sidewalks displace parking**

***Responds to Comments: 23-2, 59-3, 62-2, 64-86***

This project, proposed between North 145<sup>th</sup> Street and North 165<sup>th</sup> Street, studied sidewalk widths of 7 feet or 8 feet depending on the alternative. (Note: the 8-foot alternative and one of the 7-foot alternatives includes an additional 4-foot amenity zone). Most of the existing parking areas along the shoulder are non-compliant spaces according to City code and are within the public right-of-way. This type of uncontrolled shoulder parking endangers both vehicles and pedestrians. Currently 9 of the 86 businesses along Aurora have one or more non-compliant parking stalls that use the Aurora Avenue right-of-way. These non-compliant stalls that will be lost represent a small percentage of the total business parking available (see Tables 3-20 and 3-22 in the EA/DEIS or Table 5 in the FONSI). Although property owners would not be paid for parking stall losses in or partially in right-of-way, business parking areas may be reconfigured with the assistance of the City in order to mitigate displaced stalls. At properties where parking is affected, more than adequate parking remains for businesses to meet building code requirements. Therefore it is not anticipated that any business will close due to loss of parking. Accommodating shoulder parking within the design of Aurora Avenue would widen the street's footprint and impact more private property. Where portions of property are used for display purposes, businesses may be forced to reorient their inventory.

The Proposed Action has a 7' sidewalk adjacent to a 4' amenity zone. A 7' sidewalk width was chosen because it reduced property impacts to parcels adjacent to Aurora Avenue North, while still improving user safety and ensuring a pleasurable walking experience.

The Interurban Trail is intended to provide a pathway for regional bicycle and pedestrian traffic. The Interurban Trail is generally parallel to Aurora but is more than 650' away at 145<sup>th</sup> Street. It is intended to provide regional mobility for bicycles and pedestrians while sidewalks along Aurora Avenue would give direct access to local businesses and to transit service.

**Response ID: 54      Care Plus impacts**

***Responds to Comment: 23-4***

Alternative A includes an 8-foot sidewalk and 4-foot amenity zone, while the Proposed Action includes a 7-foot sidewalk and 4-foot amenity zone. The amenity zone provides space for utilities such as streetlights, fire hydrants, and vaults as well as providing a buffer separation between buses and pedestrians on the sidewalk. The Care Plus building (including adjacent business) currently uses 11 parking spaces in front of its building, including one handicap accessible space, and 47 parking spaces on the north side and rear of the building. The parking in the front of the building is considered non-compliant with City

Parking Code since vehicles must back into the highway right-of-way for entering or exiting the parking space. Under the Proposed Action, the Care Plus front parking would be impacted; however, the Proposed Action would mitigate this impact by providing emergency parking and access in the front of the building in the space between the sidewalk and the building. The edge of the sidewalk on the Proposed Action measures about 16-feet from the building at the narrowest point and 21-feet at the south end of the building. This is enough room to provide one-way access and emergency vehicle parking. In addition, rear parking or side parking would be reconfigured to accommodate lost handicap accessible parking.

Under all of the build alternatives, the nearest left-turn/u-turn opportunity for north bound vehicles heading for Care Plus is located at 149<sup>th</sup> Street North, which is 200 feet north of the Care Plus driveway. A vehicle driving to Care Plus would travel an additional 200-feet north to 149<sup>th</sup> Street and then 200 feet south to the Care Plus facility. This additional 400-feet of travel (200 feet in both directions) traveling at the average speed of 30 miles per hour would result in an additional 9 seconds of travel time.

The Proposed Action adds an extra lane of space in each direction to Aurora Avenue North, which would allow emergency vehicles extra space to pass compared to current conditions. The two-way left-turn lane is not an ideal travel lane for emergency vehicles because of existing median blockages and the potential for cars to be present waiting to turn. Through communication with the Shoreline Fire Department, response time impacts have been determined to be minor because the positive and negative impacts caused by the median essentially offset each other.

The WSDOT guidelines for access safety call for a center median with protected left turns on state highways with three or more lanes in each direction and high traffic volumes. Highway accident data from across the country concludes that whether the driver is a teen, middle aged, or a senior, a protected left turn or u-turn is safer than unprotected two-way left-turn lanes for highways with high traffic volumes and three or more lanes in each direction.

**Response ID: 55      Cut-through traffic and safety**

***Responds to Comments: 23-5, T-17, T-19, T-28, 63-87, 64-13***

The project would include frequent left/u-turn breaks to enable easy access to properties. Most of these left/u-turn locations would have signal-protected u-turns. Also, a Business Access/Transit Lane would be provided to help make right turn access to businesses easier and safer for customers.

Freight access to properties would be maintained by locating the median openings at major truck access points where practical (see Figures 2 and 3 in the FONSI for locations). These openings would make it possible for trucks and emergency vehicles to make left turns into properties along the project. The openings would be designed to accommodate a WB-55 design vehicle, which is typically the largest type of vehicle that uses major arterials.

In addition, trucks making regional deliveries from I-5 would use the I-5 exit that put them in the appropriate direction to make a right turn into their destination. Trucks accessing Aurora Avenue North from I-5 would be able to position for right-in/right-out access by using North 175<sup>th</sup> Street interchange to access properties on the western side of the

roadway and the North 145th Street interchange to access properties on the eastern side. Westminster Way would also provide an alternate truck route to position for right-in/right-out access. Furthermore, most commercial properties along Aurora Avenue North would continue to be accessible using driveways to sites within 300 feet along cross streets.

With respect to neighborhood traffic, the traffic diversion analysis in the FONSI (Table 2) indicates that with the proposed project, traffic would be diverted from Greenwood Avenue N, Dayton Avenue N, Ashworth Avenue N, Meridian Avenue, and 15th Avenue to Aurora Avenue N, thus reducing traffic impacts to these neighborhood streets.

The City proposes immediate and continuous implementation of its Neighborhood Traffic Safety Program for neighborhood streets adjacent to Aurora Avenue. The City has initiated conducting traffic counts and traffic speed measurements on adjacent streets. During construction and after the project is completed, the City will continue to monitor traffic conditions on neighborhood streets. If traffic conditions on the neighborhood streets warrant action, the City would work with neighborhoods to implement neighborhood traffic and control measures. The Neighborhood Traffic Safety Program is an ongoing program paid for through the City's Road Capital Fund.

**Response ID: 56      Left-turn versus u-turn safety**

***Responds to Comments: 23-6, 25-5, 27-24, 36-3, 36-5, 38-12, 59-4, 61-82, 63-49, 63-75, A-11-3, A-12-6***

The primary purpose of the median is to provide a safe refuge area along the center of the roadway for vehicles to make left-turns and u-turns and for pedestrians crossing the roadway. The build alternatives each include left/u-turn locations at least every 800 feet. This reduces the amount of potential conflict points and increases safety substantially. In addition, most of the left/u-turn locations would have signal-protected u-turns. Signalized intersections allow turns to occur during specific, scheduled breaks in the traffic rather than at random intervals. Pedestrian islands alone would not reduce the number of conflict points or provide signal-protected turns.

As described in the EA/DEIS Transportation analysis (page 3-14), the project's comprehensive access management improvements would include the addition of curbs and gutters, application of driveway width and spacing standards, conversion of the existing two-way left-turn-lane into a channelized left-turn and u-turn lane and a median, restriction of driveways to right-turn-in and right-turn-out only, and provision of the BAT lanes. These improvements would allow traffic to safely enter and exit the roadway with fewer conflicting movements and lower risk of crashes.

An extensive comparative evaluation of crash rates on roadways with two-way-left-turn lanes versus raised medians was conducted in NCHRP Report 420: Impacts of Access Management Techniques, TRB, 1999. That evaluation found that the average crash rate on the roadways with a raised median is 30 percent less than those with a two-way-left-turn lane. None of the research over the past 20 years shows that two-way left-turn lanes for a roadway with six lanes, 40,000 vehicles per weekday, and 40 miles per hour speed limit would have lower accident rates than with access management treatments including a center raised median. Some of the research covers projects with longer distances between left/u-turn opportunities. When the distances between left/u-turn opportunities are longer,

then the convenience for access to businesses is reduced while overall traffic safety is likely improved because the frequency of conflicting traffic movements is lower. However, the intent for all of the access management projects was the same, that is to reduce the number of conflicting traffic movements and to focus conflicting/turning movements at fewer locations.

For the Aurora Avenue 145th to 165th project, business owners have been concerned that opportunities for left/u-turns be provided so that their customers can easily access their businesses. The increased frequency for left/u-turns in the two project alternatives has been included to respond to the concerns of business owners. Most of the left/u-turn movements for the proposed action would occur at traffic signals and would have signal controlled protection. The more frequent the left/u-turn locations, the higher the potential for traffic conflicts and traffic accidents. However, note that recent research indicates that a right turn followed by a u-turn is safer than a direct left turn from a driveway (see: Lu, et. al., *Safety Evaluation of Right-Turns Followed by U-Turns as an Alternative to Direct Left Turns-Conflict Analysis*. Report for the Florida Department of Transportation, June 2001; and Zhou, et. al., *A Safety Comparison of Right-Turns Followed by U-Turns as an Alternative to Direct Left Turns from Driveways or Sidestreets*). Center for Urban Transportation Research, University of South Florida, June 2001.) It is further noted that all proposed mid-block median openings for this project are directional openings which allow only left/u-turns **from** the median. It is acknowledged that median openings which allow all turns and have no signal control are less safe. Also, median openings which allow left turns from driveways into the median have not been included in the proposed action. All of the median opening designs for the proposed action will be reviewed by WSDOT prior to approval for implementation. Each of the openings is being included to serve a purpose, generally to provide a mid-block access point as well as to remove u-turns from downstream signalized intersections. These benefits will be compared to the potential risks for turning conflicts caused by the openings.

Comment 63-49 refers to NCHRP Report 17-21: Safety of U-turns at Median Openings by Ingrid Potts, which was to be available May 2003. The project team visited the Transportation Research Board web site, which posts NCHRP reports, to determine whether or not this report is available, and to review its findings if available. As of July 15, 2003, the report was not yet available on the Transportation Research Board web site.

All of the build alternatives also provide pedestrian safety improvements that would make the corridor safer for pedestrians. Pedestrian safety improvements along the corridor include continuous sidewalks; pedestrian-scaled lighting; and improved pedestrian crossings including, signalized street crossings and median refuge islands at all pedestrian crossings.

**Response ID: 57      Dangerous left-turns out of property**

***Responds to Comments: 24-1, T-91***

Property access is affected by the design and spacing of driveways, the ease and safety of pulling off or onto a road, the distance from intersections, and traffic signal sequencing. Access safety improvements, including the median, would enhance access to properties by providing safe and easy access. The business access and transit lanes would allow comfortable customer access in and out of businesses. Left turns out of properties would be

eliminated and would have to be accommodated by using left turn pockets at intersections or midblock.

Under the Proposed Action, drivers leaving your property at 16523 Aurora Avenue North and wishing to travel northbound would turn right and then have the option of changing lanes quickly to reach the left-turn light at North 165<sup>th</sup> Street if traffic space allows, or continuing to the midblock left- and u-turn pocket near North 163<sup>rd</sup> Street (620' away) or the signalized left-turn signal at North 160<sup>th</sup> Street (1340' away). Using the protected left- and u-turn opportunities with the assistance of timed signals would be safer than turning left across the highway under current conditions.

Access to some of the businesses along Aurora Avenue North would be less direct because of the removal of the 2-way left-turn lane and installation of the median with left- and u-turn pockets. This would likely equally impact and benefit businesses on both sides of the median that rely on impulse purchases because customers might decide to frequent competitors that are located on the same side of the street. This impact/benefit would be partially offset by the inclusion of left- and u-turn opportunities in the median and at intersections.

The Proposed Action has the potential to contribute to an increase in property values within the corridor. Property values will be determined by market forces, which are driven by supply and demand. The roadway improvements will improve access to businesses in the area, which might make properties more attractive for businesses and new development. Other factors that affect property values include local zoning and land use regulations, local development trends, and other social and economic factors.

**Response ID: 58      CATF representation**

***Responds to Comments: 25-2, T-70, 27-7, 27-8, 59-2, 63-39, 64-9***

The Citizens Advisory Task Force (CATF) was appointed by the City Council as an advisory committee to the City Council of the Aurora Pre-Design Study on October 26, 1998. It was not intended to be a legislative or decision making body (see Ad Hoc CATF By-Laws, Article II). The CATF was an advisory committee, so meeting minutes and voting records were not officially taken for all meetings.

A summary of CATF participation in the study of Aurora can be found in the document entitled Aurora Avenue Corridor Pre-Design Study and Technical Appendices. The CATF held 13 meetings to discuss topics relating to aurora and every meeting was open to the general public and the public were provided opportunity to provide comments at each meeting. The CATF comprehensively addressed topics such as: issues and concerns regarding Aurora; potential options and solutions; they created three different alternatives; they evaluated the alternatives; they selected their consensus alternative; made refinements to that alternative; and drafted recommendations including 32 policy points to guide further design of the Aurora improvements. As the study proceeded from step-to-step, input was also received through 3 public open houses; and 8 City Council Meetings. Wide differences in opinions regarding aspects of solutions for Aurora were heard, and CATF members were fully aware of various opinions and preferences. Additional information regarding the purpose of the CATF is provided in Response ID 250, and additional information about the public involvement process is provided in Response ID 83.



The issue of sidewalk design, and inclusion of an amenity zone, was discussed at several of the CATF meetings. The committee members discussed the pros and cons for minimum width sidewalks as well as 16-foot wide sidewalks. The issue of existing City Development Code for sidewalks was discussed, in that the code at that time required 8-foot wide sidewalks with a 4-foot landscape strip. Also discussed was the fact that several developments had already been required to build sidewalks to those requirements. It was further noted that an amendment or variance to the code would be needed if a different width sidewalk were to be implemented. Ultimately the CATF agreed to a consensus position regarding their recommendations for the Aurora Corridor, as reflected in their 32 policy points (see Chapter 1 of the EA/DEIS). The CATF Point No. 3 says: "Twelve foot sidewalks will be provided on both sides of Aurora the entire length. Consider reducing the initial sidewalk width to mitigate land impacts/acquisitions on existing businesses. Note: a minimum of four feet of a landscaping/ street furnishing zone is included in the twelve foot width total above." The CATF, through their committee Chair and Vice-Chair, presented the CATF recommendations to the City Council on August 23, 1999. At that meeting, other members of the CATF also provided testimony, as did many other community members. All of these opinions were considered by the City Council.

Regarding membership of the CATF, the CATF had 13 positions including: 5 business owners/tenants for businesses along Aurora, 3 representing neighborhoods along corridor (Carol Doering, Linda Minarcin, and Brian Doennebrink), 1 Shoreline Chamber of Commerce member (Terry Green), 1 representing special transportation interests (Paulette Gust), and 3 citizens at large (Bonnie Mackey, Patricia Lewis, and Jun Quan). The five business owners/tenants for businesses along Aurora included: Chuck Olson (Chuck Olson Chevrolet), Marilyn Santana (Manager of Sears), Bill MacCully (Minuteman Press), Harley O'Neil (Royal Property Management, commercial property owner), Pup-Shin Park (Highland Pharmacy). In addition, the Chamber representative has ownership interest in Highland Ice Arena, and one of the neighborhood representatives (Linda Minarcin) resides on the corridor. The Chair (Harley O'Neil) and Vice-Chair (Carol Doering) were appointed by the Mayor. The members of the CATF were recommended by the Mayor and appointed by the City Council at a public meeting in October 1998. Relating to Comment 63-39 regarding the diversity of the CATF, while the Council did not specifically have ethnic diversity as one of their criteria for appointing members to the CATF, two members (Mr. Quan and Mr. Park) out of the 13 are ethnic minorities. Seven out of the 13 members were women. Thirty-six people had applied for the committee, of which 13 were appointed.

The representation of the CATF was designed to include a balance of input from many sectors of the community, to avoid any particular conflict of interest. Although there were 6 members from businesses and one commercially zoned residential property owner along Aurora, which may benefit from improvements to Aurora, these members were balanced by the other 8 representatives from the neighborhoods, transportation interest, and citizens at large. The recommendations provided to the City Council were advisory. City Council members followed the study process throughout, and held 8 additional City Council Meetings to review and discuss Aurora. Each of those meetings included the opportunity for public testimony. The improvements to Aurora are anticipated to provide benefits to the entire community.

The CATF membership included positions for 3 neighborhood representatives. There are 7 different neighborhoods adjacent to Aurora (Hillwood, Highland Terrace, Richmond Highlands, Westminster Triangle, Parkwood, Meridian Park, Echo Lake). Therefore, in keeping with the desire for creating balanced representation, it was not practical to appoint a representative from each of the seven neighborhoods. This is the reason that a representative from the Meridian Park Neighborhood was not on the CATF. However, neighborhood members did present their views regarding Aurora at 3 Open Houses, 3 Planning Commission Meetings, 8 City Council Meetings, and 13 CATF Meetings. Staff and CATF members continually provided outreach and communication to special interest groups, or other civic organizations (Chamber of Commerce, Rotary, King County Council for Blind, League of Women Voters, Aurora Improvement Council/Shoreline Merchants Association). In addition, presentations were made during the Pre-Design study to the following Neighborhood Associations: Hillwood, Meridian Park, Westminster Triangle, Richmond Beach, Innis Arden, Echo Lake.

The CATF's 32 Policy Points have provided guidance to the City staff and City Council throughout the continued development and evaluation of the design concepts for Aurora. Besides Point 3 regarding sidewalk width, other examples include:

- 6) "Re-align the street where possible to avoid property takes." This has been accomplished on the 145<sup>th</sup>-to-165<sup>th</sup> Project to reduce impacts.
- 8) "Develop median breaks or intersections for business access and u-turns." The preferred Alternative A-Modified, includes median breaks for left/u-turns at an average of every 750 feet.
- 28) "Consider new signalized intersections at 152<sup>nd</sup>, 165<sup>th</sup>." The preferred Alternative A-Modified includes new signals at these two intersections.

The adopted design also implements interim sidewalk widths at three properties along the 145 - 165 project: CarePlus Center, Seattle Ski, and the commercial building that includes Shays.

#### **Response ID: 59      U-turns for trucks**

##### ***Responds to Comments: 25-6, 38-50, 60-4, 61-83, 64o-1***

See the Transportation section of the EA/DEIS for discussion regarding "Truck and Vehicle Access." The median would require a change in truck routes; however, little impact on neighborhood streets is expected. Also, see Response ID 55 regarding neighborhood traffic. Truck drivers should adjust to changes in access by utilizing North 145<sup>th</sup> or North 175<sup>th</sup> Street from I-5 to ensure that they are on the right side of the road.

#### **Response ID: 60      Emergency vehicles**

##### ***Responds to Comments: 25-7, T-99, 27-21, 59-6, 61-32, 63-105, 64-22***

The Social section of Chapter 3 in the EA/DEIS discusses the potential impacts to emergency vehicles. Under the heading of "Services," positive and negative impacts to fire and emergency response times are acknowledged. The Proposed Action adds an extra lane of space in each direction to Aurora Avenue North, which would allow emergency vehicles extra space to pass compared to current conditions. The two-way left-turn lane is not an ideal travel lane for emergency vehicles because of existing median blockages and the potential for cars to be present waiting to turn. Through communication with the Shoreline

Fire Department response time impacts have been determined to be minor because the positive and negative impacts essentially offset each other. There are no anticipated impacts to police response times because police vehicles do not use a fixed route to reach response area; their route varies depending on the location of the police vehicle and the response area. These assessments are supported by statements from the city police and fire departments.

The existing two-way left-turn lane ranges from 12 to 16 feet in width. The median is designed to be a maximum of 15 feet in order to provide enough room for left- and u-turning vehicles and a slender separator in the left- and u-turn pocket areas. A 12-foot median could not accomplish this.

**Response ID: 61      EIS cost and availability**

***Responds to Comments: 26-1, T-80, 50-40***

The EA/DEIS's notice of availability that was published in local papers, as well as the City of Shoreline's notification mailers and website notice, indicated that copies of the document could be purchased at the Shoreline City Clerk's office. Copies were also made available in the City libraries. The price of the document is equivalent to the cost of copying it. To make the document more accessible, the City offered electronic copies of the Final EIS in pdf format on cd's. The City does not currently offer EISs on their website. Whether or not the FONSI will be available on cd will be determined by FHWA and WSDOT.

This project is proposed by Shoreline's Public Works Department; for questions on the project please contact project manager Kirk McKinley at (206) 546-3901. The police station is not prepared or equipped to answer questions about the Aurora Avenue 145th to 165th project.

**Response ID: 62      Vague summary at open house**

***Responds to Comment: 26-2***

The summary provided at the open house attempts to capture dozens of pages of analysis in a few pages; it was impossible to reflect all of the nuances contained within the EA/DEIS in that summary. The open house was staffed by City and WSDOT representatives as well as technical members of the consultant staff who answered questions throughout the open house. The speakers at the open house had three minutes (five minutes if representing an agency) to offer public verbal comments on the EA/DEIS. These comments were recorded and responded to, and have been presented in the FONSI.

**Response ID: 63      Public hearing in September**

***Responds to Comments: 26-3, T-24, 37-1***

The summary provided at the open house was intended to help open house attendees see the comparative differences between impacts of the alternatives. It was not a substitute for the detailed analysis contained in the EA/DEIS. The EA/DEIS was available 28 days before the public hearing – almost double the minimum amount required under NEPA – and contains a summary chapter. A hearing in September as requested by these comments would have resulted in a unnecessarily long comment period. Because of the unsafe conditions on Aurora Avenue North this project is time sensitive; City staff are committed to keeping the project moving forward in a timely fashion as appropriate. Therefore, the

timing between the date public hearing relative and the date of issuance of the EA/DEIS was kept within the normal range for NEPA EA's and SEPA EIS's.

**Response ID: 64      "Alternative C"**

***Responds to Comments: 25-8, 26-4, T-30, T-64, T-71, T-76, T-97, 27-14, 33-2, 34-3, 37-25, 38-5, 38-22, 38-37, 38-41, 53-1, 53-3, 59-7, 61-3, 61-10, 61-71, 62-1, 62-6, 63-66, 64-10, 64-69, 64j-4, 64r-2***

The EA/DEIS had no "Alternative C" proposed for analysis. A specific design has recently been proposed by the Shoreline Merchants Association which it has named "Alternative C" is understood to include two general purpose lanes southbound and northbound, one Business Access and Transit lane in each direction, a continuous two-way-left-turn lane, underground utilities, pedestrian safety islands and grade-separated pedestrian crossings, street lighting, and 6-foot-wide sidewalks. In the Comments to the Scope of the EIS (i.e. the scoping process from August, 2001), members of the SMA proposed a similar concept that was listed and reviewed in Chapter 2 (P. 2-7 of the EA/DEIS) and identified as: "5' sidewalks, 13' northbound and southbound BAT lanes, two 11' northbound and southbound general-purpose lanes, 14' two-way left-turn lane, amenities on private property." This concept is nearly identical to Alternative B, except for the continuous two-way-left-turn lane and the grade separated pedestrian crossings. NEPA requires that a range of reasonable alternatives be examined, but not that all alternatives be examined. In Chapter 2 of the EA/DEIS, there is a section titled "Alternatives Examined but Rejected" which explains why the design proposed in the comment has been screened out of the final evaluation. Two-way, left-turn lanes were not included in alternatives because they are not safe when applied to the conditions along Aurora (6-lanes, 40 KADT, 40 MPH, high driveway densities. Refer to Response ID 50 and 56 for more discussion regarding why two-way-left-turn lanes have not been included in the alternatives. Pedestrian grade separations were not included in alternatives because of the right-of-way and cost required to develop them. Refer to Response ID 293 for more discussion regarding why pedestrian grade separations have not been included in the alternatives. Regarding evaluation of an Alternative that fits within the existing 110-foot right-of-way for the 145-to-165 Project, both Alternative A - Modified (110-feet total width) and Appendix B (102-feet total width) enabled evaluation of alternatives that accomplish that objective.

The Proposed Action is a modification of Alternative A, which was featured in the EA/DEIS. It proposes construction of continuous 7-foot wide sidewalks with an adjacent 4-foot wide amenity zone and 6-inch curb that extends the length of the project area, and seven lanes of traffic (two general-purpose lanes and one continuous Business Access/Transit [BAT] lane northbound and southbound, and one center lane for left/u-turn pockets/median). See the description and figures in the FONSI. This action would satisfy many objectives beyond moving automobiles, including improving traffic safety, lighting, transit mobility, improving the visual image along Aurora Avenue and encouraging economic redevelopment. The proposed action would have no significant impacts.

**Response ID: 65      Surface water summary is vague**

***Responds to Comments: 26-5***

It is assumed that the comment is referring to the summary of impacts available at the open house and not to the summary chapter in the EA/DEIS. The summary provided at the open house was intended to help open house attendees see the comparative differences between

impacts of the alternatives. It was not a substitute for the detailed analysis contained in the EA/DEIS.

Stormwater facilities would both treat water and detain water amounts to the standards outlined in King County's Surface Water Design Manual as well as Ecology's Stormwater Management Manual for Western Washington. For more information, see the Surface Water/Water Quality section in Chapter 3 of the EA/DEIS or Response ID 45 on stormwater requirements.

**Response ID: 66      Echo Lake/McAleer Creek Basin impacts**

***Responds to Comments: 26-6, 26-8, 37-32***

Echo Lake is in a watershed basin separate from those that intersect the project limits of the Aurora Avenue 145th to 165th project. Therefore, no stormwater runoff flows from this project would enter Echo Lake, Lake Ballinger, or McAleer Creek. Stormwater facilities that treat and detain runoff would only benefit water in the Boeing Creek, Thornton Creek, and West Lake Washington Basins.

**Response ID: 67      When will Aurora Avenue from North 165th Street to North 205th Street, including Echo Lake, be studied**

***Comments 26-7, T-10, 61-43***

The Aurora Corridor Project 165–205 will undergo a full project-level environmental review (including scoping for alternatives and environmental elements to be covered) if and when funding is available. Impacts to Echo Lake will be considered as part of the environmental review of the Aurora Corridor Project 165-205.

**Response ID: 68      Current design influence**

***Comments 26-9, T-75, 27-10, 37-4, 37-10, 53-4, 64-65***

Aurora Avenue North from North 145<sup>th</sup> Street to North 165<sup>th</sup> Street was judged to have greater needs than the rest of the corridor within the City of Shoreline. This mile of Aurora Avenue North has a higher accident rate and the highest volume of traffic compared to the other two miles. For a full discussion of why the endpoints of this project are rationale, please see the "Project Termini and Why They Are Rational" section of Chapter 2 in the EA/DEIS.

Improvements made along Aurora Avenue North from North 145<sup>th</sup> Street to North 165<sup>th</sup> Street would not preclude other forms of project designs elsewhere along the same arterial. The City is conducting a "Central Sub-Area Plan" for the area along Aurora Avenue North from approximately North 172nd Street to North 187th Street. Entirely different design configurations for Aurora Avenue North, including the connection of Ronald Place in the vicinity of North 172nd Street may be considered for that area. If those options include grade separations with ramp connections to Aurora Avenue North, those designs would potentially extend southward to about North 170th Street. Therefore, for future environmental reviews for the portion of the corridor north of North 165th Street or south of North 145th Street, new information and alternatives can be considered and implemented independent of this project. Please see "How This Project Would Not Preclude Options North or South" in Chapter 2 of the EA/DEIS.

Regardless of the design of roadway improvements north of North 165<sup>th</sup> Street, any future project along SR 99 will need to accommodate stormwater runoff impacts that can affect local surface water bodies such as Echo Lake. See Response ID 45 for a discussion of stormwater requirements that apply to this project.

**Response ID: 69      Left-turns in the median**

***Responds to Comment: T-1***

The Alternatives contained in the EA/DEIS showed a range of potential left- and u-turn breaks in the median. Alternative B had more breaks for turning, but this design may not have been fully approved due to WSDOT design standards. The City and WSDOT worked together to maximize the number of left- and u-turn breaks; this design is now featured in the Proposed Action.

**Response ID: 70      Traffic circles**

***Responds to Comment: T-2***

The Neighborhood Traffic Safety Program would be utilized to address cut-through traffic issues. The City would undertake a neighborhood traffic safety program along the Aurora Corridor. This program includes collecting baseline count information, monitoring of traffic impacts, and mitigation of the impacts should they be necessary. The City would monitor traffic impacts on adjacent and parallel streets to Aurora Avenue during construction and after construction. The program would also include spillover traffic monitoring during construction, with temporary traffic control measures. The counts would eventually be incorporated into the City traffic count program. If a street has traffic growth resulting from the Aurora Avenue 145<sup>th</sup> to 165<sup>th</sup> project that is documented to exceed the threshold, then physical devices may be installed such as traffic circles, diverters, chicanes, or street closures.

**Response ID: 71      Reduce sidewalks where buildings would be impacted**

***Responds to Comments: T-3, 32-3, A-12-4***

As necessary, the sidewalk width would be reduced in order to avoid altering or displacing existing buildings. Seattle Ski and the Hideaway Card Tavern are the two buildings that have the greatest potential for having reduced sidewalk widths in Alternative A Modified. The Aurora Avenue 145<sup>th</sup> to 165<sup>th</sup> project would result in no building displacements, including at these two properties. Interim sidewalks would be built in areas where the full width for sidewalk and amenity zone cannot be realized due to building conflicts.

Despite the lengthy history of use, most of the existing parking areas along the shoulder are either non-compliant spaces according to City code or within the public right-of-way. This type of uncontrolled shoulder parking endangers both vehicles and pedestrians. Although property owners would not be paid for parking stall reductions, parking areas may be reconfigured with the assistance of the City in order to mitigate displaced stalls. Remaining parking is judged in the FONSI to be adequate for the businesses according to City codes.

**Response ID: 72      Alternatives for Aurora Avenue 165<sup>th</sup> to 205<sup>th</sup>**

***Responds to Comment: T-5***

Alternatives A and B in the EA/DEIS are only for the Aurora Corridor Project 145-165. Alternative A Modified was developed based on public input and the value engineering

study and is the Proposed Action featured in this FONSI. These three designs may or may not be included as a part of the Aurora Corridor Project 165-205, and therefore, cost estimates for these projects (from 165 to 205) cannot be developed at this time. The project covering Aurora Avenue North from North 165th Street to North 205th Street will undergo its own separate scoping process to develop alternatives and subsequent design and cost estimates.

**Response ID: 73      Study area and pedestrian safety**

***Responds to Comments: T-7, T-41, 27-18, 37-28, 61-11, 64-17***

The EA/DEIS analyzes impacts greater than 50 feet away from the roadway. The description in the Fact Sheet in the EA/DEIS that states “the outer limits of the project are approximately 50 feet beyond the Aurora Avenue North right-of-way lines” is intended to convey the likely area of possible construction activity (including staging areas) and not the limits of the study area for environmental impacts. The impact study area was made as large as necessary to communicate the impacts to the environment (described on the Introduction page in the EA/DEIS). This varied by environmental subject. For example, the economics analysis considers impacts to parking spaces that are located close to the street as well as property and sales tax impacts that can have a city-wide impact.

For traffic impacts to neighborhoods, the study area reached from Greenwood Avenue North to State Route 522 between North 155th Street and North 160th Street. Potential traffic impacts to neighborhoods are discussed under the heading “Traffic Diversion” on pages 3-12 and 3-13 of the EA/Draft EIS and also on page 3.3 in the FONSI. The analysis of traffic diversion indicates that under the Proposed Action, traffic would be diverted from Greenwood Avenue North, Dayton Avenue North, Ashworth Avenue North, Meridian Avenue, and 15th Avenue North to Aurora Avenue North, thus reducing traffic impacts to neighborhoods.

On the topic of pedestrian safety, the EA/DEIS studied how the alternatives impact pedestrians along Aurora Avenue. How pedestrians cross other streets in their neighborhoods is beyond the scope of this project. Pedestrian safety in neighborhoods could be impacted if there were a change in traffic levels on neighborhood streets as a result of this project. All of the build alternatives provide some level of pedestrian safety improvements that would make the corridor safer for pedestrians. Pedestrian safety improvements along the corridor include continuous sidewalks; pedestrian-scaled lighting; and improved pedestrian crossings, such as signalized street crossings and median refuge islands at all pedestrian crossings.

**Response ID: 74      Safety data**

***Responds to Comments: T-15, T-35, T-52, 27-3, 38-11, 38-13, 38-14, 38-25, 38-29, 38-31, 38-36, 38-44, 61-21, 61-40, 61-61, 61-63, 61-69, 61-80, 63-11, 63-54, 63-76, 64-46, 64-62, 64-84***

The source of all accident data reported in the EA/DEIS and FONSI is from WSDOT. WSDOT obtains accident data from the Washington State Highway Patrol which collects all traffic accident data for state highways. Aurora Avenue is classified as an Urban Principal Arterial.

In 1999, Aurora Avenue from N. 145<sup>th</sup> Street to N. 165<sup>th</sup> Street had an accident rate of 7.69 accidents per million vehicle miles. In 2000, this rate increased to 8.79 accidents per million

vehicle miles. The accident rates are calculated for the N. 145<sup>th</sup> to N. 165<sup>th</sup> Streets project. Comments T-35, 38-31, 61-69 and 61-80 are referring to a calculation for different limits (they imply 145<sup>th</sup> to 205<sup>th</sup> Streets). The statewide average for Urban Principle Arterials in 2000 was 2.52, which was down from 2.61 in 1999. Aurora Avenue through Shoreline experiences an accident rate over three times the state average for Urban Principal Arterials. The accident rate for this corridor is going up while the statewide average is going down. It is acknowledged that accident rates may vary slightly for each year they are calculated. No additional data from other years is needed to conclude that the accident conditions for the project area are far worse than the statewide average for Urban Principle Arterials. Concern regarding traffic safety on Aurora Avenue is a major issue to Shoreline community members. Improving traffic safety has been a primary objective for this project. WSDOT is strongly supportive of implementing traffic safety improvements for this Aurora project.

Comments 63-11, T-15, and T-52 claim that none of the intersections along Aurora are listed within the State's 71 intersections with the highest accident rates. This claim is true. However, the Aurora 145<sup>th</sup> to 165<sup>th</sup> Streets project limits still have very high accident rates, and traffic safety measures can be implemented which can dramatically improve the safety performance of this roadway. WSDOT's 2002 assessment of the state highway system identified three high accident locations (HAL's) within the project limits. They were:

- MP 40.21 to MP 40.59 (N. 140<sup>th</sup> to N. of N. 145<sup>th</sup>) (While a portion of this HAL is outside of the project limits, the major intersection within the HAL, N. 145<sup>th</sup>, is within the HAL)
- MP 40.66 to MP 41.10 (N. 149<sup>th</sup> to N. of N. 155<sup>th</sup>)
- MP 41.17 to MP 41.45 (S. of 160<sup>th</sup> to N. of 163<sup>rd</sup>)

The cumulative mileposts for these three HAL's include 83 percent of the project corridor.

Comment 63-76 questions how "the total number of crashes per year would be higher than existing conditions" in the Year 2020 without implementing any traffic safety improvements. As indicated in the second paragraph above, the accident rate increased from Year 1999 to Year 2000, according to WSDOT. Even if the accident rate remained the same, the traffic volume by Year 2020 is anticipated to increase by 15 to 20 percent. The increase in traffic alone will lead to a higher total number of crashes.

**Response ID: 75      Value engineering**

***Responds to Comments: T-26, 38-16, 64-10a***

A value engineering study was performed on the project. The recommendations of the study have been considered along with public and agency comment to improve the alternatives contained in the EA/DEIS. As a result of this, Alternative A Modified is the proposed action in the FONSI. Some VE proposals were accepted and will be implemented by the City such as using drought tolerant plants in the landscaping, consolidating light fixtures to save cost, abandoning existing storm pipes in place, and minimizing utility trenching costs by putting main distribution lines down one side of the street. Many of the VE proposals require WSDOT approval, such as reducing outside lane width to 12-feet and reducing the interior lane width to 11-feet, which deviate from WSDOT Design Manual Guidance, and speed limit reduction to 35mph. Reducing the speed limit on Aurora Avenue



to 35 mph now rather than later has been presented to WSDOT for approval but has been determined unacceptable. WSDOT maintains that motorists become accustomed to driving the posted speed limit and by arbitrarily reducing that posted speed, the majority of motorists will end up routinely violating the legal speed limit. The reduced posted speed will not encourage voluntary compliance, and may in fact cause more erratic driver behavior and increased safety hazards between vehicles and pedestrians. WSDOT will not approve this proposal. It is likely that after construction, the City and WSDOT will observe changes in driver behavior and perform a speed study to determine if lowering the posted speed to 35 mph is acceptable at that time.

City staff has no record of a written request from the SMA to obtain a copy of the Value Engineering Report and did not intentionally withhold the document from the SMA or any other member of the public. The SMA did receive a copy of the study in June 2002, 11 months after it was issued. The study was intended to be used for the improvement of the alternatives under consideration in the EA/DEIS, which wasn't issued until July 2002. Receiving a copy of the VE Study 11 months after it was finished did not prevent the SMA from giving public comments on the design of the alternatives in the EA/DEIS (and making mention of the VE Study and its contents) within the confines of the environmental process.

The VE Study has 22 proposals; none of them recommend that the City of Shoreline work with the Aurora Improvement Council (now SMA) on this project, as stated in the comment (although having the AIC assist in the development and implementation of an Enterprise Zone and a Parking District was a brainstormed idea). However, Chapter 4 in the EA/DEIS outlines all of the community involvement undertaken for this project including property/business owner block meetings, individual property/business owner meetings, open houses, city council meetings, fact sheets, and newsletters. City staff believe that they have heard and considered input from all stakeholders involved in the project.

**Response ID: 76      Federal grant requirements**

***Responds to Comment: T-27***

The City grant applications did specifically propose that the Aurora improvements would include BAT lanes (refer to Response ID 37 for more information on BAT lanes). However there are other reasons why the City, the public, and other participating agencies have proposed this concept for inclusion in the Aurora Avenue 145th to 165th project.

During the planning process over the past three years, various concepts for lane use were considered for the outside lanes that could be added to Aurora Avenue. Carpool use of the outside, right-turn lanes was evaluated. The community and City decided against opening the lanes to carpools. The primary use of the lanes is for safe access into and out of properties and businesses, along with providing traffic capacity at intersections with side-streets through provision of right-turn access. Allowing carpools would potentially add a large number of vehicles that would conflict with the vehicles that are attempting to access properties/businesses and side-streets. It would also be difficult to enforce carpool use of the lanes because of the combination of different types of users of the outside lanes.

Other considerations are that with the BAT lane included in the build alternatives, the lane is considered an auxiliary lane, and can be included as part of a "clear zone" for lateral obstructions. Therefore lateral obstructions such as signs and utilities won't have to be

located outside the right-of-way, and onto private properties. Another consideration is the design for bus zones. If carpools were allowed in the outside lanes, WSDOT would likely require bus turnouts at bus zones. Bus turnouts would cost a substantial amount of money to construct, and extra right-of-way would be required from businesses on the far side of intersections. These locations are often high value businesses, and this encroachment would cause impacts to these sites. Bus turnouts also cause delays to buses trying to re-enter the traffic lanes, so would be counter-productive to City goals to improve transit performance and use along Aurora Avenue.

**Response ID: 77      Safety and capacity comparisons**

***Responds to Comment: T-31***

Refer to Response ID 64. The concept referred to in this comment includes retention of a two-way, left-turn lane. That feature makes that concept much less safe than alternatives with safety improvement such as raised medians with focused left turns. Therefore, this concept does not meet the purpose and need for the project. Other features of that concept have been included in some or all of the build alternatives. According to WSDOT, the project would require a median separator. "Alternative C" therefore, is not a "build" alternative.

**Response ID: 78      Pedestrian safety**

***Responds to Comments: T-33, 64-41***

All of the build alternatives provide some level of pedestrian safety improvements that would make the corridor safer for pedestrians. Pedestrian safety improvements along the corridor include continuous sidewalks; pedestrian-scaled lighting; and improved pedestrian crossings, such as signalized street crossings and median refuge islands at all pedestrian crossings.

The overall benefit of the proposed improvements to pedestrian safety is elevating motorists' and pedestrians' awareness of each other. Currently, the lack of sidewalks along the roadway makes it possible for motorists to start merging into the pedestrian area prior to making a turn into a parking lot. With the installation of sidewalks, motorists will not be able to do this, eliminating the opportunity for pedestrians to be caught unaware from motorists behind them. The pedestrian-scale lighting will make pedestrians more visible to motorists during dark periods. The increased number of signalized street crossings and the pedestrian-actuated signals will encourage pedestrians to cross at appropriate locations rather than sprint across the street when there is an apparent break in the traffic. In addition, left-turning vehicles will be limited to intersections where pedestrians will be able to clearly see them and anticipate their movements.

The primary purpose of the median is to provide a safe refuge area along the center of the roadway for vehicles making focused left-turns and u-turns and for pedestrians crossing the roadway.

**Response ID: 79      Two-way left-turn lane on 15<sup>th</sup> Avenue NE**

***Responds to Comment: T-36***

For some roadway alignments two-way left-turn lanes may be appropriate especially those that have only one through lane in each direction. 15th Avenue NE has substantially lower

traffic volumes than Aurora Avenue N and would have two fewer lanes in each direction. Lower traffic volume and fewer conflict points means that it is less dangerous for vehicles to use a two-way left-turn lane.

**Response ID: 80      East/west traffic**

***Responds to Comments: T-38, 38-35, 64-14, A-12-1***

The transportation impact analyses address all traffic circulation along the Aurora Avenue 145th to 165th project, including traffic on east/west streets. Intersection Level of Service measurements for signalized intersections are intended to evaluate the overall service provided at an intersection. So, this measure not only evaluates service for vehicles on through-lanes along Aurora Avenue, but also lanes approaching Aurora Avenue from side streets (east-west traffic). Level of Service measurements for unsignalized intersections evaluate service provided by the stop-controlled approaches at the intersection (in the case of Aurora Avenue, the minor side street approaches). Reasonable and safe access onto Aurora Avenue is important because side streets provide access from adjacent businesses and neighborhoods.

The Proposed Action includes additional traffic capacity on east-west streets at approaches to intersections with Aurora. The benefit to traffic operations, versus the “No Action” Alternative, are reflected in the document. East-west traffic access to and across Aurora would be dramatically improved at three out of the five intersections within the project limits. The LOS data presented in Table 1 of the FONSI show results for both signalized and unsignalized intersections. The LOS for the signalized intersections at N. 155<sup>th</sup> Street and N. 160<sup>th</sup> Street are improved for the Proposed Action in comparison to the No Action Alternative (28 second delay versus 47 second delay at 160<sup>th</sup> Street). The LOS at N. 145<sup>th</sup> Street would be worse for the Proposed Action in comparison to the No Action Alternative (127 second delay versus 119 second delay). Without traffic signals at North 152nd Street and North 165th Street, vehicles attempting to enter Aurora Avenue would be required to wait for a gap in traffic rather than have one provided by a signal. Without the signal providing these gaps at a minimum time interval, gaps may not occur for several minutes causing delay to the approaching vehicles.

Access across Aurora Avenue, as well as movement along the corridor, is addressed in all of the “build” alternatives. Improvements are provided in the form of additional turn lanes at intersections. This allows more opportunities to traverse Aurora Avenue in a signal-controlled situation, which is safer and more efficient. Future traffic increases that would occur on parallel arterials would be accommodated on Aurora Avenue through the construction of any of the build alternatives.

The project would provide additional capacity in the corridor, thereby reducing the delay experienced by vehicles traveling in that corridor. Less delay would mean higher travel speeds, less idling time at intersections and a reduction in CO emissions. Although completion of the project would have a beneficial impact overall and would not result in an overall increase in traffic volumes within the project area, completion of the project may redistribute traffic at intersections. The three highest-volume intersections were studied (Aurora Avenue at North 145<sup>th</sup>, 155<sup>th</sup>, and 160<sup>th</sup> Streets) for localized CO impacts. All three had lower CO concentrations with the Proposed Action in 2020 compared with existing conditions. However, because of the additional capacity provided at intersections, CO

concentrations with the Proposed Action were higher than conditions under the No Action scenario in the year 2020.

Also, note that the median would vary in width but would never be wider than fifteen feet.

**Response ID: 81      Connection to Seattle and Edmonds**

***Responds to Comment: T-40***

Please see Response ID 27. Also, this project's northern terminus is at North 165<sup>th</sup> Street, therefore a connection to Edmonds is not relevant to this project. The Aurora Avenue North 165-205 Project would need to transition efficiently to the City of Edmonds.

**Response ID: 82      Economic cumulative impacts**

***Responds to Comments: T-43, 50-28, 64-40***

The 25 businesses referenced in the comments are impacted by other projects and not the Aurora Avenue 145th to 165th project. This economic impact (displacement) has been identified as a part of the cumulative impacts section of the EA/DEIS which considers the net impact of reasonably foreseeable projects, including the Aurora Avenue 165th to 205th project. Each of these businesses could be identified in specific detail, however it would not aid in the decision among the alternatives offered for the Aurora Avenue 145th to 165th project.

The Aurora Avenue 165th to 205th project will have an environmental analysis that will look at detailed impacts to businesses from proposed project-level alternatives. At this time, no alternatives have been developed for that project (aside from the conceptual "Alternative 2" from the Aurora Pre-Design Study), therefore only this single conceptual design has been studied for the purposes of identifying cumulative impacts. This conceptual design alternative, for the EA/DEIS analysis, centered the roadway with current right-of-way. The environmental analysis and design process for Aurora Avenue 165th to 205th project will examine the potential to shift the roadway to minimize impacts to private property and right-of-way as well as other mitigating design options. No preferred alternative has been developed for the Aurora Avenue North 165th to 205th project.

Alternatives A and B in the EA/DEIS are only for the Aurora Avenue 165th to 205th project. Alternative A Modified was developed based on public input and the value engineering study and is the Proposed Action in the FONSI. These three designs may or may not be included as a part of the Aurora Avenue 165th to 205th project. The project covering Aurora Avenue North from North 165th Street to North 205th Street will undergo its own separate scoping process to develop alternatives and subsequent design and cost estimates.

**Response ID: 83      Public Involvement**

***Responds to Comments: T-44, T-47, T-69, T-74, T-77, T-111, 27-6, 37-27, 50-41, 52-1, 63-36, 63-40, 64-8, 64-77***

Chapter 4 of the EA/DEIS has a complete discussion of agency coordination and the community involvement efforts to date. It outlines all of the ways that businesses and property owners were consulted as a part of this project. The following provides highlights of the public involvement opportunities during the alternatives development process and describes meetings held specifically with property and business owners.

The City and its consultant team took the concerns expressed by property owners and businesses into account throughout development of the alternatives and preparation of the environmental documentation as recommended by WSDOT's "A Primer for Local Agencies on Access Management in Washington State" and NEPA and SEPA guidelines. The proposed project is the outgrowth of planning efforts undertaken since incorporation of the City in August 1995. Development of design alternatives began during the pre-design process, which included the involvement of the Citizen's Advisory Task Force (CATF) and the Interagency Technical Advisory Committee (ITAC). (Please also see Response ID 58 for information on the CATF membership. The five business owners/tenants representing businesses along Aurora included: Chuck Olson [Chuck Olson Chevrolet], Marilyn Santana [Manager of Sears], Bill MacCully [Minuteman Press], Harley O'Neil [Royal Property Management, commercial property owner], Pup-Shin Park [Highland Pharmacy]. Sears is the only business located in the Aurora 145th-165th project area) The initial design alternatives were developed by CATF and ITAC agreeing on elements that could be assumed for any alternative. During the pre-design phase, the public had the opportunity to comment on the pre-design work at over 60 public meetings (citywide open houses, planning commission, city council, CATF meetings, ITAC meetings, and various community organizations). More than 20 articles and advertisements appeared in the local media, including several articles in local Korean/Asian periodicals and three citywide mailings/newsletters were distributed. Members of the CATF also went door-to-door to inform businesses of upcoming meetings.

Following the pre-design process, the City continued its public involvement process into the preliminary engineering phase. The public outreach activities included open houses, small group meetings with property and business owners, City Council meetings, and Citywide mailings, which continued to inform interested parties about the development of design alternatives and to request participation in the process. Four open houses, two property/business owner "block meetings," over 50 individual property/business owner meetings, and approximately six City Council meetings were held regarding development of the project design and alternatives from May 2000 to February 2001. These meetings occurred more than 4 months prior to August 2, 2001, when the City of Shoreline issued a Scoping Notice that identified the proposed alternatives to be studied in the EIS as well as environmentally important issues. Respondents were invited to suggest new alternatives. The EA/DEIS was issued in July 2002, approximately 10 months following the close of the scoping comment period, which provided ample time to take scoping comments into consideration.

Specific opportunities for property and business owners to express their desires and concerns were provided during two "block" meetings (North 145th Street to North 155th Street and North 155th Street to North 165th Street) and one-to-one meetings. The block meetings were held by the City and its consultants on October 25 and October 26, 2000. These informational meetings discussed the potential effects of the project, such as property interface and access issues and needs as well as potential right-of-way and right-of-entry requirements for construction. The goal was to develop workable solutions endorsed by the City, property owners, and businesses. Notices of the meetings were mailed and hand delivered. The City produced Korean language translations of fliers to assist Korean business community members with their understanding of the project and the issues

discussed at the meetings. A Korean translator also attended the block meeting where most Korean businesses are located.

Between October 2000 and February 2001, the City made direct contact with 42 of the 45 property owners between 145th Street and 165th Street, and held meetings with 37 of the property owners. Five of the 42 did not want to meet because they typically did not feel the proposed project would affect their property. All of the approximate 90 businesses from North 145th Street to North 165th Street were contacted with fliers and telephone calls. These contacts resulted in the City meeting with 26 business owners representing 28 businesses. These individual meetings were used by the City and its consultant team to present progress on the project and to answer questions and hear concerns in depth.

It is unfortunate that a property/business owner did not feel his opinion was taken into account by the CATF. The City and its consultants appreciate his taking the opportunity to express his opinions again at the public hearing on the EA/DEIS.

**Response ID: 84      Conflict of interest**

***Responds to Comments: T-46, 37-36, 64-5***

CH2M HILL, the consultant under agreement with the City of Shoreline, prepared the preliminary design and environmental analysis for the proposed action. The preliminary design was required to determine the footprint of the build alternatives and the No Action Alternative. The impacts associated with each alternative could then be disclosed and mitigation measures discussed in the environmental documentation. Discipline reports are almost always prepared by the same team that prepares an EA or an EIS, because these reports are the detailed analyses that are completed by element of the environment to prepare the more concise environmental consequences sections of an EA or EIS.

The consultant is under agreement to complete the environmental and preliminary design phase of the proposed action. They have no decision making authority in the environmental process. The consultant is not required to execute a disclosure statement as suggested by the comment, and no conflict of interest has been identified.

The oversight being exercised by the co-lead agencies (FHWA, WSDOT, and the City of Shoreline) has been sufficient to eliminate any perceived conflict of interest. Through their substantial supervision and oversight, FHWA and WSDOT control the accuracy and scope of the NEPA process and the content of the NEPA documents and that they independently and objectively evaluate the consultant's work.

It should also be noted that the document under comment is a NEPA Environmental Assessment (EA) not a NEPA Environmental Impact Statement per 40 C.F.R. Part 1506.5(c) as cited by Comment 37-36.

**Response ID: 85      Access Management**

***Responds to Comment: T-48, 61-54***

Page 1-3 in the EA/DEIS included a brief reference to Revised Code of Washington 47.50 and is not intended to include every word in that code.

The purpose of WAC 468-52 is for the implementation of an access control classification system for the regulation and control of vehicular ingress and egress from the state highway

system. Roadway design for state highways must also comply with WSDOT Design Policy and Standards, including the WSDOT Design Manual. Under WAC 468-52 for a Class IV facility, a “non-restrictive median” such as a two-way left turn lane is allowed. However, WSDOT Design Policy does not allow for a two-way left-turn lane on a state highway with more than two lanes in each direction (WSDOT Design Manual 910.07). For highways that meet this criteria, WSDOT’s Design Manual Chapter 910 stipulates, “The desirable length of a TWLTL is not less than 250 feet.” Alternative A (with the fewest openings in the median) proposes intersection openings at North 145th, 149th, 152nd, 155th, 160th, and 165th Streets. The spacing of these intersection openings leaves little room for two-way left-turn lanes even if safety implications of operating such a roadway are ignored. In addition, WAC 468-52 restricts use of two-way left-turn lanes when traffic volumes are over 25,000 ADT for a Class 3 facility. This is because traffic safety data has demonstrated a substantial increase in accidents on roadways with high traffic volumes (over 25,000 ADT) without adequate access safety features including a raised median. A current example of this in close proximity to Shoreline’s boundary is on Aurora Avenue in Seattle between North 115th and N 145th Streets. The City of Seattle is evaluating the installation of raised medians in this area because of the high number/severity of collisions. Although Shoreline’s Aurora Avenue is classified as Class 4, the project area has traffic volumes considerably higher than this threshold of 25,000 ADT, and all of the build alternatives plan three lanes in both directions. Because of this, WSDOT is requiring for the build alternatives, the installation of raised medians to mitigate turning, weaving, and crossing conflicts, as stated in the referred section of the document.

**Response ID: 86      Speed limit**

***Responds to Comments: T-49, T-82, 38-8, 50-9, 61-76, 63-18, 64-51, 64-72, A-7-1***

The current signed speed limit on this portion of Aurora Avenue is 40 miles per hour. The CATF and members of the public, including the SMA, have expressed the preference to reduce the speed limit to 35 miles per hour. Some members of the public have expressed the preference to increase the speed limit. The City supports the reduction of the posted speed limit on Aurora Avenue. Regarding access management classifications, Aurora Avenue has a Class 4 designation, so the design should be generally capable of achieving a posted speed limit of 30-to-35 miles per hour. It is currently not a part of the Aurora Avenue 145th to 165th Project to change the speed limit within the project area. WSDOT will review the posted speed limit based upon the results of free flow spot speed studies. After completion of the project, the City may request WSDOT conduct an evaluation to determine whether the reduction of the posted speed limit is appropriate.

The Secretary of Transportation has authority on setting or approving speed limits in accordance with RCW 46-61.400. Setting or changing speed limits on state highways requires appropriate engineering and traffic investigation, as described in the WSDOT Traffic Manual, Section 6.3, including a speed study, analysis of the highway geometry, and accident history. The speed limit is based on actual vehicular speed (85<sup>th</sup> percentile speed), rather than regulatory code. WSDOT maintains that motorists become accustomed to driving the posted speed limit and by arbitrarily reducing that posted speed, the majority of motorists will end up routinely violating the legal speed limit. The reduced posted speed will not encourage voluntary compliance, and may in fact cause more erratic driver behavior and increased safety hazards between vehicles and pedestrians.

WAC 468-52-040 does not establish the speed limit for state facilities. Speed limit is established by RCW and the Secretary of Transportation and is based on traffic analysis. The purpose of WAC 468-52 is for the implementation of an access control classification system for the regulation and control of vehicular ingress and egress from the state highway system. In referring to the speed limit for a Class 4 facility, WAC 468-52-0400 states, "It is the intent that the design be generally capable of achieving a posted speed limit of thirty to thirty five mph in urbanized areas."

WAC 468-52-040 defines the access control classification system and standards. Shoreline's section of SR 99 is designated as Class 4 Access. Class 4 reads in part, "Highways in this class are typically distinguished by existing or planned nonrestrictive medians. Restrictive medians may be used as operational conditions warrant to mitigate turning, weaving, and crossing conflicts." This regulation suggests that Class 4 highways do include nonrestrictive medians, including two-way-left-turn lanes. However, rejection of two-way-left-turn lanes (nonrestrictive medians) as a continuous part of the design cross-section for the alternatives is based upon the WAC 468 along with consideration of other design guidance, and the operational considerations of this particular roadway under the future design conditions.

**Response ID: 87      Cut-through traffic**

***Responds to Comments: 5-4, 27-19, 61-20, 61-27, 61-86, 61-92, 63-34, 64-64, A-7-2***

Table 2 in Attachment 3 of the FONSI shows the results of the traffic modeling for peak hour travel on Aurora Avenue North and other north-south arterials. Compared to the "No Action" Alternative, the Proposed Action projects an increase in vehicle trips on Aurora Avenue North while projecting fewer trips on Greenwood, Dayton, Ashworth, and Meridian Avenues. These trips were projected using the City's EMME/2 travel demand model; a model commonly used by transportation planners.

In order to ensure that neighborhoods adjacent to the proposed project are not affected by cut-through traffic, the City proposes immediate and continuous implementation of its Neighborhood Traffic Safety Program. This is an ongoing program paid for through the City's Road Capital Fund. The City has started conducting traffic counts and traffic speed measurements on adjacent streets. During construction and after the project is completed, the City will continue to monitor traffic conditions on neighborhood streets. If traffic conditions on the neighborhood streets warrant action, the City would work with neighborhoods to implement neighborhood traffic and control measures.

Traffic flow would be affected during construction. See Response ID 26 for an additional discussion about construction traffic. Also see Response ID 33 for information regarding traffic near neighborhoods at North 165th Street. The proposed traffic signal at North 165th Street would allow those people who live in adjacent neighborhoods to safely get onto Aurora Avenue. The signal would also provide a "protected" u-turn for north/south traffic on Aurora Avenue, in addition to allowing pedestrians to safely cross Aurora Avenue.

**Response ID: 88      Businesses in the corridor**

***Responds to Comment: T-51***

The number of businesses reported in the EA/DEIS reflected the number of parcels. At the time of the analysis, there were 86 businesses occupying the 52 parcels along the 145th to 165th Street corridor.



***Responds to Comments: T-53, 37-15, 64-11, 64-60***

Chapter 1 in the EA/DEIS discusses the purpose and need of the project. This is a formal description of the transportation-related needs that the project is intended to fill and its purpose for implementation. It is organized in order of importance, with safety being the primary need. The purpose of the project is to improve the safety of all users on Aurora Avenue from North 145<sup>th</sup> Street to North 165<sup>th</sup> Street with improved channelization, access management, and pedestrian amenities, and to improve multimodal mobility. The need is related to issues of safety, social demands, and local and regional transportation such as corridor capacity, transit amenities, and system linkages. The statement of “goals and objectives” is a reflection of what the City would like the Aurora Avenue 145<sup>th</sup> to 165<sup>th</sup> project to accomplish beyond serving only capacity and safety for automobiles and trucks. The City has established a vision for a Aurora Avenue in its Comprehensive Plan that includes transit-oriented land uses served by multiple modes of transportation. This project helps to support the Comprehensive Plan.

This project will not force small and family-owned businesses out of town. Adverse impacts to businesses such as less direct access and parking loss are anticipated to be offset by the inclusion of protected left- and u-turn pockets, increases in mobility and exposure to a larger customer base, and improvements to traffic and pedestrian safety and to the roadway and road edge appearance. Some of the lost parking stalls can be mitigated by restriping and realigning parking areas. All businesses will have an adequate number of parking stalls in accordance with City code.

**Response ID: 89      Goals and objectives**

***Responds to Comments: T-53, 37-15, 64-11, 64-60***

Chapter 1 in the EA/DEIS discusses the purpose and need of the project. This is a formal description of the transportation-related needs that the project is intended to fill and its purpose for implementation. It is organized in order of importance, with safety being the primary need. The purpose of the project is to improve the safety of all users on Aurora Avenue from North 145<sup>th</sup> Street to North 165<sup>th</sup> Street with improved channelization, access management, and pedestrian amenities, and to improve multimodal mobility. The need is related to issues of safety, social demands, and local and regional transportation such as corridor capacity, transit amenities, and system linkages. The statement of “goals and objectives” is a reflection of what the City would like the Aurora Avenue 145<sup>th</sup> to 165<sup>th</sup> project to accomplish beyond serving only capacity and safety for automobiles and trucks. The City has established a vision for a Aurora Avenue in its Comprehensive Plan that includes transit-oriented land uses served by multiple modes of transportation. This project helps to support the Comprehensive Plan.

This project will not force small and family-owned businesses out of town. Adverse impacts to businesses such as less direct access and parking loss are anticipated to be offset by the inclusion of protected left- and u-turn pockets, increases in mobility and exposure to a larger customer base, and improvements to traffic and pedestrian safety and to the roadway and road edge appearance. Some of the lost parking stalls can be mitigated by restriping and realigning parking areas. All businesses will have an adequate number of parking stalls in accordance with City code.

**Response ID: 90      Discipline report availability**

***Responds to Comments: T-54, 37-2, 56-3, 64-16, 64-78, 64-94***

It is true that the discipline studies were not included in the EA/DEIS, nor does NEPA or SEPA require them to be a part of that document. NEPA and SEPA do require conciseness in document preparation. As a result, discipline studies are not typically included in an EA or DEIS unless they are critical or integral to explaining the impacts of the project (i.e. identify substantial impacts). Since the EA/DEIS did not identify any "significant" or "substantial" impacts, the studies were made available at the Shoreline City Hall, the WSDOT Dayton Office, and at the FHWA offices in Olympia on the same day (July 10, 2002) as the release date of the EA/DEIS. The discipline studies were available for viewing on-site or reproduction. This is consistent with typical procedure to make discipline studies available for public and agency review.

The City, WSDOT, and FHWA regret that members of the public had difficulty obtaining copies of the discipline studies. It was not the intention of the project team to withhold information from the public. Timothy Stewart, City of Shoreline, was available during the comment period for questions regarding the documents, in addition to Joyce Nichols. The City has taken the recommendation of a citizen, and has made the discipline studies available for public review at the public libraries located at 2402 NW 195th Place and 302 NW 175th Street in Shoreline.

**Response ID: 91      Cumulative stormwater impact**

***Responds to Comments: T-57, 27-17, 34-2, 37-7, 37-19, 55-3, 64-36***

Cumulative impacts were evaluated based on the estimated combined impacts of this project, the Aurora Avenue North 165th to 205th Project, the Interurban Trail, and the Pedestrian Safety Demonstration project. Using available design information, increases and/or decreases in impervious surfaces were calculated for each of the affected basins. Assumptions on potential future stormwater facilities for the Interurban Trail and Aurora Avenue North 165th to -205th were made based on the fact that those projects would be required to meet the stormwater and erosion control requirements of the City and of the Endangered Species Act. Because the design of stormwater facilities for these projects would be guided by these regulations, the stormwater-related cumulative impacts of these projects were judged to be minimal and potentially beneficial.

This project is required to detain stormwater runoff from 100 percent of the net new impervious surfaces it creates and treat stormwater the new and redeveloped pollutant-generating impervious surfaces. Project limits do not need to begin and end with basin boundaries for stormwater control to be effective. This project has stormwater flows to three basins (Boeing Creek, Thornton Creek, and West Lake Washington) ; increases and decreases in impervious surfaces have been calculated for each basin and stormwater facilities have been planned based on those calculations. This project would not divert stormwater from one basin to another. Please refer to the EA/DEIS for more information regarding basin boundaries and the existing storm drain system. Also refer to the discussion contained within Response ID 45 for more information.

The 3rd NW Drainage Project will not direct additional water to Boeing Creek. The expansion of the drainage pond at this location will increase the amount of water that can be held before it enters the creek. The City will be modeling future stormwater flows in order

to adequately set the outgoing flow rate at this location to help erosion problems in Boeing Creek.

**Response ID: 92      Best Management Practices**

***Responds to Comment: T-60***

The Aurora Corridor project is following Best Management Practices (BMPs) described in King County Stormwater Design Manual (KCSWDM), Ecology's Stormwater Management Manual for Western Washington (SMMWW), and WSDOT Highway Runoff Manual. These BMPs are designed to protect water resources within the county and the state. Stormwater BMPs fall into two categories: temporary erosion control and permanent. Both are required to reduce the impacts of development on the receiving water bodies. New and emerging technologies for BMPs as described in the SWDM and the SMMWW will be used where appropriate for this project.

There is currently no water quality treatment or detention of stormwater flows generated from the footprint of Aurora Avenue from 145th to 165th Streets. Under the proposed project design, stormwater runoff would from the new, replaced and existing pollutant-generating impervious surfaces will be routed through a series of stormwater treatment devices. These permanent BMPs would address the requirements of the KCSWDM (i.e., target removal of approximately 80 percent of the total suspended solids on an annual basis). Temporary erosion control BMPs would include the use of construction-related BMPs, such as silt fences, erosion control blankets, storm drain protection inserts, temporary seeding of sideslopes, vegetation protection, and using new technologies in removing turbidity from stormwater, such as electrocoagulation and filtration. A stormwater pollution prevention plan would be prepared as part of the final project design that meets the requirements of the State Department of Ecology's NPDES general permit for construction activities. These are the BMPs that are necessary for the project to be approved by regulatory agencies.

The BMPs discussed in the "Sound Waves" article (Fall 2001 issue, published by the Puget Sound Water Quality Action Team) are new and emerging low-impact development techniques to manage stormwater runoff. Some of these types of BMPs are being used by the Aurora Corridor Project, and are discussed in Response ID 93.

**Response ID: 93      Low-impact technology**

***Responds to Comments: T-61, 64t-7***

The Aurora Corridor Project is already implementing low-impact environmental strategies while balancing traffic impacts within the roadway network. Roadway recommendations have been developed that incorporate environmentally sensitive solutions. These solutions minimize or reduce new impervious surfaces, reduces the amount of pollutant-generating impervious surfaces, promote safety and accessibility for pedestrians and bicyclists, allow citizens to access transit facilities, and create an enjoyable area for residents and others to use. The three build alternatives include "low-impact" features of vegetated strips along the sidewalks (for Alternative A and A Modified), and center medians that would have grass, trees and shrubs to help infiltrate and absorb rainwater.

The reduction of impervious surface is one of the best ways to reduce stormwater runoff. In roadway projects, this typically means the removal of concrete and asphalt. Of particular

concern is the amount of pollutant-generating impervious surface that is in the corridor. Replacing impervious surface with pervious cover, such as planter strips or landscaped median, reduces stormwater runoff.

A secondary strategy related to pavement reduction is changing the usage of pavement. Transferring the use of impervious surfaces, for example changing a general purpose lane for cars into a sidewalk for pedestrians, can also have beneficial stormwater implications. Pollutant-generating surfaces such as road lanes require treatment of stormwater runoff flows. Sidewalks are considered a non pollutant-generating surface because people and bicycles do not leave a trail of pollutants as cars do. Non pollutant-generating surfaces therefore do not need to have their runoff treated. Although non pollutant-generating surfaces are still impervious and produce runoff, they do not require treatment facilities; reducing the amount of space needed to control stormwater flows. For the Aurora Corridor Project, the three “build” alternatives would all result in a reduction in the amount of pollutant-generating impervious surfaces.

Additional low impact development technology was considered for the project, such as using the center median for detention and treatment, but was not feasible as discussed below. In order to use parts of the center median as a biofiltration swale, the roadway would need to be sloped towards the center to allow drainage to enter the median. Since the center median is only 14 feet wide at a few places, and there would not be enough storage volume in the medians to detain the required flows for all the roadway runoff, or enough detention time to meet the biofiltration swale requirements set forth in the SWDM. Therefore, additional detention and treatment facilities would be required for the project.

**Response ID: 94      Roadway contaminants**

***Responds to Comments: T-62, 55-8, 64-34***

The oil/water separators planned for the specific “high-use” intersections (145<sup>th</sup> and 155<sup>th</sup>) in the project are more than just “Ts” – they are engineered systems designed to separate free oils from the stormwater. As long as the oils have not become chemically or mechanically emulsified, these separators would remove the oils to the design criteria performance concentrations. These devices are not designed to handle very dilute concentrations, and are most effectively used near the potential sources of the highest concentrations of contaminants (i.e. high-use intersections, where the majority of accidents and leaks occur), instead of downstream in the system where the gas and oils become extremely dilute. Small leaks along the roadway (and any roadway for that matter) would always occur, but these would be diluted prior to entering into the streams by the large quantities of stormwater during rain events.

In order to remove dissolved oils and antifreeze (which is readily soluble in water) from the stormwater, advanced physical or chemical treatment units (such as in industrial wastewater applications) would have to be used, and are not applicable for general highway runoff treatment systems. Standard BMPs as well as the new emerging technology BMPs would not effectively remove these contaminants. Stormwater ponds with long retention times may possibly provide some level of treatment of antifreeze and gasoline via aerobic decomposition, assuming the appropriate microorganisms are present in large enough quantities to make a difference. However, if the contaminants discussed in the comment come primarily from automotive accidents or large spills where large quantities of the

pollutants may reach the storm drainage system, a spill response program would take care of removing the contaminants from the streets and prevent them from entering the waterways. Such quantities of pollutants would most likely not be fully removed by any of the available BMPs.

Regarding the use of herbicides and pesticides, the City contracts with the County for vegetation maintenance. The County work crews use the standards established for the King County Integrated Pest Management Program. Typically, the City avoids use of chemicals along paved roadsides, reserving their use for problem areas only. However, chemicals and pesticides, like other pollutant runoff from roadways such as oil and grease, would be treated by the project's surface water facilities.

**Response ID: 95      Permeable pavers**

***Responds to Comment: T-63***

The amenity zone is mostly a vegetated strip, which would enable some absorption and infiltration of stormwater. Permeable pavers that promote infiltration may be used for the sidewalk areas, but the infiltration in the area would be minimal, and there would still be runoff going into the streets (due to the fact that the subsurface soils types in the area do not promote much infiltration).

**Response ID: 96      Costs in EIS**

***Responds to Comments: T-104, 32-10, 37-34***

Neither SEPA, WAC 197-11-440 (EIS Contents), nor NEPA, Section 1502.14 of the Council for Environmental Quality's Regulations for Implement NEPA, require that the construction cost of a proposed action be analyzed in an environmental document. The costs of the alternatives were not presented in the EA/DEIS. Based on the design of the Propose Action, the current cost estimate for the project is \$19.6 million. This cost estimate is a 30-percent design level estimate, which includes a substantial factor for contingency, uncertainty and risk

The City's 2004-2009 Proposed Capital Improvement Plan includes a budget of approximately \$59.8 million for the improvements to Aurora Avenue North from North 165th Street to North 185th Street.

**Response ID: 97      Median impacts**

***Responds to Comments: T-72, T-73, 37-14, 63-42, 63-48, 64-12, 64-21, 64j-1, 64n-2, 64o-2, 64q-1***

The effects of medians are discussed throughout Chapter 3 in the EA/DEIS and Attachment 3 of the FONSI including their effect on transportation, economics, and stormwater.

Comment 63-48 points out some possible disadvantages for raised, non-traversable medians, such as: time and delay experienced by some left-turning traffic; undesirable turning movements (u-turns with insufficient width); unwanted travel patterns (traffic entering neighborhoods); and concerns regarding high-speed vehicles hitting the median. These concerns are addressed in the EA/DEIS and will be mitigated in the design of the improvements. These concerns are also discussed further in the text that follows in this response. It should be noted that these disadvantages are more than offset by the advantages that are noted for raised medians in Exhibit 19 attached to the comment: "The primary advantage of a raised median is that left-turning traffic can be concentrated at

established median openings. Raised medians have been found to reduce crashes 25-to-40 percent, depending on traffic volumes. This makes it easier to regulate crossing traffic. In addition, raised medians can be used to provide a refuge area for pedestrians crossing the roadway.”

Raised non-traversable medians remove conflict points from the roadway and focus access to where it is most needed and can be provided more safely with traffic control. As a result, some turning movements that would be made mid-block without the proposed action would be made at median openings and at intersections. Under the Proposed Action u-turns and left-turns would be available for northbound and southbound traffic at each signalized intersection (145<sup>th</sup>, 152<sup>nd</sup>, 155<sup>th</sup>, 160<sup>th</sup>, and 165<sup>th</sup> Streets ) as well as midblock near 163<sup>rd</sup> Street and at two locations between 152<sup>nd</sup> Street and 145<sup>th</sup> Street (see Figure 3 in the FONSI). with the proposed action. The impacts of these shifts were accounted for in the traffic analysis.

Research by the National Academies of Science Transportation Research Board (TRB), the Federal Highway Administration (FHWA), and Washington State Department of Transportation supports the effectiveness of access management treatments (including raised medians) to achieve improvement of safety and operational characteristics of the roadway.

Installation of the median may make access to some businesses less direct. Some businesses that rely on impulse purchases may experience a negative impact on revenues as potential customers are unable to make left-turns directly into the parking lot. However, in a paper by Kristine M. Williams, AICP, entitled “Economic Impacts of Access Management” (Center for Urban Transportation Research, 2000), the author reviewed recent studies on the business impacts of raised medians and concluded that the installation of medians has little overall adverse business impacts.

The results of an extensive comparative evaluation of crash rates on roadways with two-way-left-turn lanes versus raised medians were presented in NCHRP Report 420: Impacts of Access Management Techniques, TRB, 1999. That evaluation found that the average crash rate on the roadways with a raised median is 30 percent less than those with a two-way-left-turn lane. None of the research over the past 20 years show that two-way-left-turn lanes for a roadway with six lanes, 40,000 vehicles per weekday, and a 40 miles per hour speed limit would have lower accident rates than access management treatments which include a center raised median. Some of the research covers projects with longer distances between left/u-turn opportunities than the distances provided by the proposed action. When the distances between left/u-turn opportunities are longer, the convenience of access to businesses is reduced while overall traffic safety is likely improved because the frequency of conflicting traffic movements is lower. However, the intent for all of the access management projects was the same: to reduce the number of conflicting traffic movements and to focus conflicting/turning movements at fewer locations. For the Aurora Avenue 145<sup>th</sup> to 165<sup>th</sup> project, business owners have been concerned that opportunities for left/u-turns be provided so that their customers can easily access their businesses. The increased frequency for left/u-turns in the proposed action has been included to respond to the concerns of business owners. Most of the left/u-turn movements for proposed action would occur at traffic signals and would have signal controlled protection. The more frequent the left/u-turn locations, the higher the potential for traffic conflicts and traffic crashes. However, note that recent research indicates that a right turn followed by a u-turn is safer than a direct left

turn from a driveway (see: Lu, et. al., *Safety Evaluation of Right-Turns Followed by U-Turns as an Alternative to Direct Left Turns-Conflict Analysis*. Report for the Florida Department of Transportation, June 2001; and Zhou, et. al , *A Safety Comparison of Right-Turns Followed by U-Turns as an Alternative to Direct Left Turns from Driveways or Sidestreets*. Center for Urban Transportation Research, University of south Florida, June, 2001.)

The alternatives considered in the EA/DEIS provide adequate u-turn width for passenger vehicles as well as pick-up and delivery trucks.

The design for the improvements will account for traffic at 40 miles per hour, and will be developed to comply with design guidelines and standards. WSDOT will review and approve the design prior to implementation. Special measures will be taken to address traffic accident risks relating to the raised median and also to roadside features outside of the street. Relating to concerns expressed in Comment 63-48 regarding “a raised median could cause the driver to lose control of the vehicle,” this situation would be much worse with a two-way-left-turn lane. With a two-way-left-turn lane, the driver would instead hit an on-coming vehicle head on while traveling at 40 miles per hour, rather than glancing off a 6-inch-high curb.

Installation of the median may also make access to some businesses less direct. Some businesses that rely on impulse purchases may experience an impact on revenues as potential customers are unable to make left-turns directly into the parking lot. However, in a paper by Kristine M. Williams, AICP, entitled “Economic Impacts of Access Management” (Center for Urban Transportation Research, 2000), the author reviewed recent studies on the business impacts of raised medians and concluded that the installation of medians has little overall adverse business impacts.

The City of Shoreline acknowledges the potential for diversion into neighborhoods and would address possible traffic diversion as a result of the Aurora Avenue improvements. See Response ID 26 for discussion of City Neighborhood Traffic Management Program.

**Response ID: 98      Project advertising**

***Responds to Comment: T-79***

The Scoping Notice for this project, Notice of Availability, and Notice of Public Hearing were each published in the Seattle Times newspaper. The Seattle Times has a circulation throughout the Puget Sound area as well as the Cities of Seattle and Shoreline. Also, several public meetings regarding potential improvements to Aurora from the Battery Street Tunnel to North 145<sup>th</sup> Street have been conducted over the past year. At those meetings, displays were included about the Shoreline Aurora Avenue 145<sup>th</sup> to 165<sup>th</sup> project.

In addition, staff at the City of Seattle have been consulted on this project and have reviewed and commented on the EA/DEIS.

**Response ID: 99      Air quality impact**

***Responds to Comments: 37-35***

Table 7 and 8 in the Air Quality section of Attachment 3 in the FONSI shows that air quality would be worse at the North 155<sup>th</sup> Street intersection in the year 2020 compared to the “No Action” Alternative, but better than existing conditions. This is because there would be additional capacity at this intersection compared to present conditions. Congestion would

not increase in the Aurora corridor, but traffic volumes would, due to regional and local population growth. As such, building a project designed to accommodate these volumes assures that more cars would use Aurora Avenue. The traffic impact analysis and air quality analysis are valid.

**Response ID: 100      Capacity reduction**

***Responds to Comments: T-83, 60-8***

The current alignment of Aurora Avenue North from N 145th Street to N 165th Street is two general purpose lanes in each direction and an unrestricted two-way left-turn lane. All of the proposed build alternatives in the EA/DEIS, as well as Alternative A Modified, add one Business Access and Transit (BAT) lane in each direction to the existing alignment (and also install a median with left-turn and u-turn pockets in place of the two-way left-turn lane). Therefore, there is no reduction in capacity in terms of lane reductions. Also, see Response ID 47 for more discussion regarding capacity.

**Response ID: 101      Add crosswalk at 152nd Street**

***Responds to Comment: T-85***

Traffic Engineering best practices discourage painting crosswalks in an unprotected location on a street with as many lanes and traffic volumes as Aurora Avenue. Crosswalks should be systematically developed with proper signing and illumination in order to provide a safer environment for pedestrians. Striping alone may give the impression to some pedestrians that they have a safe crossing and that they do not need to be concerned about finding reasonable gaps in traffic. The preferred alternative, Alternative A Modified, includes a signalized intersection at North 152nd Street, which will improve pedestrian safety by providing a signalized crossing.

**Response ID: 102      Clarify Alt B has a BAT lane, not HOV**

***Responds to Comment: T-88***

Both Alternative A and Alternative B featured in the EA/DEIS include Business Access and Transit lanes, as does Alternative A Modified. Neither alternative would have HOV lanes which can be used by carpool vehicles. The proposed Business Access and Transit (BAT) lanes would be used by right-turning traffic to adjacent properties and side streets and by transit vehicles. These lanes would allow safer traffic access at driveways to businesses by allowing vehicles to move out of through-lanes prior to making their right-turns into driveways and side streets.

**Response ID: 103      Accidents and air pollution**

***Responds to Comment: T-81, T-89***

This project would improve safety and therefore reduce the chances of accidents for both vehicles and pedestrians.

Congestion would not increase in the Aurora corridor, but traffic volumes would, due to regional and local population growth. As such, building a project designed to accommodate these volumes assures that more cars would use Aurora. However, traffic would flow better than under present conditions. The air quality analysis in this EA/DEIS demonstrates that carbon monoxide concentrations would improve at most locations over current conditions. Tables 7 and 8 in the FONSI (and tables 3-24 and 3-25 in the EA/DEIS) show that air quality



would be worse at the North 155<sup>th</sup> Street intersection in the year 2020 compared to the “No Action” Alternative. This is because there would be additional capacity at this intersection compared to present conditions.

**Response ID: 104      Thornton Creek Basin**

***Responds to Comment: T-92***

This project is primarily in the Boeing Creek Basin. Roughly five percent of this project is within the Thornton Creek Basin. As noted in the FONSI, the stormwater runoff volume discharged to Thornton Creek would increase by such a small amount that the flow-related impacts would be minimal and should not have a stormwater-volume-related impact on the aquatic habitat in Thornton Creek. The installation of the stormwater quality treatment facilities in the Thornton Creek basin might provide a slight improvement in the water quality of the receiving streams. However, the area of the proposed project within the Thornton Creek basin is so small relative to the total drainage area, the improvements are not expected to be discernible.

**Response ID: 105      Wildlife species**

***Responds to Comments: T-95, 37-17, 50-30***

Broadly speaking, the species identified in Comment T-95 (chinook, coho, sockeye, cut throat, rainbow, steelhead, river otter, great blue heron, beaver, muskrat, pileated woodpecker, redbtail hawk, bald eagle, peregrine falcon, sharp shin hawk, and barn owl) have the potential to exist in the vicinity of the project. Through multiple communications with various resource agencies and independent field surveys, it was concluded that the majority of these species do not reside within the Aurora Avenue Corridor project area. As such, the wildlife assessment focused on likely residents and seasonal use species within the project area, and the fish assessment focused on likely residents and seasonal use species within the Boeing Creek, Thornton Creek, and West Lake Washington (Densmore) Basins, including threatened and endangered species. The fish assessment did not consider impacts to McAleer Creek basin because the proposed project would not extend into that basin.

Currently, the stormwater from Aurora Avenue North enters Boeing Creek with peaking seasonal high flows that create erosion and sediment travel. Additionally, no water quality management strategies currently exist to treat stormwater from Aurora Avenue North. By design, this project would detain and treat stormwater to current (2002) regulatory standards, thus improving overall water quality as well as the aquatic habitat in Boeing Creek. Please see the Water Quality/Surface Water and Wildlife sections in Attachment 3 of the FONSI.

**Response ID: 106      Vegetation in median**

***Responds to Comments: T-100, 32-5, 36-6, 50-21, 50-32, 51-1, A-1-2, A-1-3, A-6-2, A-11-4, A-12-3***

Currently, the City has not received approval from WSDOT to plant trees in the median; trees would only be located in the amenity zone. Vegetation in the medians would be low-height to ensure that pedestrians and other traffic can be seen. The amenity zone would end short of each intersection so the vegetation would not block pedestrians waiting to cross at the crosswalks. Medians would also be narrower at intersections (to accommodate the left-turn lane) so there would be less vegetation in the median to visually compete with pedestrians. Selection of street trees and landscape plantings in the amenity zone would

take into account the location of adjacent building entrances and signage. Appropriate branching heights and staggered spacing for trees would allow unobstructed views to businesses. Besides trees, the landscaping would consist of low-lying groundcover.

Please see the Visual Quality section of Chapter 3 in the EA/DEIS or in Attachment 3 in the FONSI for a discussion of the visual impacts in the project area. The proposed landscaping is somewhat different to what was recently installed on North 175<sup>th</sup> Street near I-5. The plant species installed at 175<sup>th</sup> near I-5 include native Rock Rose, Japanese Holly, Blue Fescue, Lavender, and seasonal annuals. The Aurora 145-165 Project recommends Rubus, St. Johns Wort, Barrenwort, and Creeping Mahonia among others for the median planting.

**Response ID: 107      Quick construction needed**

***Responds to Comments: T-101, 32-6, 64m-5, 64g-5, 64g-8,***

Please see the description of construction staging in description of project alternatives in Chapter 2 of the EA/DEIS. The City is committed to completing construction of this project in a quick and efficient manner.

Businesses would not be monetarily compensated for a perceived loss of sales during construction, however, the City would mitigate construction impacts to businesses in other ways. Additional signage, public notice of business hours, and maintaining sufficient access to all businesses would all be provided by the City. Typical signs posted during construction would read “Businesses Open During Construction.” These commitments are also included in Chapter 9 of the City’s Aurora Corridor Real Property Acquisition and Relocation Policy, Procedures and Guidelines.

**Response ID: 108      Increased assessment allowance**

***Responds to Comments: T-102, 32-7***

The acquisition of right-of-way for roadway projects is governed by State and Federal law. These laws prescribe a specific process for acquiring properties including an appeal process for value/appraisal disputes. The City has elaborated on these guidelines in the Aurora Corridor Real Property Acquisition and Relocation Policy, Procedures and Guidelines. These policies, procedures, and guidelines will be revisited throughout the design of the project. These guidelines offer up to a \$5,000 incentive for a business to relocate within the City of Shoreline in the event that the business would need to relocate; No business relocations have been identified in the 145<sup>th</sup> –165<sup>th</sup> Street project area). The current policies provide an allowance for property owners to obtain their own appraisals. The procedures, which follow state and federal law, also provide for mediation in the event of disputes regarding property values.

**Response ID: 109      Project should pay for utility hookups**

***Responds to Comments: T-103, 32-8***

Utility hookups between properties and utilities are handled directly between property owners and utility companies. The City’s undergrounding ordinance, No. 82, requires service hookups to be paid by private businesses. Businesses have a right to appeal this payment to the City Council if they feel it should not be required. For the vast majority of utility undergrounding projects, the property owner pays the entire cost for the hookups. For the Aurora Corridor Project, the City is considering paying property owners partial

reimbursements for the hookups. Coordination of the hookups to manage potential disruption of service would be accomplished by the property owners and utility companies.

**Response ID: 110      Compromise between A and B**

***Responds to Comments: T-105, 36-10***

The City has used the discussion of impacts contained in the EA/DEIS, the recommendations from the Value Engineering study, and comments provided during the environmental process to improve Alternatives A and B. On December 9, 2002, the Shoreline City Council adopted Resolution No. 201, which selected Alternative A Modified as the design for the project. Based on this design, the current cost estimate for the project is \$19.6 million, which is less than the \$26.8 million estimated for Alternative A.

**Response ID: 111      Air quality benefits from vegetation**

***Responds to Comment: T-106***

Although trees and other vegetation provide some benefits, overall air quality benefits are likely to be minimal from the proposed vegetation in the build alternatives.

**Response ID: 112      Interurban Trail use**

***Responds to Comments: T-110, 62-3***

The Interurban Trail runs diagonal to Aurora and is 650' away at 145th Street. It is intended to provide regional mobility for bicycles and pedestrians while sidewalks along Aurora Avenue would give direct access to local businesses and to transit service. Bicycles would be able to use traffic lanes or the sidewalks if necessary, particularly in Alternative A and Alternative A Modified. Adding bike lanes would require the acquisition of additional private property.

Pedestrians would use sidewalks on Aurora Avenue to access businesses, access bus service, and reach street crossings.

**Response ID: 113      Median opposition**

***Responds to Comments: T-112, 64g-4, 64m-4***

Your opposition to a median is acknowledged.

The Proposed Action includes a raised median of varying width. Raised non-traversable medians remove conflict points from the roadway and focus access to where it is most needed and can be provided more safely with traffic control. As a result, some turning movements that would be made mid-block without the proposed action would be made at median openings and at intersections with the proposed action. The impacts of these shifts were accounted for in the traffic analysis.

Research by the National Academies of Science Transportation Research Board (TRB), the Federal Highway Association (FHWA), and Washington State Department of Transportation supports the effectiveness of access management treatments (including raised medians) to achieve improvement of safety and operational characteristics of the roadway.

Installation of the median may also make access to some businesses less direct. Some businesses that rely on impulse purchases may experience an impact on revenues as

potential customers are unable to make left-turns directly into the parking lot. However, in a paper by Kristine M. Williams, AICP, entitled “Economic Impacts of Access Management” (Center for Urban Transportation Research, 2000), the author reviewed recent studies on the business impacts of raised medians and concluded that the installation of medians has little overall adverse business impacts.

**Response ID: 114      Preserve buildings**

***Responds to Comment: T-113***

There would be no buildings displaced as a part of this project. Although none of the existing buildings would qualify for listing on the National Register of Historic Places, they may still be of local interest and any preservation activities would be at the discretion of the City.

**Response ID: 115      Aurora Avenue ownership**

***Responds to Comment: T-114***

The title for right-of-way is vested in the state of Washington. Refer to RCW 47.04.040 - Title to rights of way vested in state, and RCW 47.24.020 - Jurisdiction, control. In general, WSDOT has authority for review and approval of the geometric design for roadway improvements, for signing, striping and pavement markings, and for traffic control devices. WSDOT is also responsible for maintaining the pavement structure. The City of Shoreline is responsible for obtaining funding for improvements to Aurora.

**Response ID: 116      NEPA EIS needed**

***Responds to Comments: 27-5, 37-11, 63-95, 64-4, 64-20, 64-93***

A joint decision between FHWA, WSDOT, and the City of Shoreline was made on the appropriate level of documentation for NEPA. As the federal lead agency, the FHWA has the ultimate responsibility for assuring the requirements of NEPA are met. All elements that require evaluation in an Environmental Impact Statement were evaluated in the Environmental Assessment, including social and economic impacts. The Environmental Assessment is used to determine whether or not a project has significant impacts.

Also, per comment 63-95 please note that the project would have no wetland impacts.

**Response ID: 117      Environmental Justice violation**

***Responds to Comments: 27-11, 37-13, 61-33, 63-9, 63-106***

An environmental justice analysis considers whether there are disproportionate high and adverse impacts to low-income or minority populations. The EA includes an environmental justice analysis in accordance with the Executive, the Department of Transportation, and FHWA orders that guide EJ analysis. This analysis demonstrated that the construction and operation of the Aurora Corridor Project 145-165 would not result in disproportionately high and adverse effects on minority or low-income populations.

The City is aware that some businesses within the project area are Korean-owned. The City produced Korean language translations of fliers to assist the Korean business community members in their understanding of the project and of the meetings. The City further procured the services of a Korean language translator to be at the Property/Business Owner block meetings during the development of the project to hear concerns on potential designs.

During the EA/DEIS comment period, two notices ran in local papers, including the Korean Central Daily (published in Korean) announcing the publication of the document and requesting comments on the document. Comment letters were received in Korean and were translated, responded to, and included in the SEPA Final EIS as well as this FONSI. A Korean translator was present and used at the environmental hearing.

Korean businesses within the project area face the same types of potential impacts as other businesses. Adverse impacts to businesses such as less direct access and parking loss are anticipated to be offset by the inclusion of protected left- and u-turn pockets, increases in mobility and exposure to a larger customer base, and improvements to traffic and pedestrian safety and to the roadway and road edge appearance.

**Response ID: 118      Lynnwood model**

***Responds to Comments: 27-13, 64I-4***

The Citizen's Advisory Task Force wanted to develop a design which would more adequately address traffic and pedestrian safety than the Lynnwood design (Lynnwood/Edmonds/Snohomish County SR 99 project). The Lynnwood model is generally understood to include 7' sidewalks, three northbound and southbound general purpose lanes and a two-way center left-turn lane. Using a design similar to Lynnwood's would not substantially enhance pedestrian access and would not help reduce the number of accidents involving pedestrians. The design also would not meet the WSDOT's policies regarding access management and safety design and would not sufficiently improve traffic safety. The project in Lynnwood was not bound by WSDOT's access management policies because design decisions were made in the early 1990s, before these policies took effect.

**Response ID: 119      Additional projects for cumulative impacts analysis**

***Responds to Comments: 27-20, 37-18, 37-21, 61-17, 63-89, 63-90, 63-94, 63-103, 63-114, 64c-1***

Each environmental section of Chapter 3 in the EA/DEIS and Attachment 3 in the FONSI has an analysis of secondary and cumulative impacts. Cumulative impacts analysis is a study of the net incremental impact of this project and other past, present, and reasonably foreseeable future actions. Discussion of these types of impacts is required for both NEPA and SEPA.

Projects that were included in the cumulative impacts analysis are described in the Summary in the EA/DEIS as well as in Appendix B – Relationship to Plans and Projects. The EA/DEIS cumulative impact sections look at the combined impacts of three additional projects. These projects are Aurora Avenue North from North 165th Street to North 205th Street, the Interurban Trail, and the Pedestrian Safety Demonstration Project. A fourth project – Metro's Bus Rapid Transit Project – is also considered in the FONSI. These projects were selected for study because of their relationship to the Aurora Avenue 145-165 Project in terms of their proximity to the project and their effect on the movement of people and vehicles and the environment. While funding is not yet secured for the Aurora Avenue 165-205 Project, it is a project that the City has budgeted in its capital improvement plan and is actively planning. Therefore, this project must take into account when assessing cumulative impacts. Furthermore, members of the public have expressed interest in the potential combined impacts of the Aurora Avenue 145-165 and Aurora Avenue 165-205 projects, which the cumulative impact discussions for each element of the environment address.

Other projects proposed in the City of Shoreline have not been included for various reasons. These projects are the Central Shoreline Subarea Plan, King County Metro Transit-Oriented Development at North 192nd Street, Ronald Bog Drainage Improvements, 3rd Avenue NW Drainage Improvements, and North City Business District/15th Avenue NE. The Central Shoreline Subarea Plan and King County Metro Transit-Oriented Development Project were not included because the scope of these projects were not, and still are not, developed enough to identify potential impacts. The Ronald Bog Drainage and 3rd Avenue NW Drainage Improvement projects were not included because the potential effects from these improvements were considered beneficial by contributing to stormwater detention and flow control. In other words, these projects would not create new impervious surface area or require new detention or treatment facilities but would rather provide them. The North City Business District/15th Avenue NE was not included because of its distance from the proposed project (although transportation improvements to 15<sup>th</sup> Avenue have been included in the traffic modeling). Two other redevelopment projects, Top Foods and Sears Square were not included because they were occurring in already developed locations and the scale of these proposed projects was limited.

The purpose of showing the estimated levels of service for intersections on Aurora Avenue North throughout the City of Shoreline (Table 3-9), which takes into account the proposed project (Aurora Avenue 145-165 Project) in conjunction with the Aurora Avenue 165-205 Project, is to assess the cumulative impact of the project and other major actions per the requirements of SEPA and NEPA. Nonmotorized, transit, and local access issues are also analyzed with respect to potential cumulative impacts to address SEPA and NEPA requirements.

Table 3-10 in the EA/DEIS identifies the approximate cumulative direct land use impacts. (The assessment of these cumulative impacts has been included per SEPA and NEPA requirements.) The land shown in Table 3-10 would be acquired for new right-of-way and improvements associated with improvements along Aurora Avenue North northward from North 145th Street to North 205th Street and the Interurban Trail northward from North 175th Street to North 188th Street. Because the remaining portions of the Interurban Trail and the Pedestrian Safety Demonstration Project would be located within existing right-of-way, no additional direct land use impacts to private land would be expected.

**Response ID: 120      Freight mobility impacts**

***Responds to Comments: 27-22, 59-5, 61-41, 62-4, 64-27, 64-87***

Median breaks and turn bays provided in the build alternatives would be designed to accommodate left-turns by semi-trailers (WB-55 design vehicle) and u-turns by passenger vehicles and small trucks. Breaks have been located to correspond with high volume freight movements. Many of the business along Aurora Avenue that require commercial freight deliveries are accessible within 300 feet of side streets. Freight deliveries accessing Aurora Avenue North from I-5 can be re-routed to an alternate freeway exit in order to eliminate the need for a truck to cross oncoming traffic lanes in the current uncontrolled environment (with two-way, left-turn lane) and instead use one of many signalized intersections to make a controlled movement across conflicting traffic and set up for a right turn into and out of a property. The current unsafe practice of trucks using the center lane turn lane for unloading would be curtailed by the construction of the median.

In order to prevent or mitigate the diversion of truck trips into residential neighborhoods, the City may enforce vehicle-type restrictions on certain streets or install physical traffic control devices to discourage trucks from accessing residential streets.

As documented in the EA/DEIS and FONSI, traffic operations for the proposed action would be improved in comparison to the No Action Alternative. Trucks, along with all other traffic, would benefit from the improved operations. Furthermore, all vehicles, including trucks, would benefit from the projected reduction in accidents in this corridor due to the safety improvements. Analyses of right turns by trucks have been made to evaluate the capability for trucks to negotiate the turns. Design documentation will be developed, and the design will be reviewed by WSDOT, relating to right turn locations used by trucks.

**Response ID: 121      Impervious surface totals differ**

***Responds to Comments: 27-25, 50-29, 61-48, 64-35***

Impervious surface totals differ primarily due to the presence of planter strips in the design. Planter strips which are part of the Alternative A and the Proposed Action design provide vegetated areas to help infiltrate and absorb stormwater, especially though the use of the shrubs and trees. Alternative B, while having a smaller total “footprint”, does not include the use of pervious planter strips.

Existing impervious area for each build alternative, is defined as the total square footage of impervious (paved) surfaces within the project footprint limits. Note that due to the narrower footprint of Alternative B, the total square footage is less than in Alternative A.

The Proposed Action’s project area includes 767,500 square feet in Boeing Creek basin, 40,000 square feet in Thornton Creek basin, and 8,900 square feet in West Lake Washington Basin (see Table 10 in the FONSI). These numbers differ from those shown in the EA/DEIS because the Proposed Action has a slightly different footprint than both Alternatives A and B. The Proposed Action will increase impervious surfaces by 1,200 square feet in the Boeing Creek basin and 1,100 square feet in the Thornton Creek basin. However, the amount of pollutant-generating impervious surface (impervious surfaces used by vehicles that leave pollutants like oils and metals) would decrease by 58,200 square feet in the Boeing Creek basin and by 1,400 square feet in the Thornton Creek basin. This is because portions of Aurora Avenue that are currently accessible by car (the wide shoulders and two-way left-turn lane) will be converted to a non-pollutant generating impervious surface (such as a sidewalk) or to a pervious surface (such as the landscaped amenity zone or median). There would be no change in impervious surfaces in the West Lake Washington Basin.

**Response ID: 122      Availability of left and u-turns**

***Responds to Comments: 29-3, 64g-3, 64m-3***

Businesses would not be monetarily compensated for a perceived loss of sales during construction, however, the City would mitigate construction impacts to businesses in other ways. Additional signage, public notice of business hours, and maintaining sufficient access to all businesses would all be provided by the City. Typical signs posted during construction would read “Businesses Open During Construction.” These commitments are also included in Chapter 9 of the City’s Aurora Corridor Real Property Acquisition and Relocation Policy, Procedures and Guidelines.

Under the Proposed Action u-turns and left-turns would be available for northbound and southbound traffic at each signalized intersection (145<sup>th</sup>, 152<sup>nd</sup>, 155<sup>th</sup>, 160<sup>th</sup>, and 165<sup>th</sup> Streets ) as well as midblock near 163<sup>rd</sup> Street and at two locations between 152<sup>nd</sup> Street and 145<sup>th</sup> Street (see Figure 3 in the FONSI). This would limit the amount of additional travel that vehicles may need to drive to reach a particular parcel. Adverse impacts to businesses such as less direct access and parking loss are anticipated to be offset by the inclusion of protected left- and u-turn pockets, increases in mobility and exposure to a larger customer base, and improvements to traffic and pedestrian safety and to the roadway and road edge appearance. Please see the Economics section of Attachment 3 in the FONSI for a discussion of median impacts to businesses.

**Response ID: 123      Costs and tax losses**

***Responds to Comment: 29-6***

Project costs for the Aurora Avenue 145<sup>th</sup> to 165<sup>th</sup> Project are not included in the EA/DEIS (Refer to Response 96). Based on the design of the Proposed Action, the current cost estimate for the project is \$19.6 million. This cost estimate is a 30-percent design level estimate, which includes a substantial factor for contingency, uncertainty and risk. The Economics section of Chapter 3 has a discussion of business impacts. The impact on sales tax revenues due to operation of the project is very difficult to quantify due to the proprietary nature of sales information and the variety of factors that impact sales activity. Unpredictable factors other than the operation of the project may impact sales tax revenue (i.e. general state of the economy, management decisions, market forces). Impacts to businesses such as less direct access are anticipated to be offset by increases in mobility and exposure to a larger customer base, and improvements to traffic and pedestrian safety and to the roadway and road edge appearance. No additional sales tax analysis was performed for the EA/DEIS or FONSI.

**Response ID: 124      Alternative B support**

***Responds to Comment: 32-1***

Your support of Alternative B, contingent on additional mitigation, is acknowledged.

The Proposed Action is a modification of Alternative A, which was featured in the EA/DEIS. It proposes construction of continuous 7-foot wide sidewalks with an adjacent 4-foot wide amenity zone and 6-inch curb that extends the length of the project area, and seven lanes of traffic (two general-purpose lanes and one continuous Business Access/Transit [BAT] lane northbound and southbound, and one center lane for left/ u-turn pockets/median). See the description and figures in the FONSI. This action would satisfy many objectives beyond moving automobiles, including improving traffic safety, lighting, transit mobility, improving the visual image along Aurora Avenue and encouraging economic redevelopment. The proposed action would have no significant impacts.

**Response ID: 125      Secondary and cumulative impacts**

***Responds to Comment: 32-9***

The secondary and cumulative impacts discussion follows the discussion for direct impacts to Alternative B in each environmental element section of Chapter 3 (for example Land Use or Economics). Comment 32-9 refers to Table 3-39 in the EA/DEIS, which shows the effect of other projects on historical resources. The secondary and cumulative impacts discussion on



page 3-62 discusses cumulative impacts with respect to the project in general not with respect to Alternative B in particular. Table 3-22, “Estimated Initial Property Tax Impact—Alternative B,” at the top of page 3-62 and before the heading for “Secondary and Cumulative Impacts,” is not related to the discussion of secondary and cumulative impacts, but the table’s proximity to that discussion may have been misconstrued.

**Response ID: 126      “No Action” Alternative**

***Responds to Comment: 34-4***

The discussion of impacts for every environmental element considers a “No Action” Alternative as well as Alternatives A, A Modified, and B. Page 2-11 of the EA/DEIS describes the No Action Alternative. Under the No Action Alternative, no new major construction activities described for the proposed project would occur. Short-term minor construction necessary for continued operation of the existing roadway facility would be accomplished and minor safety improvements could be constructed as required.

**Alternative A** would include construction of 8-foot-wide sidewalks, plus an adjacent 4-foot-wide amenity zone and a 6-inch curb that would extend the length of the project area, and seven traffic lanes (two general-purpose lanes and one continuous Business Access/Transit [BAT] lane northbound and southbound, and one center lane for left- and u-turn pockets/median). A raised center median would be continuous between signalized intersections, except for three left- and u-turns openings (North 149th Street, North 163rd Street, North 160th Street). Additional proposed improvements include constructing curbs and gutters on all sidewalks, planting street trees, and providing other pedestrian amenities. Overhead distribution utility lines (low-voltage electrical, cable television, and telephone) would be relocated underground. Stormwater facilities would also be constructed.

**Alternative A Modified** proposes construction of continuous 7-foot-wide sidewalks with an adjacent 4-foot-wide amenity zone and 6-inch curb that extends the length of the project area, and seven lanes of traffic (two general-purpose lanes and one continuous Business Access/Transit [BAT] lane northbound and southbound, and one center lane for left/U-turn pockets/median). Additional left turn/U-turn pockets would be provided southbound at Jiffy Lube/The Brake Stop, northbound at North 149th Street, southbound at Seattle Restaurant Supply, northbound at Westover Plaza, northbound at North 163rd Street, and southbound at Vons Square/Sarah’s Auto Center. The width of the median at turn pockets would be 4 feet. North 160th Street east of Aurora Avenue would be closed to through-traffic. The sidewalk and amenity zone would be continuous on the east side of Aurora Avenue North through this intersection. In addition, dual left-turn lanes would be provided northbound at North 160th Street and eastbound on North 155th Street at Aurora Avenue. A right-turn lane would also be constructed southbound at North 155th Street. North 160th Street would be closed to through-traffic on the east side of the intersection with Aurora Avenue North. Additional proposed improvements include constructing curbs and gutters on all sidewalks, planting street trees, and providing other pedestrian amenities; sidewalks would be narrowed where building conflicts exist. Overhead distribution utility lines would be relocated underground. Stormwater facilities would also be constructed.

Alternative A Modified includes a design option that would keep North 160th Street open to through-traffic east of Aurora Avenue North. Under this option, the design of this intersection at North 160th Street would be the same as in Alternative A.

**Alternative B** would include construction of 7-foot-wide sidewalks (adjacent to a 6-inch curb) that extend the length of the project area and the same lane configuration as Alternative A. Additional openings in the raised median would be provided in left-turn pockets for left turns and/or u-turns at the following locations: southbound at Shurgard Storage Center, northbound at the Quest Inn Motel, southbound at Seattle Restaurant Supply, southbound at Shoreline Family Auto Care, and northbound at the Arden Rehabilitation Center. In addition, dual left/u-turn lanes would be provided northbound at North 160th Street and eastbound at North 155th Street. A right-turn lane would also be constructed southbound at North 155th Street. Curbs and gutters would be included on all sidewalks and overhead distribution utility lines (low-voltage electrical, cable television, and telephone) would be relocated underground. Alternative B would not include street trees. Stormwater facilities would also be constructed.

Please see the Economics section of Chapter 3 in the EA/DEIS or Attachment 3 in the FONSI for a full discussion of impacts to businesses.

**Response ID: 127      Project finance information**

***Responds to Comments: 34-6, 50-31***

The City's 2003-2008 Capital Improvement Program lists the funding sources for this project. The funding sources include City Roads Capital Fund, WSDOT, Transportation Improvement Board, Surface Transportation Program, Pedestrian Facilities Program, Federal Highways, Metro King County. In most cases the grants for this project were written based on the concept resulting from the Predesign Study (which can be viewed at the Shoreline City Clerk's office) and CATF recommendations. There is potential that if the project concept changes dramatically, that the grant funds may be revoked. The grants are for this project; if the City returns the grants they would be allocated to another jurisdiction elsewhere.

The reallocation of any potential cost savings is unknown.

**Response ID: 128      Additional business impacts**

***Responds to Comments: 34-7, 37-30, 64-7***

Estimating potential business failures is nearly impossible to predict due to the numerous non-project related factors that impact the viability of a business (i.e. overall health of the local economy, quality of customer service, demand for merchandise offered, effectiveness of marketing/advertising, etc). It is possible that project-related impacts during construction or operation could result in enough of a decline in revenues for a business to fail or need to move to a new location.

There are a total of 2,014 parking spaces within the project area. Alternative A would impact 76 non-compliant parking spaces and 11 compliant spaces following mitigation. (Non-compliant parking spaces are spaces that do not conform with the City code or are in publicly owned right-of-way.) Alternative A Modified would impact 25 non-compliant parking spaces and, following mitigation, 10 compliant parking spaces. Alternative B would impact 61 non-compliant parking spaces and 6 compliant spaces following mitigation. Mitigation would entail reconfiguration of remaining parking area to maximize the number of available parking spaces and would occur as part of the project. While businesses have

relied on the use of non-compliant parking spaces for overflow parking and display purposes in the past, the City is not required to mitigate the loss of non-compliant spaces.

**Response ID: 129    Final EIS should address NEPA issues**

***Responds to Comment: 34-8***

Because the Draft EIS document is also a NEPA Environmental Assessment, it does cover NEPA issues. The Final EIS prepared by the City of Shoreline evaluates the same environmental issues as the Draft EIS, even though it will not be a NEPA document.

Potential impacts to three drainage basins (Boeing Creek, Thornton Creek, and West Lake Washington [Desmore]) in which the project is located were considered in the Water Quality/Surface Water section of the EA/DEIS. The results of the analysis are summarized below.

**Construction.** During construction, accidental or inappropriate discharge of sediment from cleared and excavated areas and/or spills of fuel, lubricants, and other construction-related hazardous material could result in these materials entering project area streams via stormwater runoff. The likelihood of this happening would be minimized through the implementation of construction-related best management practices (BMPs). Proposed BMPs are listed in the FONSI.

**Operations.** While the stormwater runoff volumes and peak flow rates discharged to Boeing Creek would experience a small increase, the increase would be so small that it should not have a flow- or volume-related impact on the aquatic habitat in Boeing Creek. In the Densmore basin there would be no change in impervious areas, so the peak flows and volumes of stormwater runoff delivered to the downstream system should be unchanged and would not affect aquatic habitat in the basin. The stormwater runoff volume discharged to Thornton Creek would increase by such a small amount that the flow-related impacts would be minimal and should not have a stormwater-volume-related impact on the aquatic habitat in Thornton Creek.

With respect to stormwater quality, the project would provide treatment facilities in an area which is not currently served. In addition, special oil control facilities would be installed at the intersections of Aurora Avenue North with North 145th Street and North 155th Street. Because runoff from the existing road is not currently treated, implementation of the proposed stormwater quality treatment measures should result in a substantial decrease in the pollutant load (especially total suspended solids and other associated pollutants) carried by the stormwater runoff from the roadway to each of the receiving water bodies. The biggest impact should be an improvement in the overall water quality in Boeing Creek because most of the proposed project area is within the Boeing Creek basin. The installation of the stormwater quality treatment facilities in the Thornton Creek and West Lake Washington (Densmore) basins might provide a slight improvement in the water quality of the receiving streams, but because the proposed project area within these basins is so small relative to the total drainage area in these basins, the improvements are not expected to be discernible.

**Response ID: 130      Seattle Coordination**

***Responds to Comment: 35-1***

Your commitment to coordinating efforts on the Aurora Avenue 145th to 165th project is acknowledged.

**Response ID: 131      Reduced access**

***Responds to Comments: 36-4, 64h-2, 64i-1***

Impacts to businesses during construction might include temporarily increased congestion, noise, dust, and interrupted or more difficult access. Small businesses and businesses that depend on location or drive-by customers are the most likely to be affected. Real or perceived loss of access or substantial changes in access can create disruptions and reductions in revenue. Some businesses under each alternative would experience temporary impacts as driveways are moved, retaining walls are constructed, or buildings are modified. A potentially large decline in revenues could result in business failure or cause a business to move to a different location. Some businesses might experience a temporary increase in revenues from the increased construction and purchases by construction workers. The City is committed to completing construction of this project in a quick and efficient manner. See Response 107 for a more detailed discussion of the need for quick construction.

Property access is affected by the design and spacing of driveways, the ease and safety of pulling off or onto a road, the distance from intersections, and traffic signal sequencing. Impacts to businesses such as less direct access are anticipated to be offset by increases in mobility and exposure to a larger customer base, and improvements to traffic and pedestrian safety and to the roadway and road edge appearance. Access safety improvements, including the median, would provide safe and easy access to properties. The BAT lanes would allow safe and easier customer access in and out of businesses.

**Response ID: 132      Median breaks**

***Responds to Comment: 36-7***

The location for left/u-turn median openings for the build alternatives have preliminarily been established based upon input from the public, property owners, business owners, and WSDOT. A primary consideration for locating median openings for left turns is their physical separation from other traffic conflict locations.

Property access is affected by the design and spacing of driveways, the ease and safety of pulling off or onto a road, the distance from intersections, and traffic signal sequencing. Access safety improvements, including the median, provide safe and easy access to businesses. The Business Access and Transit lanes would allow safer customer access in and out of businesses.

**Response ID: 133      Mock up design first**

***Responds to Comment: 36-8***

Real mockups for 3 lanes with u-turns have already been developed to demonstrate the viability of the alternatives. In the Puget Sound area, they include: 348<sup>th</sup> Street in Federal Way; on International Boulevard in the City of SeaTac; and on 148<sup>th</sup> Avenue NE in Bellevue. The basic concepts for the alternatives have also been demonstrated throughout urban areas in California, Arizona, Colorado, and many other states.

**Response ID: 134      “No Action Alternative” requirement**

***Responds to Comment: 36-9***

The study of a “No Action” Alternative is a requirement of both NEPA and SEPA environmental documents of this type.

Based on a range of input received, the project team revisited the alternatives in order to determine if it was possible to modify the design sufficiently to minimize impacts and concerns while still maintaining the operational efficiency of the alternatives. “Alternative A Modified” was developed through the process of reviewing and responding to Value Engineering proposals, responding to public comments on the three alternatives including in the EA/DEIS, comments from WSDOT, and the “CATF 32 Points” which outline the City Council adopted CATF recommendations for the development and implementation of the project. Following the issuance of the Final EIS, the Shoreline City Council passed an ordinance selecting Alternative A Modified as the Proposed Action.

**Response ID: 135      Predesign drawings**

***Responds to Comment: 37-6***

Design documents related to the Predesign study may be included as a part of the record but would not be included as a part of the FONSI document because they are not relevant to the analysis of the impacts of the proposed action. Meeting minutes are contained within the project record file.

**Response ID: 136      Aurora Avenue 165<sup>th</sup> to 205<sup>th</sup> principal features**

***Responds to Comment: 37-9***

The design of alternatives for other portions of Aurora Avenue/SR99 has not been developed beyond about a five percent level. Much more work in defining the best alignment for the alternatives would be needed before reasonable assessment of the amount of impact avoidance and mitigation can be accomplished. The additional time necessary to develop other projects on Aurora to the level of design needed to obtain accurate analyses of direct operational environmental impacts would take at least another 6-to-12 months. Also, the City wishes to conduct and complete the Central Shoreline SubArea Plan before additional work on planning for other projects on Aurora Avenue.

The design of alternatives for the Aurora Avenue 145<sup>th</sup> to 165<sup>th</sup> project has been developed to a much greater extent (roughly to a 30 percent completion level), and through that effort potential impacts have been avoided and/or mitigated. The City is ready to proceed with making much needed improvements to this portion of Aurora Avenue. By taking prompt action on this project, the public can gain traffic operations and safety benefits, pedestrian access and safety benefits, transit speed and reliability benefits, along with complementary enhancements to the environment. Each year there are nearly 100 traffic accidents in the project limits, many of these accidents can be prevented with features that have been included in the two project alternatives. Delay to making improvements that can provide immediate benefits, including reducing the risk of accidents, only for the sake of conducting further studies of other potential projects in Shoreline is not reasonable. The Aurora project has been studied for more than four years. The City of Shoreline includes a long list of transportation projects in its Capital Improvement Program, however high priority projects should not be delayed only so all of those projects can be studied to the same level of detail.

The Comprehensive Plan EIS provided a comprehensive analysis of environmental impacts for the whole city including all of the transportation projects. Also, the Aurora Avenue 145th to 165th EA/DEIS and FONSI included analyses of cumulative impacts of other projects.

**Response ID: 137      Significant Impacts declared**

***Responds to Comment: 37-12***

The scoping notice that the City published for its SEPA EIS said that, “The lead agency has determined this proposal is not likely to have a significant adverse impact on the environment. Nevertheless, out of an abundance of caution and to afford full consideration of any potential significant adverse impacts, an environmental impact statement (EIS) is to be prepared.”

**Response ID: 138      Historical properties**

***Responds to Comment: 37-16***

No buildings would be demolished as a part of the Aurora Avenue 145-165 Project. Furthermore, the project would have no substantial impacts on any properties listed on or eligible for listing on the National Register of Historic Places. The state historic preservation officer has agreed with our findings in writing.

**Response ID: 139      Land Use Cumulative Impacts**

***Responds to Comments: 37-20, 37-22***

The cumulative impacts section for land use discloses the amount of new right-of-way that would be needed as a result of the Interurban Trail and Aurora Avenue 165-205 projects. That degree of information is reasonable for determining the cumulative magnitude of impact. Providing a parcel by parcel list of right-of-way required for these projects on properties outside of the Aurora Avenue North 145th to 165th project area would not aid in the decision-making process.

**Response ID: 140      Should have included “Alternative 1”**

***Responds to Comments: 37-23, 37-24***

NEPA and SEPA require that a range of reasonable alternatives be examined, but not that all alternatives be examined. The City has included three “build” alternatives that it believes represent the endpoints of a range of possible designs that would still meet the project’s stated purpose and need. The alignment for “Alternative 1” (from the Predesign study which can be viewed at the Shoreline City Clerk’s office) had been rejected through the pre-design process and there were no requests to include that specific design in the environmental documents as a part of the scoping process.

**Response ID: 141      EIS must analyze whether proposal serves the public interests**

***Responds to Comment: 37-26***

The City’s SEPA action will not be tied to the right-of-way permit. Regardless, the City is evaluating the project with the overall needs of the area in mind. The fact that the project supports the City’s Comprehensive Plan is an indication that the project serves the overall interests of City residents.

**Response ID: 142      Existing transportation conditions**

***Responds to Comments: 37-29***

Existing Conditions for transportation are documented beginning on page 3-3 of the EA/DEIS.

The traffic analysis was not performed for how the alternatives would impact the existing conditions since the project would not be constructed for a number of years at which time conditions would not likely match what is currently experienced. Transportation conditions were evaluated for a future 2020 condition after the project would have been constructed to represent a conservative case. At the time of completion of the project (approximately Year 2005) the traffic operations for the “build” alternatives would be much better than shown for the year 2020 condition. See Table 1 in the FONSI for level of service impacts at intersections under the Proposed Action.

**Response ID: 143      Business remodeling**

***Responds to Comment: 37-31***

As necessary, the sidewalk width would be reduced in order to avoid altering or displacing existing buildings. Seattle Ski and the Hideaway Card Tavern are the two buildings that have the greatest potential for having reduced sidewalk widths in Alternatives A and A Modified. Locations where reduced sidewalks would be installed with this project would be required to construct full-width sidewalks at the time of future redevelopment of the property. In addition, the redeveloped property would no longer be required to set aside a 10' setback from the right-of-way. Most of the existing parking areas along the shoulder are either non-compliant spaces according to City code or within the public right-of-way. This type of uncontrolled shoulder parking endangers both vehicles and pedestrians. Accommodating shoulder parking within the design of Aurora Avenue would widen the street's footprint and impact more private property. Sufficient parking can be made available to all businesses by reconfiguring existing off-street parking areas.

**Response ID: 144      Construction noise and hazardous releases**

***Responds to Comments: 37-33***

**Construction Noise.** The EA/DEIS identifies the potential noise levels generated by construction equipment. Because the same type of equipment would be used for each of the build alternatives, similar impacts are expected from each alternative. Any potential noise impacts resulting from construction would be mitigated as follows:

- Construction noise would be reduced with properly sized and maintained mufflers, engine-intake silencers, and engine enclosures, and by turning off idle equipment and confining activities to daytime hours. Daytime hours are defined in the City of Shoreline's Municipal Code (9.05.010(C.8)) as 7 a.m. to 10 p.m. on weekdays and 9 a.m. to 10 p.m. on weekends. Stationary equipment would be placed as far away from sensitive receptor locations as possible. Where this is infeasible, or where noise impacts are still substantial, portable noise barriers would be placed around the equipment with the opening directed away from the sensitive receptor property.
- Although back-up alarms are exempt from the Washington noise ordinance, they are among the most annoying sounds from a construction site. Where feasible, equipment

operators would drive forward rather than backward to minimize this noise. Requiring operators to lift rather than drag materials wherever feasible would also reduce the noise generated from material handling. Backup beepers could also be disabled and replaced with human spotters.

- If construction must occur at night to avoid conflicts with traffic on Aurora Avenue North then a noise variance would be obtained from the City of Shoreline.

**Hazardous Materials.** Environmental agency records were obtained from Environmental Data Resources (EDR), Inc., database service that searches current federal and state environmental agency databases. These records are presented in an exhibit following the Hazardous Materials section of the EA/DEIS (pages 3-154 through 3-157). The records identified the location of hazardous material within varying distances of the corridor, specifically: in the corridor, within 0.25 mile of the corridor, and within 0.5 mile of the corridor.

Based on a review of this information, potential types of hazardous substance contamination that could be encountered during project construction include primarily petroleum-contaminated soil and groundwater, but other contaminants, such as volatile organic compounds and PCBs, are also identified in environmental media. If this contamination is not managed properly in accordance with existing regulations, there is a potential impact to human health and ecological receptors. The sites identified within the project corridor are “reasonably predictable” sites where the nature of the contamination or potential contamination is available from files at Ecology. Reasonably predictable sites are typically small to medium in size, the potential contaminants are not extremely toxic or difficult to treat, and probable remediation approaches are straightforward.

Other potential sources of hazardous materials that may be encountered when utilities are placed underground are PCBs in transformer and underground storage tanks, including leaking underground storage tanks. The possible environmental impacts of encountering an uncontrolled hazardous substance might include the following:

- Potential release of contaminated air emissions (dust and volatile organic compounds), soil, surface water, and groundwater during construction
- Potential alteration of contaminated groundwater plume(s) and generation of contaminated water during dewatering activities
- Potential alteration of contaminant migration pathways due to excavation and other construction activities

These potential impacts can be avoided by following the mitigation measures listed in the EA/DEIS and FONSI.

The construction impacts of the three build alternatives are similar. However, Alternative A includes a wider right-of-way than Alternative A Modified. Both of those alternatives are wider than Alternative B. Therefore, if contamination is encountered during construction, there is the potential that the most area would be impacted under Alternative A, followed by Alternative A Modified (the Proposed Action), and then Alternative B.



During operations, increased traffic flow during long-term operation may result in increased transportation of hazardous substances; therefore, there is the potential for increased risk of incidental spills of these materials. This potential impact is the same for the alternatives.

**Response ID: 145      Signal spacing**

***Responds to Comments: 38-2, 38-9, 38-33, 63-21, 64-52***

WAC 468-52-040 represents general guidelines to be followed when considering improvements to highways. The Washington State Department of Transportation retains design approval for any State Highway. The new signals at North 152nd Street and North 165th Street have been proposed for a number of reasons, such as to provide a "protected" u-turn for north/south traffic on Aurora Avenue North, to allow pedestrians to safely cross Aurora Avenue North, and to improve access for residents of adjacent neighborhoods. Signal warrant analyses would be prepared for any new signals added by the project.

**Response ID: 146      Deviations**

***Responds to Comment: 38-10***

The City has coordinated design issues and confirmation of design standards for this project with WSDOT continuously over the past four years. The City has discussed potential design deviations regarding many geometric design elements for the project with WSDOT and WSDOT has stated its position regarding the likelihood of approval of deviations. After determination of the preferred alternative, it may be necessary for the City to request design deviations. Prior to completion of the anticipated NEPA Finding of No Significant Impact (FONSI), the City would identify and confirm if deviation requests would be required and an initial opinion from WSDOT on potential for approval. Regarding posted speed limits, the City did pursue reduction of the speed limit from 45 mph to the current 40 mph several years ago. In that process, WSDOT and the City conducted studies required by WSDOT leading WSDOT to approval of the reduced speed limit. For additional information on WSDOT requirements to change speed limits, see Response ID: 86.

**Response ID: 147      Predesign study area**

***Responds to Comments: 38-19***

Aurora Avenue North was initially analyzed in a programmatic fashion in the Aurora Corridor Predesign Study (which can be viewed at the Shoreline City Clerk's office) to determine a roadway concept that could meet the goals stated in the City's Comprehensive Plan. This concept, along with specific recommendations from the CATF, has been carried forward to provide the basis for project-level alternatives for the Aurora Avenue North 145th to 165th project.

The Predesign Study contains all of the analysis (including transit operations and pedestrian safety) of programmatic Alternatives 1, 2, and 3.

**Response ID: 148      Scoping notice and comment period lengths**

***Responds to Comments: 38-23, 56-1***

The lengths of the scoping period and comment period was within the suggested time lengths for NEPA Environmental Assessments and SEPA Environmental Impact Statements. Scoping materials were mailed out on July 27, 2001. On August 2, 2001, the SEPA

Determination of Significance and Request for Comment on Scope of Environmental Impact Statement was published in local papers. This started the scoping comment period. The period closed 3 weeks later on August 24, 2001.

For the comment period on the EA/DEIS, the agencies and public had 38 calendar days from the issue of the EA/DEIS to the date that comments were requested (July 10, 2002 – August 16, 2002). This is a reasonable length for a comment period and it is reasonably consistent with what is typically done on transportation projects where a hearing is held. . The EA/DEIS was available 28 days before the public hearing – which is double the minimum amount required under NEPA – and contained a summary chapter. A hearing in September as requested by these comments would have resulted in a unnecessarily long comment period. Because of the unsafe conditions on Aurora Avenue North this project is time sensitive; City staff are committed to keeping the project moving forward in a timely fashion as appropriate. Therefore, the timing between the date public hearing relative and the date of issuance of the EA/DEIS was kept within the normal range for NEPA EA's and SEPA EIS's.

**Response ID: 149      Public and agency input**

***Responds to Comments: 38-26***

All input from the public and agencies was considered but not all of it was accepted. Because public and agency input originated from a broad spectrum of participants, some input conflicted with other input, some was beyond the scope of this project, and some had direct application.

Alternatives and design concepts were rejected for further environmental analysis for a variety of reasons. See the Alternatives Considered But Rejected discussion that is a part of Chapter 2 in the EA/DEIS.

**Response ID: 150      Summary isn't detailed enough**

***Responds to Comments: 38-27, 53-7***

The summary section only provides a brief description of the alternatives analyzed in the EA/DEIS. Please see the full description of each alternative (including graphics) in Chapter 2. A description of the Proposed Action is in contained on page 1 in the FONSI; impacts caused by the Proposed Action are contained in Attachment 3 in the FONSI.

**Response ID: 151      Introduction page**

***Responds to Comment: 38-28***

This section is only the introduction page – it contains no analysis. Please see the Transportation section of Chapter 3 for a description of each alternative's effects on traffic congestion and safety.

**Response ID: 152      Traffic congestion data**

***Responds to Comments: 38-30***

Throughout the study process for the Aurora Avenue 145th to 165th project, the public has expressed concern regarding traffic congestion on Aurora Avenue. The City of Shoreline Comprehensive Plan has defined Level of Service F as a condition that is considered undesirable. National literature, such as the Highway Capacity Manual also suggests that

Levels of Service E and F represent a congested condition. With “No Action”, several of the project intersections under year 2020 conditions would exceed Level of Service E. Most people would consider these conditions to be representative of the term “traffic congestion.” For more detailed information regarding traffic congestion under the “No Action” alternative, please see the traffic analysis presented in the Transportation section of the document.

**Response ID: 153      Sidewalk dimensions of “Full WSDOT design”**

***Responds to Comments: 38-42, 61-74***

The alternatives proposed by various parties during the scoping process were typically incomplete and not comprehensive in addressing all aspects of the project’s Purpose and Need. Most of these proposals suggested dimensions for only some of the design elements of the project. This portion of the document summarizes each proposal exactly as proposed. The particular proposal questioned by the comments does not include a specific dimension for the sidewalks or amenity zones. Instead the proposal regarding “Full WSDOT Design Level” addressed only the dimensions of elements within the outside edges of the roadway.

This particular design was rejected because the additional width from 12-foot-wide lanes would add another 6 feet to the cross section of the project. Widening the median from 4 feet to 6 feet would further increase the cross section by 2 feet. The extra right-of-way needed to accommodate such a cross section would have socioeconomic impacts, such as the acquisition of substantially more private property which would result in business displacements and parking loss with less room left over for reconfiguration of parking areas. All of the additional pavement width for the lanes would be impervious, which would increase the amount of surface water runoff that would require detention and treatment.

**Response ID: 154      Societal costs**

***Responds to Comment: 38-45***

The text is accurate in describing the accident experience along Aurora Avenue as *among* the highest in the state for a facility of its *type*. The comment refers to a list which includes all types of State Highway facilities including Interstate 5, which is a freeway. The societal cost calculation presented is not a summation of High Accident Locations (HALs) but rather a calculation for all accidents.

**Response ID: 155      LOS solutions at 165th**

***Responds to Comment: 38-47***

The proposed traffic signal at North 165th Street would allow those people who live in adjacent neighborhoods to safely get access onto Aurora Avenue. The signal would also provide a "protected" u-turn for north/south traffic on Aurora Avenue, in addition to allowing pedestrians to safely cross Aurora Avenue. The signal would serve pedestrian crossings and aid pedestrian access to bus zones. Little or no traffic diversion onto neighborhood streets as a result of the project alternatives is anticipated. Conditions with the build alternatives would be much improved in comparison to the “No Action” Alternative to improve traffic and transportation along Aurora Avenue. For example, the level of service (LOS) under the No Action Alternative at Aurora Avenue North and North 165th Street would be LOS F (i.e., the average delay at the intersection would be greater than

80 seconds), while with the proposed project the intersection would operate at LOS B (i.e., would experience delays greater than 10 seconds but less than or equal to 20 seconds).

**Response ID: 156    Safety for U-Turns**

***Comments 38-49, 38-51, 61-84***

See the Transportation section of the EA/DEIS for discussion of accidents and safety for Alternatives A and B and Attachment 3 in the FONSI for transportation impacts associated with the Proposed Action. Under the description of Alternative B's safety, there is brief mention that there would be greater risk of accidents for that alternative due to more median openings and potential conflict points.

Regarding concern for concentrating left turns, this is the problem with two-way, left-turn lanes that is being addressed. With two-way, left-turn lanes, there is no focus for left-turn location. Therefore, the location where left turns and conflicting movements may occur is unpredictable to drivers. Focusing left and u-turns at fewer locations with a median is being proposed as part of the solution to reduce conflict points and improve overall traffic safety. The u-turn volumes at the focused locations would not be heavy volumes. The locations where u-turns would be heaviest would be at signal-controlled locations. Safe u-turns at uncontrolled locations would require that u-turning vehicles wait for gaps in traffic flows/platoons. The median openings at uncontrolled locations would be located adjacent to driveways at high trip generating land uses, so those openings would serve left turns as well as u-turns.

Due to the provision of u-turns at signalized intersections, an overlapping green arrow for right turns during left/u-turn signal phases would not be provided. Right-turn-on-red traffic must yield to conflicting through and u-turn movements. Signage would be included in the intersections to alert right-turning drivers. This does have an affect on intersection capacity, and this operation has been simulated and reflected in the Year 2020 LOS results. Table 1 in the FONSI shows that all intersections except for North 145<sup>th</sup> Street and Aurora would operate above LOS F in the year 2020. This intersection operates at LOS F in the No Action Alternative as well in year 2020. Therefore, u-turns will not cause failing levels-of-service at intersections. Also, protective-permissive signal operations will not be used for left- and u-turn signals.

**Response ID: 157    Comprehensive Plan LOS requirements**

***Responds to Comment: 38-52***

The City, per its comprehensive plan (City of Shoreline, 1998), uses a zonal average LOS measure to determine acceptable intersection operations. For the Aurora corridor, this is represented as a zonal average of LOS E. Using this methodology, LOS for intersections along the Aurora corridor must average LOS E or better to comply with the City of Shoreline Comprehensive Plan and its transportation concurrency goals. The Proposed Action would satisfy this requirement.

**Response ID: 158    Vehicle delay data**

***Responds to Comments: 38-53, 50-14, 63-20, 64-89***

Level of service calculations were performed using the Highway Capacity Manual methodology. This methodology represents level of service in terms of letter grades (A

through F) which equate to ranges of average vehicle delay expressed in seconds and not cumulative intersection delay.

A combination of signal progression, signal spacing and relatively low cross-street traffic volumes contribute to little delay for the predominant traffic movement which results in low overall intersection delay at North 152<sup>nd</sup> Street and North 165<sup>th</sup> Street with signalization of these two intersections.

LOS D should be indicated for the North 160<sup>th</sup> Street signalized intersection.

Without traffic signals at North 152<sup>nd</sup> Street and North 165<sup>th</sup> Street, vehicles attempting to enter Aurora Avenue would be required to wait for a gap in traffic rather than have one provided by a signal. Without the signal providing these gaps at a minimum time interval, gaps may not occur for several minutes causing delay to the approaching vehicles, and that is why the minor approach delays at these intersection are worse than at North 155<sup>th</sup> Street under the No Action Alternative (Table 1-2 of the EA/DEIS). The improvement in level of service at the minor approaches to the intersection of Aurora Avenue North and North 165<sup>th</sup> Street would be expected as a result of adding a signal at this location. The improvements to Level of Service at North 160<sup>th</sup> Street are due to the various geometric design options discussed in the EA, including the addition of lanes, or the closure of the east leg of that intersection.

Southbound truck traffic will not be re-routed to North 155<sup>th</sup> Street. Westminster Way will remain open with modifications to the intersection in order to shorten the crossing distance for pedestrians and to reduce the design speed to discourage speeding.

**Response ID: 159      Boeing Creek Basin**

***Responds to Comments: 39-2, 63-116***

Stormwater is currently channeled, collected, and conveyed via inlets and storm drains on both sides of the roadway. Flows to Boeing Creek would remain at current levels. (Response ID 45 provides a detailed discussion of water quality and quantity.)

The City of Shoreline will be undertaking a program of improvements to the basin. Once defined and planned these projects will be added to the City's Capital Improvements Program.

**Response ID: 160      Hydrant spacing**

***Responds to Comment: 40-1***

Improved fire hydrant spacing and its effects will be considered during final design.

**Response ID: 161      Economic and social impacts**

***Responds to Comments: 43-1, 52-2, 63-2, 64k-2***

Social and Economic impacts are described according to NEPA and SEPA guidelines in their respective sections in Chapter 3 of the EA/DEIS and in Attachment 3 in the FONSI. Impacts to businesses during construction might include temporarily increased congestion, noise, dust, and interrupted or more difficult access. Real or perceived loss of access or substantial changes in access can create disruptions and reductions in revenue. Right-of-way acquisition would result in the loss of parking spaces; however, replacement of some of the

spaces is possible. Right-of-way acquisition would also remove a small amount of taxable property from the City's taxable base. The local and regional economies would benefit from the operation of the project as mobility and safety are improved along Aurora Avenue North.

This analysis did consider the impact to businesses caused by the median. Access to some of the businesses along Aurora Avenue North would be less direct because of the removal of the 2-way left-turn lane and installation of the median with left- and u-turn pockets. This would likely equally impact and benefit businesses on both sides of the median that rely on impulse purchases because customers might decide to frequent competitors that are located on the same side of the street. This issue would be partially offset by the inclusion of left- and u-turn opportunities in the median and at intersections. The Proposed Action has the potential to contribute to an increase in property values within the corridor. Property values will be determined by market forces, which are driven by supply and demand. The roadway improvements will improve access to businesses in the area, which might make properties more attractive for businesses and new development. Other factors that affect property values include local zoning and land use regulations, local development trends, and other social and economic factors.

Current and projected employment statistics for the City of Shoreline are presented in the EA/DEIS. The project would not displace any businesses, therefore, no loss of employment is expected to result from the proposed action.

**Response ID: 162      Oil-water separators and catch basin maintenance**

***Responds to Comments: 43-2, 53-6, 55-10, 61-46***

Oil-water separators are planned for specific "high-use" intersections (North 145th and North 155th Street). The separators are designed to remove free oils from the stormwater. As long as the oils have not become chemically or mechanically emulsified, these separators would remove the oils to the design criteria performance concentrations. The separators are designed to remove solids entering the separator and separating free oils floating on the water surface from the stormwater. Soluble pollutants that mix with water are not handled by the separators, but by detention facilities where water can be held still to allow pollutants to settle out. Small leaks along the roadway (and any roadway for that matter) would always occur, but these would be diluted prior to entering into the streams by the large quantities of stormwater during rain events. The oil-water separators would be maintained by the City Surface Water Utility. The Utility would determine a maintenance schedule.

As noted in the EA/DEIS and FONSI, catch basins would be used to receive storm drainage from the streets, and also provide maintenance access. Catch basins have a sump so that solids that settle and heavier particles from the stormwater runoff can be trapped and then removed manually by maintenance personnel. Pollutants such as nutrients and some heavy metals can also adhere to particulates, which settle out and become trapped in the sumps. The City's maintenance personnel should clean these sumps regularly (professional literature suggests annual cleaning of each catch basin). For further information regarding the removal of roadway contaminants, please refer to Response ID 94.

The maintenance of detention ponds has not been discussed because this type of facility has not been included as part of the stormwater treatment facilities proposed for the project, as described in Response ID 168.

**Response ID: 163      Flocculation treatment**

***Responds to Comments: 43-3, 61-47***

Flocculation, as used in wastewater or water treatment plants, or batch unit processes for erosion control, is the coagulation of particles using chemical or electrical means, and then the particles “flocculate” together so they can either settle out or be physically filtered from the water stream as the particles get larger and more dense. These technologies which require the addition of chemical, electrical or mechanical sources to separate pollutants from the stormwater, and are not suited for general urban stormwater treatment.

Stormwater BMPs use the principles of gravity separating or filtration (as in ponds or vaults where the detention time allows for settling of particles, sand filters, or these new emerging technologies whereby separation occurs due to centrifugal forces of stormwater passing through). Stormwater vaults, ponds and these “emerging technology” devices have been shown in the literature to treat stormwater to the target levels (i.e., 80 percent removal of TSS). Studies have also shown that there is tremendous variability in the treatment rates as well for all these BMPs; therefore, “ranges” of treatment efficiencies are generally applied and accepted by the regulatory agencies.

It should be noted that vortex-gravity and/or vault system treatment devices would not remove antifreeze, pesticides, and most nutrients. Some nutrients, however, can be adsorbed onto solids particles, and then removed along with the solids as part of the treatment process.

**Response ID: 164      Cumulative effect of all development**

***Responds to Comment: 43-4***

The Comprehensive Plan Draft EIS for the City of Shoreline adopted on November 23, 1998, analyzed future land use development/growth on a citywide level, and have not been re-evaluated in EA/DEIS cumulative impact analysis. Projects that were included in the cumulative impacts analysis for the proposed project are described in the Summary in the EA/DEIS as well as in Appendix B – Relationship to Plans and Projects. The EA/DEIS cumulative impact sections look at the combined impacts of three additional projects. These projects are Aurora Avenue North from North 165th Street to North 205th Street, the Interurban Trail, and the Pedestrian Safety Demonstration Project. One additional project was considered in the FONSI—the King County Metro Bus Rapid Transit Project. These projects were selected for study because of their relationship to the Aurora Avenue 145-165 Project in terms of their proximity to the project and their effect on the movement of people and vehicles and the environment.

Cumulative impacts related to stormwater were evaluated based on the estimated combined impacts of this project, the Aurora Avenue North 165th to 205th Project, the Interurban Trail, and the Pedestrian Safety Demonstration project. Using available design information, increases and/or decreases in impervious surfaces were calculated for each of the affected basins. Assumptions on potential future stormwater facilities for the Interurban Trail and Aurora Avenue North 165th to 205th were made based on the fact that those projects would

be required to meet the stormwater and erosion control requirements of the City and of the Endangered Species Act. Because the design of stormwater facilities for these projects would be guided by these regulations, the stormwater-related cumulative impacts of these projects were judged to be minimal and potentially beneficial.

**Response ID: 165      Bioswale plants**

***Responds to Comments: 43-5, 61-50***

There is no plan to use bioswales for this project because there is no room for these long, vegetated strips in the built-out corridor. However, bioswales are acceptable methods for removing pollutants such as total suspended solids, some metals and nutrients, and are recommended as cost-effective methods to treat stormwater runoff. In general urban roadway runoff, heavy metals would generally be the primary toxic pollutants that could build up over a long period of time in the soils of the bioswale and then have to be removed. Maintenance of these could involve disposal of the soils in a landfill. The soil would only be considered “hazardous” if it did not meet the TCLP requirements for municipal landfill disposal, and then would have to be sent to a special facility.

Studies have shown residuals from stormwater pond sediments, catch basin sediments, and street sweepings tailings do not contain toxic substances with levels in excess of municipal landfill disposal requirements.

**Response ID: 166      Stormwater vault and detention pond sizes**

***Responds to Comments: 43-7, 43-9, 61-44, 61-49***

The City of Shoreline has adopted the *King County Surface Water Design Manual* (SWDM) for development and review of all drainage projects. All drainage designs shall meet the criteria set forth in the SWDM, which includes providing flow control (detention) and stormwater quality treatment for roadway redevelopment projects. In addition, the City has indicated that the criteria in the Washington State Department of Ecology’s 2001 *Stormwater Management Manual for Western Washington* (SMMWW) should also be used in selecting the stormwater flow control and quality treatment measures for the Aurora Corridor Project. The more conservative criteria from the two manuals (SWDM and SMMWW) are to be used.

Actual sizing and design of the stormwater conveyance, detention and treatment system will occur as part of the final design process. Detention facilities are required to be designed based on a continuous hydrologic simulation model, i.e. a computer model that estimates stormwater runoff flows from rainfall occurring across many years and not for just a single design storm. Both manuals agree on the design standard for the flows released from the detention facilities: durations of the flows released from the facility should not exceed the durations estimated for stormwater flows from the same area under predeveloped conditions for the range of flows from 50 percent of the 2-year peak flow up to the full 50-year peak flow. The predeveloped conditions will be forested land cover (a requirement of the SMMWW) for the area where there is a newly created in impervious surfaces.

Detention ponds have not been included as part of the proposed project’s stormwater treatment facilities for the reasons described in Response ID 168.



**Response ID: 167      Spill Control Plan, treatment facilities, and BMPs**

***Responds to Comments: 43-8, 64-37***

The contractor will have to prepare a spill control plan as required by the City of Shoreline and the Department of Ecology's Baseline General Permit for Storm Water discharges associated with Construction Activities for projects that disturb five acres or more. The Spill Control Plan is part of the minimum requirements necessary to comply with the permit, and would be incorporated into this project irrespective of the design alternative.

Treatment facilities are described in Response ID 45.

Specifics of treatment BMPs and Erosion Control BMPs would be developed during the final design processes. BMPs are discussed in Response ID 92.

**Response ID: 168      Detention ponds**

***Responds to Comments: 63-123***

Although detention ponds would be a preferred method to control and treat the stormwater flows from the Aurora Corridor, currently there does not appear to be a suitable available location on which to construct a pond. Therefore, underground vaults are likely the available option.

If land were available to incorporate stormwater ponds along Aurora Avenue between 145th and 165th Street, the designs of the ponds would meet the specific requirements in the King County Surface Water Design Manual and the Ecology Stormwater Management Manual for Western Washington. If detention ponds were built, they would be maintained by the City Surface Water Utility. The Utility would determine a maintenance schedule. The life span of a detention pond depends on the amount of stormwater it is designed to handle. If it is designed to handle stormwater volumes anticipated over the next twenty years, then its life span would be roughly 20 years before it would need updating.

See Response ID 45 for detailed information on design standards.

The oil/water separators planned for the specific "high-use" intersections (145<sup>th</sup> and 155<sup>th</sup>) in the project are more than just "Ts" – they are engineered systems designed to separate free oils from the stormwater. As long as the oils have not become chemically or mechanically emulsified, these separators would remove the oils to the design criteria performance concentrations. In order to remove dissolved oils and antifreeze (which is readily soluble in water) from the stormwater, advanced physical or chemical treatment units (such as in industrial wastewater applications) would have to be used, and are not applicable for general highway runoff treatment systems. Standard BMPs as well as the new emerging technology BMPs would not effectively remove these contaminants. More information regarding this topic is contained in Response ID 94.

**Response ID: 169      Landscaping**

***Responds to Comment: 49-1***

Two planting and paving schemes would be applied to the Aurora Corridor Project: the "green" treatment and the "urban" treatment. Potential examples of these treatments and the locations where they would be applied are shown in Figure 3-10 of the EA/DEIS. The urban treatment would be used in high-pedestrian areas, where trees, shrubs and

groundcover would be limited to center median. The green treatment would be used outside of the high-pedestrian areas; trees, shrubs, and groundcover would be planted in both the center median and the 4-foot amenity zone. The planting materials have not been selected yet, but one concept calls for the use of maple trees with varying hues of fall foliage.

**Response ID: 170      Median break locations**

***Responds to Comments: 50-2***

Under the Proposed Action u-turns and left-turns would be available for northbound and southbound traffic at each signalized intersection (145<sup>th</sup>, 152<sup>nd</sup>, 155<sup>th</sup>, 160<sup>th</sup>, and 165<sup>th</sup> Streets) as well as midblock near 163<sup>rd</sup> Street and at two locations between 152<sup>nd</sup> Street and 145<sup>th</sup> Street (see Figure 3 in the FONSI).

**Response ID: 171      Median break design**

***Responds to Comments: 50-3, 60-5***

The locations for openings have been established throughout the process of public involvement and design development. The assumed locations are based upon input from the public, the CATE, property owners, business owners and input from WSDOT. The locations are also greatly affected by proximity to intersections and alignment with driveways to major trip-generating land uses. Surveys of existing turn patterns from driveways have been conducted as a means to estimate potential left/u-turn volumes. The pocket lengths are based upon traffic forecasts with safety factors applied to assure adequate lengths for left-turn pockets. The actual length of each pocket varies depending upon projected demand for that particular location. The preliminary lengths have been established and reviewed preliminarily by WSDOT. The lengths vary from 50 feet to as long as 450 feet. Displays for the preliminary designs were shown at the EA/DEIS Public Hearing/Open House. The final design will follow WSDOT procedures to establish left-turn pocket designs. WSDOT will review and approve the design of the left-turn pockets prior to implementation. Figure 2-6 of the EA/DEIS and Figure 3 of the FONSI, "Median Access Concepts," shows the locations for median breaks.

**Response ID: 172      Bicycles in BAT lane**

***Responds to Comment: 50-4***

Bicyclists would be allowed, but not necessarily encouraged to use the BAT lane. It is assumed that these cyclists would "self-select" themselves based on their comfort and skill level with sharing the road with motor vehicles.

**Response ID: 173      Acronyms**

***Responds to Comments: 50-5, 50-12***

FONSI stands for Finding of No Significant Impact. In the NEPA Environmental Assessment process, it is a declaration that the project would have no significant impacts and that an Environmental Impact Statement would not be required.

Regarding SYNCHRO, EMME/2, VISSIM, these are not acronyms but rather product names of the software used to develop traffic forecasts (EMME/2) and perform traffic analysis (SYNCHRO – capacity analysis and signal optimization, VISSIM – simulation of traffic and transit operations).

**Response ID: 174      Traffic projections**

***Responds to Comment: 50-6***

Rates between 1.25 and 1.75 are typical of what is experienced throughout the region on existing State Highways that provide regional mobility. The text of the document has been revised to consistently reflect that this is the anticipated rate of increase for traffic volumes.

**Response ID: 175      Unclear terminology**

***Responds to Comments: 50-7, 50-18, 64-49***

Intersection geometry relates to the angle at which intersecting roadways meet (i.e. a right angle or regular intersection meets at 90 degrees and is perpendicular). It also describes the number of lanes, which movements are allowed, their length and width and other physical dimensions.

Minor approaches are those which serve measurably less traffic than the dominant or major approaches. These typically have fewer lanes than the major approaches and the lanes they do have will require shared movements (i.e. left, through, and right turns are all made from the same lane). In the case of Aurora Avenue, the major approaches are northbound and southbound Aurora Avenue.

Transit-supportive land uses generally include higher-density, mixed-use, urban developments that are pedestrian-oriented and are served by transit.

**Response ID: 176      Transit signaling priority**

***Responds to Comment: 50-8***

The signal equipment would be adapted to incorporate the capability to provide signal priority to transit vehicles. The extent of priority and under what conditions they would be provided have yet to be established. The likely scenario would be that the level of priority would be balanced with the need to limit operational effects on traffic flow. The City will consider using the suggested signage regarding signal timing.

**Response ID: 177      Transit travel time benefits**

***Responds to Comments: 50-10, 63-61***

Transit arrivals along the corridor would not be expected to deviate from the route schedules under the proposed project as they would under the No Action Alternative. Schedule reliability could improve between 1 and 1.5 minutes per run. This is mainly due to the fact that buses would stop in line (in the BAT lane) for passengers to board and alight rather than be required to pull out of the travel lane onto the shoulder and wait for a sufficient gap in traffic to return. Based on these improvements, transit under the proposed project would be expected to achieve a much higher mode share of trips along the corridor, especially during peak periods. An additional benefit of improved transit service efficiency is the ability of transit providers to provide more trips for the number of service hours. This would allow higher trip frequencies and, therefore, more transit capacity and overall person capacity in the corridor without additional operating costs.

Metro would also be implementing transit signal priority as a means to reduce transit delay at intersections.

**Response ID: 178      Has right-of-way acquisition process started yet?**

***Responds to Comment: 50-11***

The formal right-of-way acquisition process has not yet started. During the effort to develop and enhance the design for the two alternatives, assessment of preliminary right-of-way needs has been accomplished. Also, preliminary analyses of right-of-way costs have been accomplished. However, the formal right-of-way acquisition process would not begin until completion of the NEPA/SEPA environmental review.

**Response ID: 179      Sidewalk width requirements**

***Responds to Comments: 50-15, 63-69***

Aurora Avenue through Shoreline is designated as a National Highway System (NHS) route. Therefore, the minimum sidewalk width required by WSDOT guidelines is six feet. WSDOT sidewalk width guidelines are consistent with American Disability Act (ADA) regulations. In accordance with RCW 47.24.020(2), "The city or town shall exercise full responsibility for and control over any such street beyond the curbs..." Installing sidewalk with a width greater than six feet is at the discretion of the City.

**Response ID: 180      Amenity zone width**

***Responds to Comment: 50-16***

Absolute minimum dimensions for an "amenity zone" have not been established. When located adjacent to traffic lanes, fixed vertical objects should be two feet from the face of the curb. If that object is no more than one foot wide, that could suggest that three feet is adequate. Another consideration is the size of underground vault lids (which can be three feet wide). Ideally, landscaped strips should be at least three and one-half feet wide to enable plants to have growing space. Tree pits have a minimum size of four feet. All of these factors suggest a three-and-one-half-foot-wide, or a four-foot-wide desirable width for the amenity zone (measured from the back of the curb).

**Response ID: 181      Routing changes**

***Responds to Comment: 50-17***

Yes, owners and tenants would be informed of any routing changes. Please see the Mitigation Commitment List in the Attachment 4 in the FONSI. Tenants would be responsible for informing their delivery companies.

**Response ID: 182      Traffic delay at North 145<sup>th</sup> Street**

***Responds to Comments: 50-19, 64-30***

Level of service at North 145<sup>th</sup> Street worsens due to a number of factors: 1. Higher projected traffic volumes associated with the "build" alternatives due to the additional capacity; 2. U-turns and increased left-turns due medians add additional vehicle movement to the southbound approach; 3. More pedestrian crossings are assumed for the "build" alternatives.

No bottleneck would occur for southbound traffic at North 145<sup>th</sup> Street because traffic in the BAT lane will be required to turn right. Buses in the BAT lane could continue through the intersection to the bus stop on the south side of the intersection before merging into general traffic. The two southbound general purposed lanes also continue south of North 145<sup>th</sup>.

Because there is no bottleneck here, there is also not an air quality effect associated with a bottleneck scenario.

**Response ID: 183      Metros Bus Rapid Transit program**

***Responds to Comment: 50-20***

Metro strongly supports the concept of BAT lanes and proposes to improve (increase) service along Aurora in the future, before and after completion of the project. Metro has identified the implementation of BRT (Bus Rapid Transit) as a “highest priority” project in their newly adopted 6-Year Transit Service Implementation Plan. The status of Metro’s consideration of Aurora Avenue as a corridor for Bus Rapid Transit has been addressed in the Transportation section of the EA/DEIS in the Summary Chapter under the heading “Description of other Major Actions,” and in Appendix B –Relationship to Plans and Projects and considered in the impacts discussion in the FONSI.

**Response ID: 184      Lighting improvements in Alternative B**

***Responds to Comment: 50-23***

The statement on page 3-44 in the EA/DEIS refers only to special lighting for pedestrians at high pedestrian activity locations. This was assumed only because there would be no place within the seven-foot sidewalk to locate the poles. Alternative B would include roadway lighting.

**Response ID: 185      Sales tax impacts**

***Responds to Comments: 50-25, 61-38***

The impact on sales tax revenues resulting from construction of the project is very difficult to quantify because of the proprietary nature of sales information and the variety of factors that impact sales activity. Unpredictable factors other than the construction of the project may impact sales tax revenue (i.e. general state of the economy, management decisions, market forces).

Retail sales data for each business is proprietary information and was not available for this analysis. Sales tax data was presented for the incorporated areas of Shoreline from 1996 through 1999, including businesses located in the Aurora Villages area.

**Response ID: 186      Property tax impacts**

***Responds to Comment: 50-26***

For the range of build alternatives considered, the initial decrease in property tax revenues to the City as a result of the proposed project would range from \$555 to \$1,086. The Proposed Action would have an initial decrease in property taxes of \$868. Property tax impacts are described further in the Economics section of Chapter 3 in the EA/DEIS and Attachment 3 in the FONSI.

**Response ID: 187      Cluster existing businesses**

***Responds to Comment: 50-33***

Clustering businesses into a mini-mall is well outside of the scope of this project and could only be organized by existing property owners.

**Response ID: 188      Positive results of other similar projects**

***Responds to Comment: 50-35***

The purpose of this document is to analyze the potential impacts of this project. It is not meant as an advertisement to “sell” the project. However, data from similar projects has been used to support statements of positive and negative impact. For example, Parsonson et al.’s study on the safety effects of replacing an arterial two-way left-turn lane with a raised median was cited to support the anticipated reduction in accidents resulting from the proposed project.

**Response ID: 189      HOV lane in Predesign study**

***Responds to Comments: 50-36, 50-39***

Thank you for your suggestions. BAT lanes are a subset of the concept of HOV lanes. As the concepts were developed, the lane use eligibility was more specifically identified as Business Access and Transit. The more comprehensive term, “HOV,” was appropriate for this particular discussion in Appendix B. Acronyms were defined at their first use; a comprehensive acronym list was not included in the EA/DEIS.

The project termini discussion in Chapter 2 does say that BAT lanes exist south of 145th Street in Seattle. The rationale for using BAT lanes is documented in the Predesign Study (which can be viewed at the Shoreline City Clerk’s office). Because the benefits of BAT lanes were discussed in the Predesign study, they were not discussed in the EA/DEIS to minimize the document’s size.

**Response ID: 190      Design alternatives**

***Responds to Comment: 50-37***

NEPA and SEPA require that a range of reasonable alternatives be examined, but not that all alternatives be examined. The City has included two “build” alternatives in the EA/DEIS that it believes represent the endpoints of a range of possible designs that would still meet the project’s stated purpose and need. The City has used the discussion of impacts contained in the EA/DEIS, the recommendations from the Value Engineering study, and comments provided during the environmental process to improve alternatives A and B. The types of design alterations suggested in the comment were considered. Alternative A Modified has been proposed in the FONSI as a result of the review of public and agency comments and the value engineering study.

Through the design process, the roadway alignment was adjusted slightly east and west in order to minimize impacts to private property. Different sidewalk widths were considered, but sidewalks narrower than six feet were eliminated from consideration because Aurora Avenue’s status as a National Highway System (NHS) route requires at least six foot wide sidewalks (this is also the ADA recommended minimum). Sidewalks wider than eight feet (not counting an amenity zone) would have too many impacts on private property.

Many businesses already use land behind their buildings for parking while others simply don’t have the room or proper access. Reconfiguration of parking behind buildings only has been considered where it currently exists for each parcel.

**Response ID: 191      “Before and After” table**

***Responds to Comment: 50-38***

Thank you for your suggestion. Tables have been used throughout the document as often as possible in order to display comparative impacts between alternatives. A comprehensive before and after table has not been prepared for the EA/Final EIS; however the text does describe existing conditions and potential future conditions for the different elements of the environment.

**Response ID: 192      Tunnels and overpasses**

***Responds to Comment: 51-3***

No tunnels or overpasses have been proposed as a part of the alternatives in the EA/DEIS. Grade-separated pedestrian crossings were eliminated from consideration as part of the corridor design based on a combination of cost, right-of-way impacts, impacts to business access, and pedestrian security and comfort. Refer to Response ID: 293 for more discussion regarding pedestrian tunnels and overpasses.

**Response ID: 193      Socioeconomic Impacts and Impacts to Businesses**

***Responds to Comment: 52-2, 52-3***

Although SEPA has no formal socioeconomic analysis requirements (WAC 197-11-448: the term “socioeconomic” is not used in the statute or in the SEPA Rules because the term does not have a uniform meaning and has caused a great deal of uncertainty), NEPA does have Social and Economic analysis guidelines. The EA/DEIS document, meeting the needs of both SEPA and NEPA, has a discussion of social and economic impacts as outlined by NEPA.

The Economics section of the EA/DEIS describe the potential impacts to businesses, including cumulative impacts. An economic impact assessment of the Proposed Action is in Attachment 3 of the FONSI. Issues discussed include access, property acquisition, signage, parking, tax revenue, and impacts during construction. Most land acquired from private properties is composed of a narrower strip of frontage along Aurora Avenue; none of the parcels will be reduced to uneconomic remnants. In situations where parking stalls are lost, legal parking spaces can be recovered by reorienting and restriping parking lots. Sufficient parking will be available for each business in compliance with City parking codes. See Attachment 4 in the FONSI for a full list of committed mitigation measures for this project.

**Response ID: 194      Thornton Creek data**

***Responds to Comment: 55-1***

Thank you for your comment. The first paragraph under the Thornton Creek section of the EA/DEIS is not correct. The mainstem of Thornton Creek is not piped under the Northgate Mall. Also, the drainage area (according to the Thornton Creek Watershed Characterization Report) is 7,402 acres, not 7,200 as stated in the EA/DEIS. The branch our project will be ultimately discharging to is the North Fork of Thornton Creek via a small western tributary to the North Fork. The correct information was taken into consideration during preparation of the FONSI.

The basin boundary of Thornton Creek as delineated in the EA/DEIS and as shown in the City of Seattle’s Thornton Creek Characterization Report, is located off the eastern side of

the roadway edge from 145th Street north to 155th Street, parallel to the roadway. Just south of 155th Street, the basin boundary turns east, and then north again a few block east of Aurora Avenue along Stone Way. We have verified this delineation along Aurora Avenue using the GIS topographic contours, and by assessing the constructed drainage system. From the crown of Aurora Avenue to the east edge of the street, storm drainage is collected in the subsurface drainage system via catch basins and pipes, and conveyed down the hill toward 155th Street, where an interceptor storm sewer takes drainage west towards the ditch adjacent to the Denny's Restaurant at North 155<sup>th</sup> Street and Westminster Way. There, stormwater enters a large trunk sewer that eventually flows toward Carlyle Hall Road and then to the headwaters of Boeing Creek.

Our basin delineation shows that the only portion of Aurora Avenue that is in Thornton Creek watershed under current conditions are portions of the intersections with 145th Street and 152nd Street along Aurora Avenue. If historical information shows that the watershed's boundaries are different than current conditions, that is most likely due to urban development and constructed drainage systems altering the natural surface flow patterns. However, as stated previously, the SWDM specifically states that for development projects, the current drainage system must be preserved. Therefore, we are required to preserve the current drainage areas in the Boeing Creek and Thornton Creek basins as part of the future design, and are not allowed take flows from one basin and route them another one.

The drainage from the 145th Street section and 152nd Street section that currently flow to Thornton Creek, enters the stream channel just east of Wallingford Avenue and North 153rd Street. This fork of the stream channel flows into Twin Ponds which is on the North Fork of Thornton Creek.

**Response ID: 195      ESA protection and requirements**

***Responds to Comments: 55-4, 58-3***

Chinook salmon have been listed as threatened under the ESA. Changes in stormwater discharges to streams used by chinook salmon can have a negative impact on the fish and its habitat. Therefore, projects located in basins that drain to streams with chinook salmon are required to submit to NOAA Fisheries a Letter of No Effect or a Biological Assessment documenting whether there would or would not be an impact. The project is located in two basins that drain to downstream creeks used by Chinook salmon.

At present, NOAA Fisheries has not published definitive regulations for determining whether a project would or would not cause a loss of chinook salmon habitat. The Washington State Department of Transportation (WSDOT) is working with NOAA Fisheries to develop criteria applicable to WSDOT's road projects. Currently, WSDOT's draft, revised *Highway Runoff Manual* (HRM) includes the ESA criteria under discussion with NOAA Fisheries. For a project's stormwater quantity and quality treatment measures to be identified as having no effect on fish habitat (i.e., Protective Design Level ), the draft HRM requires the following in terms of water quality and quantity:

1) Water Quality:

EITHER



Stormwater runoff from all new impervious surface areas and an additional existing impervious area that is at least 40 percent of the total new impervious area would receive water quality treatment. (known as the 140 percent rule)

OR

Stormwater runoff from an area sufficiently large receives water quality treatment so that a mass balance calculation shows there would be no increase in the pollutant loading in the discharge downstream of the treatment facility. At present, the calculation is based on concentrations and removals of total suspended solids.

AND

## 2) Water Quantity:

Stormwater runoff from all new impervious surface areas would go to a stormwater detention facility. If the detention facility is designed based on individual design storm events using the Santa Barbara Urban Hydrograph (SBUH) method, then an ESA volume correction factor must be applied to uniformly enlarge the detention facility after the preliminary design is completed. The ESA volume correction factor is calculated as  $[1.22 + 0.0039 \times (\text{percent of the site that is impervious})]$ . If the detention facility is designed based on a continuous simulation modeling method (such as the King County Runoff Time Series (KCRTS) or Hydrologic Program Simulation FORTRAN (HSPF) models), then no volume correction factor is required.

For the Aurora Avenue 145th to 165th project, the proposed stormwater quantity and quality treatment measures to be constructed as part of the project would satisfy the Protective Design Level requirements of the draft HRM. We are proposing to provide treatment for all new AND redeveloped pollutant-generating impervious surfaces within the project footprint, which is much greater than the 140 percent of NEW [only] impervious surfaces. Also, we are using the KCRTS hydrologic model to design the flow control facilities.

Based on the foregoing information documented in the EA/DEIS, it was found that the environmental impacts on water quality and salmonids resulting from this project would have no significant negative impacts. In fact the proposed action (construction of Aurora from 145th to 165th) would improve water quality. In an action unrelated to the Aurora 145-165 project, the City is currently updating its Critical Areas Ordinance in compliance with the state Growth Management Act.

**Response ID: 196      Stormwater Treatment and Conveyance Upgrades of Existing and New Surfaces**

### ***Responds to Comment: 55-5, 55-6, 58-4***

The entire Aurora Avenue conveyance system from N 145<sup>th</sup> Street to N 165<sup>th</sup> Street will be totally rebuilt and upgraded as part of this project. Because the roadway widths and

locations of new curbs will be changed, an entirely new subsurface storm drainage system with catch basins will be constructed as part of the roadway redevelopment project. The conveyance system would be upgraded to handle storm flows for the 25-year storm event in accordance with WSDOT standards. Because in many areas, offsite drainage enters the Aurora Avenue conveyance system, the new storm drains would be sized to handle these flows as well.

As described in the EA/DEIS and Response ID 45, most of the existing stormwater drainage from the project limits flow to the Boeing Creek Basin. Only few small areas of the redevelopment project do not drain to Boeing Creek: the redevelopment of the 152<sup>nd</sup> sidestreet and 145<sup>th</sup> sidestreet (east side) drains to the Thornton Creek basin, and the redevelopment of Aurora Avenue south of 145<sup>th</sup> Street drains to the West Lake Washington basin. For both existing and proposed conditions, storm drainage for the Aurora Corridor and offsite areas within the Boeing Creek basin will be routed to the existing 48-inch storm drain trunk line that flows deep below the Aurora Square shopping center. Eventually, this storm drain flows into Boeing Creek along Carlyle Hill Road. Drainage from the redeveloped roadway system (this includes new and redeveloped impervious surfaces) will be first routed through a series of treatment and detention systems, and then will be routed to the existing 48-inch storm drain.

We are aware of existing conveyance/flooding problems near the area around Stone Avenue and Midvale Avenue, between 160<sup>th</sup> Street and 167<sup>th</sup> Street (and the Darnell Park area). These capacity problems would be relieved by the upgraded system on Aurora Avenue.

The City's 2003-2008 Capital Improvement Program includes a Surface Water Capital Fund category of projects. In 2003, the City will initiate a Surface Water Comprehensive Planning process. This process will identify potential stream enhancement projects in drainage basins.

Stormwater runoff from highly urban areas can cause natural temperatures of streams to be elevated, primarily due to the lack of shading and loss of cooler groundwater from entering the streams due to increased impervious surfaces. Within the project area, the existing land cover consist primarily of impervious surfaces (see Response ID 45). The land cover for the proposed conditions will be similar to that under existing conditions with the exception of a small net increase in the total impervious surfaces for each of the build alternatives. The proposed piping, treatment and detention systems would not be able to "cool" the heated surface, therefore temperatures in the streams likely would not change under proposed conditions.

The available data does not indicate that Boeing Creek is impacted by elevated temperatures. If, however, new data indicates the stream is impaired due to temperatures, the "fix" would be more of a basin-wide solution, such as planting vegetation along the riparian sections of the stream to promote cooling, installing woody debris in the streams to create pools for improved habitat, and promoting more infiltration of the urban runoff throughout the basin to help increase the groundwater flows to the stream (which are cooler than surface flows). A Basin Plan for Boeing Creek should address the temperature issues and provide basin-wide recommendations to improve the conditions.

**Response ID: 197      Response ID revised**

***Responds to Comments: A-17-12***

Comment 63-67 was inadvertently assigned to wrong the Response ID in the FEIS; this has been corrected in the FONSI - please refer to Response ID 26 for the correct response.

**Response ID: 198      Twin Ponds impacts**

***Responds to Comment: 55-12***

Less than 1.0 acre of impervious surface is being “redeveloped” in the Thornton Creek Basin (which represents 0.012 percent of the entire drainage area of Thornton Creek). The existing area within the project footprint is mostly impervious roadway or sidewalks, and would be relatively unchanged under proposed conditions. The EA/DEIS (Tables 3-34 and 3-35) and the FONSI (Table 10) show the various pavement additions under each build alternative. For this “increase” in paved areas, detention vaults would be constructed to control the rate and duration of the additional flows due to the increase in paved areas, and preserve the existing flow patterns. Because these areas represent such a very small portion of the entire drainage basin, the impact likely would be undetectable.

Drainage from these affected areas flows to the Twin Ponds, but the future flow rates should be less than under current conditions due to the construction of flow control facilities. The decreased flow rates would limit the potential for inundation of Twin Ponds.

**Response ID: 199      Missing appendices C, D, and E**

***Responds to Comment: 56-2***

We apologize for inadvertently omitting Appendices C, D, and E from the EA/DEIS at the beginning of the comment period. The appendices, listed below, were mailed by the City to all purchasers of EA/DEIS within 1-3 days after issuing the EA/DEIS. All remaining copies of the EA/DEIS were updated to include the three appendices.

- Appendix C is the List of Principal Contributors,
- Appendix D is the List of Discipline Studies Performed, and
- Appendix E is the EA/DEIS Distribution List.

None of these is critical in regards to a review of the EA/DEIS by the public. They contain no information regarding descriptions of the alternatives or impacts. The minimum public comment review period for a NEPA EA and a SEPA DEIS is 30 calendar days. The agencies and public had 38 calendar days from the issue of the EA/DEIS to the date that comments were requested. Even with the 1-3 day delay for receipt of the omitted Appendices, the review time met all legal requirements.

**Response ID: 200      Mail copies of EIS**

***Responds to Comment: 56-4***

In order to keep mailing costs down, the City did not mail the EA/DEIS out to individuals. Instead, the City mailed a postcard and a newsletter to every address in the City announcing the release of the EA/DEIS, and listing where it was available for review or purchase. The EA/DEIS was available for review at the City, WSDOT and FHWA offices, and City libraries. The City does not have a record of a request from Ms. Stephens for a copy to be mailed to her. Comments on the EA/DEIS have been received from Ms. Stephens;

therefore, the City assumes that she obtained a copy and had sufficient time to review the document.

**Response ID: 201      Outflow impacts and location**

***Responds to Comment: 58-2***

This information will be taken into consideration during final design.

The Stream Basin Characterization has been an ongoing project for the City of Shoreline over the past few years. The Final Draft of the Stream Basin Characterization report has been available for public comment since March 2003. Copies are available in the City Clerk's office for public review and purchase. The Final Draft Report is currently being reviewed for "any new scientific information." Once that review is completed, the Shoreline Planning Commission will then undertake its final review and will report to the City Council its finding and conclusions.

The City has expressed a desire to provide treatment for all new, replaced and existing pollutant-generating impervious surfaces within the project area. Currently, stormwater runoff from the roadway surfaces within the project area goes untreated to the Boeing Creek and Thornton Creek, whereas under proposed conditions, stormwater from all the roadways surfaces will receive basic treatment. This would be result in a substantial reduction of pollutant loadings to the streams. These stormwater treatment facilities would most likely be manufactured stormwater treatment devices such as vortex or gravity-type separators or stormwater filter systems installed in vaults. These facilities are expected to be installed under the roadway and/or sidewalk in the immediate vicinity of the detention facilities. Stormwater treatment devices are typically designed to achieve the target 80 percent removal of total suspended solids. Actual removal efficiencies of each of these types of constructed facilities vary as described in the literature and the manufacturers data.

**Response ID: 202      Limited-access highway**

***Responds to Comment: 60-1, 64-15***

The limited-access highway concept was analyzed in the Predesign Study (which can be viewed at the Shoreline City Clerk's office) and rejected from consideration after that analysis. The limited-access highway was rejected as an alternative because it did not perform well environmentally, provided no economic benefit to the corridor, drew traffic off of I-5, and did not meet most of the purpose and needs of the project. Furthermore, the limited-access highway was not requested as an alternative during the scoping period for this EA/DEIS and therefore did not receive specific attention. For further discussion of the restricted viability of the limited-access highway concept, please refer to the Predesign study.

**Response ID: 203      U-turn orientation**

***Responds to Comment: 60-2***

Just like a left-turn across traffic, a u-turn movement is started while facing oncoming traffic. This is true whether the turn is made at a signalized intersection or in a turn pocket. The same number of lanes is crossed.

**Response ID: 204      Two-way left-turn lane safety**

***Responds to Comment: 60-3***

Although some vehicles use a two-way left-turn lane for acceleration to merge into traffic, vehicles are endangered by other vehicles using the two-way left-turn lane in the other direction. U-turns would be able to be made either at intersections where a red light would hold oncoming traffic, or from turn pockets when there are breaks in traffic caused by signal operation. Left-turn access is currently restricted with a traffic curb for approximately 40 percent of the project length. Left-turn access for the two-way, left-turn lane is difficult due to high traffic volumes. Neither pedestrian nor traffic safety would be improved if the two-way left turn lane remains intact. The median provides a safe refuge for pedestrians when crossing at marked crosswalks. For vehicles, it mitigates unsafe crossing, merging, and diverging conflict points in a high traffic area.

**Response ID: 205      Traffic analysis**

***Responds to Comment: 60-6***

Quantitative traffic flow analysis was completed for each of the proposed alternatives, as well as for the No Action. The first page of the Transportation section of Chapter 3 in the EA/DEIS indicates that corridor operations and intersection Level of Service were evaluated using the computer model SYNCHRO; that traffic diversion was evaluated using the City's EMME/2 travel demand model; and that transit operational factors were evaluated using VISSIM micro simulation traffic simulation software. The results of these analyses are described throughout the Transportation section.

**Response ID: 206      Consolidated left-turn traffic**

***Responds to Comment: 60-7***

With two-way, left-turn lanes, there is no focus for left-turn location. Therefore, the location where left turns and conflicting movements may occur is unpredictable to drivers. Focusing left and u-turns at fewer locations with a median is being proposed as part of the solution to reduce conflict points and improve overall traffic safety. The u-turn volumes at the focused locations would not be heavy volumes. The locations where u-turns would be heaviest would be at signal-controlled locations. Safe u-turns at uncontrolled locations would require that u-turning vehicles wait for gaps in traffic flows/platoons. The median openings at uncontrolled locations would be located adjacent to driveways at high trip generating land uses, so those openings would serve left turns as well as u-turns.

Due to the provision of u-turns at signalized intersections, an overlapping green arrow for right turns during left/u-turn signal phases would not be provided. Right-turn-on-red traffic must yield to conflicting through and u-turn movements. Signage would be included in the intersections to alert right-turning drivers. This does have an affect on intersection capacity, and this operation has been simulated and reflected in the Year 2020 LOS results. Table 1 in the FONSI shows that all intersections except for North 145<sup>th</sup> Street and Aurora would operate above LOS F in the year 2020. This intersection operates at LOS F in the No Action Alternative as well in year 2020. Therefore, u-turns will not cause failing levels-of-service at intersections. Also, protective-permissive signal operations will not be used for left- and u-turn signals.

**Response ID: 207      Reduce speed or install lights only**

***Responds to Comment: 61-2***

The purpose of this project is to improve the safety of all users on Aurora Avenue North (SR 99) in the City of Shoreline from North 145th Street to North 165th Street with improved channelization, access management, and pedestrian amenities, and to improve the multimodal mobility with a proposed northbound and southbound Business Access/Transit (BAT) lane. The project is needed to accommodate future regional and local demands on the facility and to support the community goals set forth in the *City of Shoreline Comprehensive Plan* (City of Shoreline, November 1998). While reduced speed and additional lights could increase the safety of motorists and pedestrians, these measures alone would not improve channelization, provide pedestrian amenities, improve multimodal mobility, or accommodate future regional and local demands on the facilities.

data.

**Response ID: 208      Preferred Alternative won't work**

***Responds to Comments: 61-5, 61-55, 61-58***

At this time this comment was written, the City had not yet designated a preferred alternative. The proposed action was voted on by the Shoreline City Council following the release of the SEPA FEIS. On December 9, 2002, the Shoreline City Council adopted Resolution No. 201, which selected Alternative A Modified as the design for the project.

The City has chosen to prioritize the improvements to Aurora Corridor based on the availability of funding. Aurora Avenue North from 145-165 with the greatest need (such as highest traffic volumes and greatest number of accident locations) has been given top priority and is fully funded. The City continues to plan for the Aurora Avenue North 165-205 project (see the City's Capital Improvement Program) subject to financial feasibility. The Aurora Avenue North 145-165 Project can be built to maintain flexibility for the design of the Aurora Avenue North 165-205 project.

Both alternatives studied in the EA/DEIS and the proposed action contained within the FONSI would be an improvement in traffic conditions compared to the No Action Alternative. Please see Response ID 158 regarding LOS improvements and mobility, Response ID 56 for safety improvements, Response ID 47 for capacity and mobility improvements, and Response ID 39 and 53 for information on impacts to businesses. Sidewalks will be reduced where building structures would otherwise be impacted; portions of buildings will not be removed to make room for sidewalks. These impacts are also discussed in Attachment 3 of the FONSI.

**Response ID: 209      Mitigation in project description**

***Responds to Comments: 61-8, 61-14,***

Sidewalk modification and parking lot reconfiguration are measures that reduce or eliminate identified impacts. They are not considered a part of either alternative and therefore are not included in the description. Similarly, effects such as parking loss are described in detail in Chapter 3 because they are considered impacts of the proposed alternatives and not an actual feature of the alternatives themselves. The stormwater facilities are considered a part of all build alternatives as mentioned in the alternative descriptions on pages 2-14 and 2-18 of the EA/Draft EIS. A more detailed description of the

stormwater facilities for both build alternatives has been added to the project description provided in the Finding of No Significant Impact (FONSI). The project description in the FONSI specifically states, “The stormwater drainage system would include a new collection and conveyance system, improved water quality facilities to treat the roadway stormwater collected, and oil-water separators located at high-volume intersections including North 145th Street and North 155th Street. In addition, detention facilities would be incorporated in the project, improving stormwater detention for Aurora Avenue North runoff.”

**Response ID: 210      Project dimensions and cost**

***Responds to Comment: 61-9, 61-15***

The width of the existing corridor and lane configuration, as well as those of the build alternatives, are shown in Figure 2-2. The purpose of the environmental impact statement is to disclose potential environmental impacts. Therefore, the costs of the alternatives are not discussed in EA/DEIS; however, decision-makers consider both the environmental effects and costs of an alternative when making a final alternative selection.

**Response ID: 211      Illogical endpoint**

***Responds to Comments: 38-6, 60-13, 63-57, 64-63***

The project termini are described in detail on pages 2-2 through 2-5 of the EA/Draft EIS. A summary of that discussion is provided here.

The proposed project includes the portion of Aurora Avenue North (North 145th Street to North 165th Street) that currently has the highest average daily traffic volumes in the City of Shoreline, the highest driveway density, and many of the most congested intersections. In addition, the proposed project includes five high-accident locations and three pedestrian-accident locations, and has a crash rate that exceeds other portions of Aurora Avenue North in the City of Shoreline. The project limits were set to include the intersections at the project termini and to provide adequate lane transition lengths to match existing lanes while at the same time minimizing cost and environmental impacts. The northern terminus was set at North 165th Street to incorporate major trip-generating land uses and to accommodate that traffic within the project limits. The intersection has also been included because it experiences high congestion and is the vicinity of both a high-accident location and a pedestrian-accident location. The southern terminus of the project was set at North 145th Street. This southern terminus is logical because it is located at a signalized intersection that serves as an access point for traffic flow from North 145th Street/SR 523 and onto Aurora Avenue North, and will provide continuity with the existing northbound BAT lane on Aurora Avenue North from North 115th Street to North 145th Street. The proposed project would improve conditions on Aurora Avenue North from North 145th Street to North 165th Street without requiring additional improvements to the north and south on Aurora Avenue North.

**Response ID: 212      Clarify text**

***Responds to Comments: 61-16, 61-57, 63-68, 63-98, 64-90***

The text has been revised to correct the errors.

Usage of the word “preponderance” was solely the author’s choice is was meant to convey that several of these uses exist on Aurora Avenue. The word has been changed to “several.”

“SR 9” has been corrected to read “SR 99.”

The reference should have directed the reader to Chapter 4 in the EA/DEIS. There is no Chapter 6.

In Table 3-50 in the EA/DEIS, the Quest Inn should be labeled “NO” because it is not a land use likely to generate hazardous materials.

**Response ID: 213      Interurban Trail location**

***Responds to Comment: 61-18***

The sentence in the EA/DEIS to which the comment refers is mentioning three projects in the sentence – “(1) the Interurban Trail, (2) improvements from North 165th Street to North 205th Street, and (3) the Pedestrian Safety Demonstration Project.” The previous reference that mentioned the Interurban Trail existing between North 165th Street and North 205th Street has been deleted from the document to clarify that the Interurban Trail begins at North 145th Street. It is understood that the Interurban Trail would travel from North 145th Street to North 205th Street within the City of Shoreline.

**Response ID: 214      Pedestrian Safety Demonstration Project**

***Responds to Comment: 61-19***

Since this passage was written, the Pedestrian Safety Demonstration Projects at 165th and 170th Streets have started construction and are mostly complete. The paragraph in the EA/DEIS states that “each of these projects has or will undergo its own environmental documentation process.” This does not necessarily mean that an EIS was written, only that project-specific environmental approval was conducted.

**Response ID: 215      Degree of land use impacts**

***Responds to Comment: 61-22***

The Land Use section of Chapter 3 of the EA/DEIS states that Alternative A would acquire 0.79 acre of new right-of-way and that Alternative B would acquire 0.47 acre of new right-of-way. The Proposed Action would acquire 0.65 acre of new right-of-way. This would impact 64 compliant and 25 non-compliant parking spaces out of 2,014 total spaces. The project could replace 15 of the 64 compliant parking spaces by restriping and realigning existing parking areas. Property to be acquired would mostly be in narrow strips along the existing Aurora Avenue right-of-way. This impact has been judged to be minor because only a small percentage of parking spaces will be lost and no buildings would be displaced.

**Response ID: 216      Recreation amenities**

***Responds to Comment: 61-29***

The section mentions recreational amenities that are in close proximity to the North 145th Street to North 165th Street project area only. This includes the Interurban Trail, which continues all the way to North 205th Street.

**Response ID: 217      Waterbody impacts**

***Responds to Comment: 61-30***

Impacts to the waterbodies (Boeing Creek, Thornton Creek, Twin Ponds, Green Lake, etc.) that flow through these areas and basins (Boeing Creek Basin, Thornton Creek Basin, and



West Lake Washington Basin) that encompass these areas are covered in the surface water/water quality section of the EA/DEIS. Impacts of the proposed action are also detailed in Attachment 3 of the FONSI. These impacts are summarized below.

The expected impact for Thornton Creek Basin under proposed conditions would be negligible because the developed foot print is so small in comparison to the drainage basin size, and the fact that stormwater controls will be included to treat all the runoff from the redeveloped surfaces, and provide flow control for the newly created impervious surfaces. The installation of the stormwater quality treatment facilities in the Thornton Creek Basin might provide a slight improvement in the water quality of the receiving streams, but because the proposed project area within these basins is so small relative to the total drainage area in these basins, the improvements are not expected to be discernible.

Currently, the stormwater from Aurora Avenue enters Boeing Creek with peaking seasonal high flows that create erosion and sediment travel. Additionally, no water quality management strategies currently exist to treat stormwater from Aurora Avenue. By design, this project would detain and treat stormwater to current (2002) regulatory standards, thus improving overall water quality as well as the aquatic habitat in Boeing Creek. In the West Lake Washington (Densmore) Basin there would be no change in impervious areas, so the peak flows and volumes of stormwater runoff delivered to the downstream system should be unchanged and would not affect aquatic habitat in the basin. The installation of the stormwater quality treatment facilities in the West Lake Washington (Densmore) Basin might provide a slight improvement in the water quality of the receiving streams, but because the proposed project area within these basins is so small relative to the total drainage area in these basins, the improvements are not expected to be discernible.

Also see Response ID 194 and 198.

#### **Response ID: 218      Regional and community growth**

##### ***Responds to Comments: 61-31***

The Growth Management Act (GMA) implemented by the City of Shoreline and King County determines regional and community growth through the various elements of the GMA, and local comprehensive and zoning plans. The proposed transportation project is in conformance with these City and County plans, and would not cause or promote growth but would accommodate it in conformance with those plans. Cumulative impacts are also addressed in the EA/DEIS and FONSI.

#### **Response ID: 219      Short-term economic impacts**

##### ***Responds to Comment: 61-34***

The impacts referred to in this passage are construction impacts, which are short-term; they end once the act of construction is over. Construction impacts include beneficial impacts, such as construction spending, as well as adverse impacts, such as reduced access and increased congestion. The level of adverse impact is not substantial because most businesses can adjust staffing and other variable costs as needed to remain viable during a period when revenues may decline resulting from a reduction in customers during construction. Also, the City would commit to measures to mitigate construction impacts to businesses. Additional signage, public notice of business hours, and maintaining access to all businesses would be provided by the City.

**Response ID: 220      Store front impacts**

***Responds to Comment: 61-36***

The comment is referring to impacts reported for the “cumulative impact” scenario.

There are no impacts on buildings within the proposed project limits. Sidewalk widths have been reduced to prevent possible building conflicts. Removal of “store fronts from buildings that would abut or overlap the new expanded right-of-way property line” would not be required for the Aurora Avenue 145th to 165th project. Direct impacts caused by other projects will be analyzed and mitigated during separate project level environmental processes for those projects.

Individual properties may develop to a higher use independent of this project.

**Response ID: 221      Construction spending**

***Responds to Comments: 61-37, 63-109***

The existence of indirect and induced effects from construction spending are a well-documented impact of transportation projects. While benefits associated with localized spending by construction workers can be expected, the amount is difficult to quantify and is anticipated to be small. For information on the application of input-output analysis to construction projects, see: Leontief, *Input-Output Economics*, 2d ed. (New York, Oxford University Press, 1984), and *Regional Multipliers, A User Handbook for the Regional Input-Output Modeling System (RIMS II)*, 3rd Edition. U.S. Department of Commerce, Bureau of Economic Analysis, 1997.

**Response ID: 222      Economic benefits related to safety and mobility**

***Responds to Comments: 61-39, 63-110, 64g-1, 64m-1***

There are numerous studies on the impacts that mobility and safety have on the economy. See, for example, Bell and McGuire, *NCHRP Report 389, “Macroeconomic Analysis of the Linkages between Transportation Investment and Economic Performance.”* Transportation Research Board, National Research Council, Washington, D.C. 1997.

Transportation is a cost of doing business for firms engaged in the selling of goods, and transportation costs are reduced as mobility improves. Businesses pay insurance premiums to cover their drivers and property: at the margin, improvements in safety result in fewer crashes and lower premiums. The efficient movement of goods, services, employees, and customers is dependent on an uncongested transportation system. Access and movement are expected to improve with the operation of this project, and therefore, the stated analysis does not apply. Part of the proposed project’s purpose is to help business activities along the corridor.

**Response ID: 223      Spill Control Plan and BMPs**

***Responds to Comment: 61-51***

The contractor will have to prepare a spill control plan as required by the City of Shoreline and the Department of Ecology’s Baseline General Permit for Storm Water discharges associated with Construction Activities for projects that disturb five acres or more. The Spill Control Plan is part of the minimum requirements necessary to comply with the permit, and would be incorporated into this project irrespective of the design alternative.

Specifics of treatment BMPs and Erosion Control BMPs would be developed during the final design processes..

The stormwater treatment facilities would be sized during final design. For planning purposes, these facilities would be underground vaults and structures situated primarily at two locations: the intersection of Aurora Avenue and N 155th Street, and Aurora Avenue and N 160th Street. Storm Drainage from all the redeveloped roadway areas would be routed through these subsurface units for treatment prior to discharge into the downstream conveyance system. These units would be designed to treat flows up to the “water quality design storm”, which accounts for 95 percent of the average annual runoff volume from the roadway footprint.

**Response ID: 224      Existing stormwater flows**

***Responds to Comment: 61-52***

The existing storm drainage system has been mapped using field surveys and existing reports. The current storm drainage network is a closed system of pipes and channels that contains the roadway runoff and routes stormwater runoff toward North 160th Street and North 155th Street. Stormwater does flow into ditches near North 155th Street and Westminster Way, possibly providing some infiltration, but most of the stormwater is conveyed into the large storm sewer trunk under the parking lot of the Aurora Square Shopping Center. This storm sewer trunk eventually discharges to an open channel southwest of the intersection of Carlyle Hall Road and Greenwood Avenue North, which is the beginning of Boeing Creek. From there Boeing Creek flows generally west to a detention pond (M-1 Pond).

Stormwater flows from existing conditions will be modeled further, and designs will include appropriately sized facilities so that future flow rates and durations will match existing conditions. Erosion and flow control measures will be designed to protect salmon and high erosion creek channels as necessary.

The soils in the project area have been preliminarily identified as till soils with low infiltration capability. No areas within the project limits have yet been identified that have soils suitable for an infiltration facility. Therefore, infiltration is not expected to be used as a flow control measure.

**Response ID: 225      Hazardous waste in stormwater traps**

***Responds to Comment: 61-53***

These stormwater traps (assuming the commenter is referring to basic catch basins, the oil/water separators, and the larger stormwater treatment devices) would need to be cleaned out at regular intervals. The City contracts for services to clean the City’s constructed storm drain system. Service contractors are required to transfer waste material to a METRO-approved decant station where the waste material is tested for hazardous content prior to disposal at a State-authorized facility. Studies have shown residuals from stormwater pond sediments, catch basin sediments, and street sweepings tailings do not contain toxic substances with levels in excess of municipal landfill disposal requirements. Water quality analyses for environmental documents do not typically address toxic waste in stormwater runoff; the primary concerns are typically pollutant loads and hydraulic impacts.

**Response ID: 226      Clarify traffic volume data**

***Responds to Comments: 61-67, 61-70***

The volumes presented in Table 2-1 in the EA/DEIS represent Average Annual Daily Traffic (AADT) volumes. Therefore these numbers have been averaged for all 365 days in the year (i.e. including weekends and holidays) and are lower than Average Weekday Traffic volumes. AADT volumes are used when accident rates are to be calculated. That is because accident data are collected for all 365 days in the year, so the same corresponding traffic data must be used for accident rate calculations. These traffic data are from actual counts taken at the locations identified, and adjusted to AADT volumes using WSDOT's seasonal and annual adjustment factors for Shoreline.

The Levels of Service for the intersection with Aurora at North 16th Street and 165<sup>th</sup> Street are presented for existing conditions in Table 1 in the Transportation section of the FONSI. The LOS at 160<sup>th</sup> is 'D', and the LOS at 165<sup>th</sup> is 'F'. The operations at 160<sup>th</sup> are affected by all four of its approaches because it is a signalized intersection. Your comment regarding the LOS for the 165<sup>th</sup> intersection being attributed to the side streets is correct. The transportation industry method for LOS analyses of unsignalized intersections focuses on the delay to the stop controlled approaches at those intersections. For discussion on the LOS analyses of the intersections, and about the unsignalized intersection LOS, please see Response ID: 5.

**Response ID: 227      Traffic volumes at North 160th Street**

***Responds to Comment: 61-78***

Figure 3-1 in the EA/DEIS illustrates the influence of Shoreline Community College access to Aurora Avenue North throughout the day as well as the amount of traffic that enters/exits the corridor at North 155th Street/Westminster Way. Figure 3-1 shows existing traffic volumes and intersection level of service during the p.m. peak hour of traffic. Unlike the other intersections within the project area, traffic volumes at the Aurora Avenue North and North 160th Street intersection are heaviest during the a.m. peak hour rather than p.m. peak hour. The Aurora Avenue North and North 160th Street intersection experiences high a.m. traffic volumes because many vehicles are turning left from northbound Aurora Avenue North onto westbound North 160th Street in order to get to Shoreline Community College. Vehicles leave Shoreline Community College over an extended period, so a similar p.m. peak does not occur.

**Response ID: 228      Traffic counts for Shoreline Community College**

***Responds to Comment: 61-81***

The traffic forecast data includes trip generation for Shoreline Community College assuming the level of traffic while it is in session.

**Response ID: 229      Metro service**

***Responds to Comment: 61-87***

Official Comment letter Log # 57 from King County Metro demonstrates support for the project by mentioning the importance of the project improvements for enhancing speed and reliability for transit service, and in its interest in providing additional service along Aurora

Avenue. Below are statements taken directly from Comment letter #57, from King County Metro, which demonstrates their support for the project:

“On behalf of King County Metro Transit, I want to offer our support for the City of Shoreline’s proposed improvements to Aurora Avenue North between N 145<sup>th</sup> and N 165<sup>th</sup>.”

“Looking to the future, the Aurora corridor is ripe for additional transit service investments. As financial resources become available, it would be our hope that service levels could be enhanced, particularly during the midday and on weekends.”

“In closing, we urge the city to move forward with final design and construction of the proposed redevelopment project between N. 145<sup>th</sup> and N. 165<sup>th</sup>.

**Response ID: 230      Bus rides during construction**

***Responds to Comment: 61-88***

During construction, transit would be a viable transportation alternative for people who are going to locations served by Metro Route 358 or served by routes with transfer points with Metro Route 358. Transit is not suggested as the only solution, it is provided as one alternative which would help reduce auto trips during periods of closure or reduced roadway capacity. As transit use increases and auto trips decrease, traffic flow improves for all roadway users not just transit users.

**Response ID: 231      Relocation and water quality cumulative impacts**

***Responds to Comment: 61-90***

The passage that is being commented on is describing construction impacts. Construction impacts are short-term temporary impacts caused by the act of building the project. Potential displacements along Aurora Avenue North were identified as a part of the cumulative impacts analysis. Cumulative impacts look at the combined effect of reasonably foreseeable past, present, and future projects. Cumulative impacts are generally described in qualitative terms but every effort has been made to state quantified impacts where available data exists. Displacements have been estimated using the most current designs available for other projects. No displacements are associated with the Aurora Corridor Project 145-165.

Specific water quality facilities have not yet been designed for the other projects; therefore a quantification of impacts is not possible. An understanding of the guidelines to which these projects would be designed has been used for the cumulative impacts discussion on water quality.

The Aurora Corridor Project 145-165 does include both stormwater detention and treatment facilities. This is discussed in detail in Response ID 45. The Proposed Action’s project area includes 767,500 square feet in Boeing Creek basin, 40,000 square feet in Thornton Creek basin, and 8,900 square feet in West Lake Washington Basin (see Table 10 in the FONSI). These numbers differ from those shown in the EA/DEIS because the Proposed Action has a slightly different footprint than both Alternatives A and B. The Proposed Action will increase impervious surfaces by 1,200 square feet in the Boeing Creek basin and 1,100 square feet in the Thornton Creek basin. However, the amount of pollutant-generating impervious surface (impervious surfaces used by vehicles that leave pollutants like oils and metals) would decrease by 58,200 square feet in the Boeing Creek basin and by 1,400 square feet in the Thornton Creek basin. This is because portions of Aurora Avenue that are currently

accessible by car (the wide shoulders and two-way left-turn lane) will be converted to a non-pollutant generating impervious surface (such as a sidewalk) or to a pervious surface (such as the landscaped amenity zone or median). There would be no change in impervious surfaces in the West Lake Washington Basin. This information is included in Attachment 3 in the FONSI. Stormwater facilities will be designed for each basin affected by the project in accordance with the most current design manuals and anticipated changes in impervious surfaces.

**Response ID: 232      Residential property values**

***Responds to Comment: 61-91***

In the Land Use section of Chapter 3, the EA/DEIS states that, “Although the magnitude of Alternative A’s effects on property values is difficult to estimate, it appears that the proposed improvements to Aurora Avenue North could produce both positive and negative impacts on residential properties.” This is not a statement that the project would “depress residential properties” but an acknowledgement that the project would create factors that tend to decrease residential property values as well as factors that tend to increase residential property values.

**Response ID: 233      Bike and pedestrian impacts**

***Responds to Comment: 63-3***

The sentence from the EA/DEIS that the comment refers to is intended to mean that there are no adverse impacts to pedestrian and bicyclist facilities; this has been clarified in the FONSI. The proposed action would improve safety and capacity. No formal bicycle lanes are included as a part of the proposed action.

**Response ID: 234      Bike lanes**

***Responds to Comments: 63-4, 63-108***

Please refer to the City of Shoreline Comprehensive Plan for City plans to accommodate bicycle travel throughout the City of Shoreline transportation system. The street system throughout the City of Shoreline is available for bicycle use. The Capital Improvement Program includes investments to add bike lanes and other features to support bicycle travel. The Interurban Trail project would be developed to accommodate bicycle travel. Bicyclists may use the outside lanes of the Aurora project as described in the alternatives and also the sidewalks. Throughout the development of the options and alternatives for the Aurora corridor, the City, other agencies, the CATF, and the general public considered all possible facilities and components for inclusion within the alternative designs. Adding formal bike lanes would increase the width of the cross-section for each alternative by 8-to-10 feet. This additional width would increase the construction and right-of-way acquisition costs, increase environmental impacts, and cause significant impacts on property/business owners.

The City recognizes that there are more than one bicycle markets that need to be served within the transportation system. These markets are generally classified as recreation, utility, and fitness cyclists. The City, by providing a number of parallel bicycle routes with a varying degree of separation between other modes, allows each bicyclist to self-select which route is most appropriate to use based on that individual cyclist’s travel characteristics, trip purpose and comfort level and experience. Given the variety of options for bicyclists (use of

alternative streets, use of the Interurban Trail, use of the BAT lane, and use of the sidewalk), the City anticipates very low bike volumes on the sidewalks, and therefore little conflict between bikes and pedestrians.

**Response ID: 235      Safety along Aurora Avenue**

***Responds to Comment: 63-5***

Chapter 2 in the EA/DEIS describes both the purpose and need for the project and also why the project termini are rational. It is logical and appropriate for the City of Shoreline to implement a project that will improve safety in an area that has the greatest safety need. Figure 2-1 shows that Aurora Avenue from 145<sup>th</sup> Street to 165<sup>th</sup> Street has a higher accident rate than the rest of Aurora Avenue in Shoreline. Because the stretch of Aurora Avenue North from 145<sup>th</sup> Street to 165<sup>th</sup> Street has a higher accident rate, improvements to that section are the highest priority. Although the design for the Aurora Avenue North 165<sup>th</sup> to North 205<sup>th</sup> Street Project has not been developed, it would incorporate safety improvements.

**Response ID: 236      Safety is compromised elsewhere**

***Responds to Comment: 63-7***

Safety is not being compromised anywhere along the corridor, or anywhere else in the City of Shoreline. The City of Shoreline Comprehensive Plan includes a list of transportation projects throughout the City to improve safety as well as to address other transportation problems. As planned, the City intends to pursue implementation of these projects subject to financial feasibility. The amenities listed in the comment are included in the Proposed Action so that the project will address its stated needs and objectives. The Aurora Avenue Project between North 165<sup>th</sup> Street and North 205<sup>th</sup> Street is one of the projects that the City hopes to undertake in the future.

**Response ID: 237      No Action Alternative definition**

***Responds to Comments: 63-8, 64-38***

A "no action" alternative is required by NEPA. FHWA guidance states that the "no-action alternative normally includes short-term minor restoration types of activities that maintain continuing operation of the existing roadway." The No Action Alternative considered in the EA/DEIS and FONSI includes short-term minor construction necessary for continued operation of the existing roadway facility and minor safety improvements as required. The No Action Alternative also includes other currently funded or planned transportation improvements projects identified in the City of Shoreline Capital Improvements Program that are expected to be in operation in the project area by 2020. Sidewalk and lighting installation along the entire length of the project area is not a defined part of the City's Capital Improvement Program nor are they considered short-term improvements. As such, there was no reason to include sidewalks and street lighting as part of the No Action Alternative. The description of the No Action Alternative does say that sidewalks would be installed as private redevelopment occurs.

**Response ID: 238      “Unsightly” commercial strip**

***Responds to Comment: 63-10***

The description is a reflection of comments received from the public during open houses for this project. It came in response to a question posed to the public on what they thought of when they thought of Aurora Avenue. The description is not a comparison to any other part of the City of Shoreline.

**Response ID: 239      Safety comparison**

***Responds to Comment: 63-12***

The accident rate shown for comparison is not the “overall state average.” The rate provided for comparison is the average for “Urban Principal Arterials.” The purpose for showing this rate for comparison is only to show how the rate for accidents on the existing Aurora Avenue roadway compares to the average and to show that the accident rates for much of Aurora Avenue are substantially worse than the average. Accident rates on roadways vary as a result of geometric conditions, traffic volumes, and traffic speeds. The lack of access control, high traffic volumes, and high traffic speeds on commercial urban arterials like Aurora Avenue, result in accident rates that are higher than the state average.

**Response ID: 240      Existing conditions for bicycles and pedestrians**

***Responds to Comment: 63-13***

The sentence in the EA/DEIS that the comment is referring to is describing the current travel conditions for bicycles and pedestrians. Along Aurora Avenue North from North 145th Street to North 165th Street, sidewalks are sporadic and the Interurban Trail has not yet been built. This means that currently bicycles and pedestrian have few dedicated areas for safe travel.

**Response ID: 241      Comprehensive Plan details**

***Responds to Comments: 63-14, 63-30, 63-38***

This information comes from the City’s Comprehensive Plan which anticipates that jobs will result from growth and redevelopment in the City and was not developed by this project. Questions regarding the Plan’s policies should be directed to the City of Shoreline’s Planning and Development Services department.

Sidewalks as part of a comprehensive transportation system support the use of transit as a viable mode of transportation. Sidewalks provide a pedestrian right of way, which facilitates access to businesses from transit stops, parking locations and surrounding neighborhoods.

**Response ID: 242      Business types**

***Responds to Comment: 63-15, 63-16, 64-48***

No businesses would be displaced as a part of the Aurora Avenue 145-165 project. The City’s Comprehensive Plan provides a description of the City’s vision of the corridor. The City would like to see vibrant healthy businesses that serve the needs of local citizens and motivate owners to reinvest in their property along Aurora Avenue North in accordance with comprehensive plan goals. The text has been revised to more accurately reflect the businesses currently in operation from North 145th Street to North 165th Street. These



businesses are primarily auto-oriented businesses types (including offices, self storage, service, automobile repair, and mini-casinos), and are not the planned transit supportive land uses envisioned by the City's Comprehensive Plan and GMA goals. These businesses are likely supported by City of Shoreline residents and residents of neighboring cities.

**Response ID: 243      Largest employers in the City of Shoreline**

***Responds to Comment: 50-24A***

The City of Shoreline has approximately 125 employees. Other top employers in the city are Shoreline Community College, Washington State Department of Transportation, Shoreline School District, Christian Ministries, Costco, and Home Depot.

**Response ID: 244      Driveway spacing**

***Responds to Comment: 63-19***

The portion of the EA/DEIS cited by this comment is a summary discussion. The sentence noted says : "Within this class, access management measures such as minimum driveway spacing of 250 feet and installation of measures to mitigate turning, weaving, and crossing conflicts that affect safe travel." The word "such as" is used to explain that a few examples would be included within the sentence. The paragraph and the sentence should not imply that every measure within the long list of possible access management measures would be listed in the paragraph.

While this portion of the EA/DEIS document (Chapter 1 Purpose and Need of Proposed Project) was not intended to describe the City's policies and approach for establishing driveway designs and spacing, through this response to this comment, the following clarification is provided. The City intends to apply State and City guidelines when developing the designs and spacings for driveways. The City supports the point made in the comment, that "Nonconforming connection permits may be issued to provide access to parcels", and that "one access point shall be provided to an individual parcel or to contiguous parcels under the same ownership." As discussed in many prior presentations and meetings with the public and at City council meetings, the project alternative designs would be developed to maintain access to parcels. The City and WSDOT would work with property owners and business owners to develop adequate driveway access. The City believes that the State and City guidelines allow sufficient flexibility to accomplish adequate access points to properties.

**Response ID: 245      Transit data**

***Responds to Comments: 63-24, 63-85, 63-93***

Substantial transit research information is available regarding the factors that riders feel are important to use of transit. See leading industry reference book entitled: "Public Transportation", by Gray & Hoel, Chapter 22. Factors that are generally common to most research findings include safety, comfort, accessibility, reliability, costs, and efficiency. King County Metro has identified similar factors with its surveys of the public and has been working to address those factors in their Six-Year Plan. The existing conditions on Aurora which negatively affect the potential for transit use include: lack of safety for patrons waiting along the shoulder for buses; lack of sidewalks for patrons to walk safely to transit stops; uncomfortable conditions and poor environment for patrons at transit stops; lack of street lighting which makes potential patrons concerned for their security and safety; lack of

shelters combined with frequent numbers of days of precipitation; unpaved areas in the transit stop locations; difficult accessibility due to lack of sidewalks; transit schedule reliability problems due to traffic delays, and inability for buses to reenter traffic from shoulders at bus stops; longer travel time partially due to traffic delays; and ADA accessibility is difficult.

King County Metro currently plans to contribute \$500,000 towards the project. King county will also furnish upgraded bus shelters along the route. Metro also plans to gradually increase service, especially during off-peak periods, starting in September 2003. The most current service plan for the 358 route provides 68 transit trips in the southbound direction (to downtown Seattle) and 68 trips in the northbound direction (to the Aurora Village Transit Center) per weekday. A recent ridership sample taken in January of 2003 indicates that 365 boardings per day are made at stops along Aurora Avenue North between North 145<sup>th</sup> Street and North 165<sup>th</sup> Street. As the improvements to Aurora Avenue North that are proposed in this project are designed to meet needs 20 years into the future, current transit ridership data is only partly relevant to the decision of what alternative is best. Current ridership is more useful in determining where and what type of transit shelters or stops should be located to meet existing needs. Transit signal priority equipment which had been installed on a number of intersections along Aurora Avenue North were only a test demonstration, and the Aurora project must include the permanent installation of this equipment. Therefore future benefits from transit signal priority treatments can only be claimed with the action alternatives. Although transit vehicles are granted right of way to enter traffic as a "rule of the road" (RCW 46.61.220) this law is frequently violated by general traffic and buses must wait before pulling into traffic.

Passenger vehicles could be removed from the traffic flow by encouraging drivers of passenger cars to ride the bus when possible. Considering the expected available capacity on buses making trips along Aurora Avenue, this would equate to 30 to 35 passengers on average per bus if all capacity were used by drivers shifting their trips to transit.

**Response ID: 246      Safety improvements**

***Responds to Comments: 63-25, 63-37, A-11-1***

The Proposed Action has been developed to address a broad set of objectives. These objectives include the State objectives cited: "WSDOT has this corridor as a critical need in its 20-year plan," "is considered a high priority," is "critical to statewide and regional intermodal mobility needs." In addition, other objectives have been addressed such as providing for transit and pedestrian needs, adding person-moving capacity, and improving the aesthetics and image of the street. The Proposed Action would address all of these objectives in an approach which balances the extent to which an objective is met with other objectives such as reducing environmental impacts.

The Proposed Action would provide increased vehicular capacity by adding Business Access and Transit lanes, adding lanes at intersections, and reducing vehicle conflicts. The project also would improve traffic and pedestrian safety by reducing traffic conflicts including focused left-/u-turns lanes, and development of formal driveways and reduced /consolidated driveways, and by providing signals at 152nd Street and 165th Street to enable safer traffic access onto Aurora from side streets and to allow for safer pedestrian crossings. The project would support regional intermodal mobility needs by adding bus

zone improvements, providing Business Access and Transit lanes, providing sidewalks for improved access to transit, and lighting to improve security for transit riders. The project would provide improved pedestrian access by adding sidewalks and lighting, and the Proposed Action would improve the environment for pedestrians by including a landscaped amenity zone buffer between the sidewalk and the roadway. Other features such as wider than absolute minimum sidewalks (“ADA is 5 feet” while the Proposed Action has a 7-foot sidewalk); landscaping in the median rather than concrete barriers and asphalt ; and undergrounding of utilities address other objectives for the project. Refer to Chapter 1 for information on all objectives for the project. Also see Appendix B, Relationship to Plans and Projects, for more information on the broad extent of objectives to be addressed by the project, including the 32 points identified by the CATF.

One point of clarification regarding Comment 63-25, none of the alternatives include a 17-foot-wide planted median. The proposed action includes 4-foot-wide median adjacent to left-turn pockets, which is approximately 70 percent of the project length. At locations between left-turn pockets (only 30 percent of the project length), the medians are 15 feet wide. Even if concrete barriers were used instead, there would be locations between left-turn pockets where the medians would be at least 15 feet wide (the width of the left turn lane, which is 12 feet, plus the width of a concrete barrier, which is 3 feet).

The Proposed Action provides pedestrian improvements that would make the corridor safer for pedestrians. Pedestrian safety improvements along the corridor include continuous sidewalks; pedestrian-scaled lighting; and improved pedestrian crossings, including signalized street crossings and median refuge islands at all pedestrian crossings. The primary purpose of the median is to provide a safe refuge area along the center of the roadway for vehicles making focused left-turns and u-turns and for pedestrians crossing the roadway.

The Proposed Action would also provide pedestrian amenities, such as landscaping, that would make the corridor more pleasant for pedestrians. The landscaping combined with placing the utilities underground would improve the aesthetics of the corridor and provide a sense of identity, which could in turn help to attract businesses and customers to the area.

**Response ID: 247      Independent utility and benefits of project**

***Responds to Comments: 63-26, 63-27, 63-31, 63-51***

The proposed project would improve the movement of people and goods through the 1.2-mile stretch of Aurora Avenue North encompassed by the project. While other portions of Aurora Avenue North would benefit from similar types of improvements, the City has needed to prioritize the implementation of these improvements due to funding constraints. Aurora Avenue North from North 145th Street to North 165th Street has the greatest demonstrated need for the proposed improvements, given that it has higher traffic volumes and a greater number of accident locations than any portion of Aurora Avenue North within the City of Shoreline.

The transportation benefits that would result from the project would directly improve the movement of people and goods within the project area and would incrementally improve the movement of people and goods throughout the region by decreasing delays within that

portion of the regional trips. The transportation benefits that would accrue as a result of the proposed project are discussed in detail in the EA/DEIS and are summarized here.

The average delay at intersections within the project area following project implementation would be 55 seconds, which is more than ½ minute less than the delay estimated for the No Action Alternative. The improvement would occur as a result of increased capacity provided through improved signal improvements and intersection geometry, as well as additional lane capacity in the corridor for business access and transit.

The additional signals proposed would have a semi-actuated operation and would have green indications for north-south traffic unless demands for left/u-turns or from side streets occur. Also, additional approach lanes have been added at intersections to increase capacity. All traffic signals would be interconnected and have a coordinated operation.

Capacity for moving people would also be added by including Business Access and Transit (BAT) lanes and other transit amenities to improve transit speed and reliability, therefore enabling more people to access and use transit. Access management treatments, such as the raised median and the BAT lanes, would help improve traffic flow by reducing the number of conflicting traffic movements.

The BAT lane would also make entering and exiting businesses safer and easier for customers. Improved transit access could improve the convenience and desirability of surrounding commercial properties. Increased pedestrian activity could increase the patronage of adjacent retail uses.

The goals and objectives stated for the proposed project are for the proposed project and not the complete length of Aurora Avenue North through the City of Shoreline. The benefits of the proposed project will accrue primarily to the businesses and neighborhoods in the immediate vicinity of the project; however, the transportation benefits of the proposed project will also have an incremental benefit to the regional transportation system.

**Response ID: 248      Project definition**

***Responds to Comments: 63-29***

The City has chosen to prioritize the improvements to Aurora Corridor based on the availability of funding. Aurora Avenue North from 145-165 with the greatest need, such as highest traffic volumes and greatest number of accident locations, has been given top priority and is fully funded. The City continues to plan for the Aurora Avenue North 165-205 project (see the City's Capital Improvement Program) subject to financial feasibility. The Aurora Avenue North 145-165 Project can be built to maintain flexibility for the design of the Aurora Avenue North 165-205 project.

**Response ID: 249      Economic Conditions**

***Responds to Comment: 63-30***

These statements have come from the City's Comprehensive Plan and were not developed by this project. Questions regarding the Plan's policies should be directed to the City of Shoreline's Planning and Development Services.

One of the goals of the City of Shoreline Comprehensive Plan, and planning in general, is to improve quality of life and support a strong and sustainable economy within the City. The

term “quality of life” is generally meant to convey ideals such as a strong economy, healthy schools, and a sustainable environment. A diverse economy is one that is not overly reliant on a particular industry; it has a balance of different business sectors.

The existing character of Aurora Avenue is described in the City’s Comprehensive Plan:

“At public workshops considering the future of the City, Aurora Avenue has been described by Shoreline residents as a ‘hodgepodge,’ and ‘the place you love to hate.’ It is a classic suburban American strip, with a wide right-of-way and large parking lots fronting the street. The Aurora Corridor has a few large buildings, many smaller ones, and wide distances between structures. Approximately 75% of the area within the Corridor is used for parking or driving automobiles. The predominant visual character of the strip is derived from its automobile orientation and from visual elements that are common to such development (e.g., low rise buildings, sign, and lack of pedestrian improvements.”

The Comprehensive Plan is a City document that goes through a yearly amendment process. The character assessment of Aurora Avenue contained within the document is not based on racial demographics. It is merely a reflection of the land uses in the area. The desired character for Aurora Avenue North – one with higher densities and transit-supportive land uses - is determined by the City’s Planning and Development Services department, in conjunction with the City Planning Commission and the City Council.

**Response ID: 250      Citizens Advisory Task Force (CATF) purpose**

***Responds to Comment: 63-41***

CATF was not a board; it was an ad hoc committee appointed by City Council. The CATF was charged with establishing a design concept for Aurora 145-205. CATF was not asked by Council to advise on funding or the project limits of construction. See also Response ID 83.

**Response ID: 251      BAT lane origins**

***Responds to Comment: 63-43***

The term Business Access and Transit (BAT) lanes was used for this project to simplify the description of these lanes for the public. Fact sheets and other newsletters have been presented to the public to explain the concept. The concept for these lanes is not new. The outside BAT lanes would be for right turns and transit vehicles. Therefore they would serve as auxiliary lanes for right turning vehicles at driveways and at side streets (essentially an access management treatment), and would allow transit vehicles to operate in the lanes. These lanes are operating at hundreds of locations in various forms throughout the U.S. and the world. Similar lanes are in operation in the Puget Sound including on SR99 in the Cities of SeaTac and Seattle, SR 18/348<sup>th</sup> Street in Federal Way and SR 522 in Seattle/Kenmore/Bothell. WSDOT has found the safety performance for these existing lanes to be acceptable when they are accommodated by reduced number of driveways, along with center raised median treatments. Refer to literature developed by the National Academy of Sciences/Transportation Research Board Committee for HOV Systems (see HOV Systems Manual, NCHRP Report 414, chapter on arterial street HOV treatments), and Committee for Access Management (NCHRP Report 420) for more information on various arterial street applications for transit, and applications for access management. A new Access Management Manual was published in July 2003 that provides information on the use of access management tools.

**Response ID: 252      Transit use and BAT lane relationship**

***Responds to Comment: 63-45***

The comment implies that the transit-related improvements are being implemented as an attempt to reduce automobile traffic. This comment does not apply to the Proposed Action for the Aurora Avenue 145th to 165th Project or the alternatives considered in the EA/DEIS. The transit-oriented improvements for the Aurora project are being implemented to provide a balanced, multimodal transportation corridor. This would provide more choices for those who choose to or have to use other travel options. The transit-oriented improvements include improvements to bus zones, improved sidewalks to enable access to transit, improved lighting at bus zones to provide improved security for transit users, Business Access and Transit lanes for improved transit speed and reliability, and transit signal priority treatments to improve transit speed and reliability. These transit-oriented features would not replace but would augment automobile travel facilities. Also, the Business Access and Transit lanes would not be “transit only”. Other vehicles accessing properties and businesses or side streets, would be using those lanes. The quotes from England are not relevant to this project. For more information on HOV and transit features for urban street projects, refer to the Transportation Research Board, HOV Systems Manual (NCHRP Report 414).

**Response ID: 253      Relevance of Florida BAT lane impacts**

***Responds to Comment: 63-46***

Concerns such as: increased impervious surfaces; wider roadway feel; affect on aesthetics; use of the Business Access and Transit lanes as through lanes; and safety of right turn lanes, have all been considered by the City, other agencies, the CATE, and the public while developing the project alternatives during the Predesign Study (which can be viewed at the Shoreline City Clerk’s office) and again for this study. These have been important concerns throughout this project and are incorporated in the various project objectives. Many issues were considered to address all of the objectives for the project. The issue of impervious surface has been addressed by including some pervious areas such as the amenity zone and the median. Improving the safety and aesthetics for the corridor has been addressed through the inclusion of utility undergrounding, landscaped amenity zone and median, and with special paving materials. The aesthetics of the corridor are being addressed through utility undergrounding, landscaping, and other urban design treatments. The safety of the roadway and pedestrians is being addressed by reducing traffic conflicts through access management treatments, developing sidewalks, developing safer pedestrian crossings, and enabling safer traffic access to the roadway from side streets at 152<sup>nd</sup> Street and 149<sup>th</sup> Street. The Business Access and Transit lanes would enable right turning traffic to make turns away from higher speed through traffic. The outside lanes would be signed and striped to clearly indicate that traffic must turn right at driveways or at side streets. Also, the Business Access and Transit lanes would be continuous so that confusion would be avoided. This would be an improvement over the design for the outside lanes on the recent project built on SR 99 in Lynnwood/Edmonds/Snohomish County.

**Response ID: 254      “safety lane”**

***Responds to Comment: 63-47***

The term “safety lane” was a CATF interpretation of a desire to have protected turns from the center of the roadway.

**Response ID: 255      Signals and pedestrian crossings**

***Responds to Comment: 63-50***

The description of Alternatives A and B in the EA/DEIS clearly states that there would be five signals for Alternative A and six signals for Alternative B. Please see the description of alternatives in Chapter 2 in the EA/DEIS. The FONSI includes a description of the Proposed Action. The Proposed Action would have five signals. Pedestrian crossings would be limited to the locations of these signals. Pedestrians could activate the crossing signals.

**Response ID: 256      PALS and HALS data**

***Responds to Comment: 63-52***

WSDOT’s 2002 evaluation of state highways identified three High Accident Locations (HAL’s) and two Pedestrian Accident Locations (PAL’s) within the project limits. In 1999, this roadway within the proposed project limits had an accident rate of 7.69 accidents per million vehicle miles. In 2000, this rate increased to 8.79 accidents per million vehicle miles. The statewide average for Urban Principal Arterials in 2000 was 2.52, down from 2.61 in 1999. Aurora Avenue through Shoreline experiences an accident rate over three times the state average for urban principle arterials. The accident rate for this corridor is going up while the statewide average is going down.

**Response ID: 257      DUI crashes**

***Responds to Comment: 63-53***

This project is intended to address vehicle and pedestrian safety, not DUIs. However, safety and channelization improvements would improve safety for drivers. Drunken driving is a serious problem and police enforcement and strict alcohol laws are appropriate tools for dealing with DUIs; roadway design is not. Drunken drivers are a hazard to everyone regardless of lane configuration. The grant money secured for this project is specific to roadway and transit improvements and can not be spent on police.

**Response ID: 258      Crash severity**

***Responds to Comment: 63-55***

The majority of crashes are in fact property damage only. WSDOT’s most recent accident data (1999-2001) shows that 59 percent of the reported accidents were property damage only. However, property damage accidents can substantially impact traffic flow and do cause added congestion. During the same time period (1999 through 2001) 41 percent of the accidents involved injuries.

The 145<sup>th</sup>-to-165<sup>th</sup> Streets project limits experience high accident rates and have unsafe conditions. Traffic safety improvements are a primary element for the proposed project. Regarding the need for safety improvements in the vicinity of N. 152<sup>nd</sup> Street, the project includes a new signal at N. 152<sup>nd</sup> Street along with changing driveway access to/from the McDonalds site to align with this intersection. This is a more comprehensive solution and is

being proposed to reduce the accident potential; enable reasonable access to Aurora and adjacent businesses; allow safer pedestrian crossings; and enable protected u-turns.

**Response ID: 259      Pedestrian data**

***Responds to Comments: 63-60, 63-78, 63-80***

The perceived lack of pedestrians along Aurora Avenue is partially due to the dangerous and uncomfortable pedestrian environment. Under current conditions, pedestrians are forced to walk along the shoulder of the roadway with nothing separating them from traffic. In most areas the illumination is spotty and insufficient.

Pedestrian traffic counts were not conducted because their value was not apparent vis-a-vis pedestrian safety or project design. With respect to project design, the construction of any roadway improvements for Aurora Avenue North within the project limits requires the construction of sidewalks because the roadway is designated as a National Highway System route. In providing these sidewalks, the City wants to provide a safe and pleasant pedestrian environment. For the same reasons, the following types of data were not collected: pre- and post-construction traffic counts for similar types of projects and travel rates on Aurora Avenue between North 145th and North 165th Streets following the completion of the Interurban Trail.

Concerns regarding pedestrian safety were identified in part by accident data. As stated in the EA/DEIS (page 2-3), the project limits include three Pedestrian Accident Locations (PALs) in assessments made by WSDOT in 1998 and 2000. The PALs are located in the vicinities of North 145th Street, North 152nd Street, and North 165th Street. The number of pedestrians involved in accidents on Aurora Avenue North between North 145th Street to North 165th Street from January 1, 1999, to December 31, 2000, is provided in Table 3-4 of the EA/DEIS. This table shows that 92 injury collisions occurred and that 5 pedestrians were involved. The table also shows that 1 fatality and 117 injuries resulted from these collisions but does not indicate if that fatality was a pedestrian; however, it is likely that the 5 pedestrians were among the 117 injured. Data on the contributory negligence of pedestrians to accidents was not sought because the information it provided would not change the reasons for the project or its design.

As noted previously Aurora Avenue North, into and through Shoreline, is designated a National Highway System (NHS) route. This designation requires a sidewalk that is at least 6 feet wide. In accordance with RCW 47.24.020(2), "The city or town shall exercise full responsibility for and control over any such street beyond the curbs..." Installing sidewalk with a width greater than 6 feet is at the discretion of the City. The proposed project would have a sidewalk at least 7 feet wide.

The proposed project would separate pedestrians from traffic with a 6-inch curb and a 4-foot amenity zone. The 6-inch curb and 4-foot amenity zone would provide a greater safety advantage to pedestrians than paved shoulders because the curb would provide a vertical separation and the amenity zone would provide a horizontal separation. These separations could slow down errant vehicles, giving the driver an opportunity to regain control of the vehicle within the 4-foot space and pedestrians the opportunity to react and get out of the way. The buffer would also help pedestrians avoid stepping off the sidewalk and curb into high speed traffic and/or getting hit by overhanging parts of vehicles, such as rear-view



mirrors. WSDOT agrees that a buffer zone between the travel lanes and sidewalk on this facility would be beneficial for pedestrians.

Please also refer to any highway design guideline (AASHTO, WSDOT Design Manual, etc.) regarding whether or not conditions for pedestrians are safer or more comfortable on a sidewalk separated by an amenity zone in comparison to pedestrians on a shoulder directly adjacent to 40 mile per hour traffic. The “International Boulevard Sidewalk Impact Study” conducted by the Center for Applied Research on International Boulevard Phase 2 provides findings that support the alternatives developed for the Aurora Avenue 145th to 165th project. For example, the International Boulevard Study indicates that the frequency of jaywalking would be reduced when safe crossing locations are provided.

Whether or not jaywalking is legal in the City of Shoreline is not pertinent to the project. People jaywalk in communities where it is illegal. The proposed action would provide safe crossing locations not currently available. If a pedestrian choose to jaywalk following project completion and got caught halfway across the street, the pedestrian could at least wait within the raised median separated from traffic rather than in the two-way left-turn lane.

**Response ID: 260      Code parameters set alignment**

***Responds to Comment: 63-62***

The portion of Aurora Avenue between 165th and 205th will undergo separate environmental analysis. The scoping process will not only be dictated by code requirements, but will include the opportunity by the public to identify what should be studied. For example, the City has heard testimony that grade separated interchanges should be studied at North 175<sup>th</sup>, North 185<sup>th</sup>, and North 192<sup>nd</sup> Streets. The Central Subarea Plan will also contribute to the development of alternatives on Aurora Avenue in this area.

**Response ID: 261      Cost of other projects**

***Responds to Comment: 63-63***

Environmental documents are not intended to focus on cost comparison issues. Cost, however, would likely be a factor in the City’s final decision for a preferred alternative for this project.

**Response ID: 262      ITAC membership**

***Responds to Comment: 63-64***

The Interagency Technical Advisory Committee (ITAC) was composed of staff from transportation agencies or neighboring jurisdictions. Agencies that participated include Community Transit (Jim Jessel and Todd Jacobs), Sound Transit (Barbara Gilliland and Don Billen), WSDOT – Office of Urban Mobility (Susie Serres, Seyed Safavian, and Mike Cummings), Snohomish County Public Works (Jack Bilsborough, Hans Kurz), Washington State Department of Transportation – Northwest Region (Dave McCormick), King County Department of Transportation-Metro Transit Speed & Reliability (Ellen Bevington), King County Department of Transportation (Don Ding, Mike Wong), King County Councilmember Maggi Fimia’s Office (Diane Yates), King County Legislative Branch (Steve Gorcester), City of Seattle SeaTrans (Chuck Morrison and Cynthia Robinson), Lynnwood Public Works (Larry Waters), City of Edmonds (Jim Walker), Department of Ecology – Water Quality NWRD (Ron Devitt and Rod Sakrison), Seattle City Light (Henry Brown,

Ingrid Baur, Jerry Swanson, and June Jacobson), Dept. of Fish/Wildlife (Doug Hennick), City of Shoreline – Transportation Planning (Kirk McKinley), PADS (Kathy Beals), City Engineer (Mike Gillespie), Engineering (Chuck Purnell), Planning/Urban Design (Paul Cohen). This group met periodically during the project to advise Shoreline staff and the consultant team on technical design issues. The ITAC reviewed and provided comments on design options and the development of alternatives.

**Response ID: 263      CPAC membership**

***Responds to Comments: 63-65, 64-59***

The City formed several Comprehensive Plan Advisory Committees (CPACs) during the development of the first Comprehensive Plan. A CPAC for Aurora Avenue was established to develop “subarea plan” alternatives for the Comprehensive Plan. Membership of this committee included: John Chang, Bill Davies, John Diaz, Marlin Gabbert, Tom Garren, Terry Green, Kevin Grossman, Naomi Hardy, Bill MacCully, Dave McCormick, Dan Mann, Bill Menard, Linda Minarcin, Bill Monroe, Bill Meyer, Chuck Olson, Craig Stone, Byron Vadset, Leon Zornes. Four members of this committee (Terry Green, Bill MacCully, Linda Minarcin, Chuck Olson) were also on the CATF. The CPAC did not reach a consolidated recommendation of the Aurora Corridor Subarea Plan. The City Council adopted various strategies and suggestions for the subarea process into the City’s Comprehensive Plan.

**Response ID: 264      Pedestrian use of crossings**

***Responds to Comment: 63-70***

By increasing the number of safer crossing opportunities, pedestrians would be able to use Aurora Avenue more safely. Without such crossings, pedestrians have no safe opportunities.

**Response ID: 265      Dual left-turn lanes at North 155th Street and North 160th Street**

***Responds to Comment: 63-71***

The description in the EA/DEIS says that these dual left-turn lanes “would be provided northbound at North 160th street and eastbound at North 155th Street.” Dual left-turn lanes do exist already on Aurora Avenue at North 155th Street.

**Response ID: 266      Right turns at North 165th Street**

***Responds to Comments 63-72***

The text in question in the EA/DEIS reads, “In addition, the lack of signalization at North 152nd and North 165th Streets would greatly impair access to Aurora Avenue North at these locations, even for right-turning vehicles.” There is no claim that right turns at North 165<sup>th</sup> Street are more dangerous than at any other residential street that abuts Aurora Avenue. It merely states that even vehicles turning right onto Aurora Avenue North at these locations would have poorer access without a signal present.

**Response ID: 267      LOS calculations**

***Responds to Comments: 63-74, 64-81***

Table 3-5 in the EA/DEIS refers to intersections and clearly indicates which intersections are signalized and which are not and which are included in the calculation of corridor average

(see Footnotes 1 and 2). If unsignalized intersections were included in the calculation, the average corridor intersection delay would be much worse for the “no action” alternative.

**Response ID: 268      Why is Parsonson research valid?**

**Responds to Comments: 63-77, 63-88**

The research cited can be the Parsonson research or one of many other research studies. Also, the Transportation Research Board (TRB) has now published the Access Management Manual which summarizes expected safety improvements due to access management treatments such as medians and right turn lanes. An extensive comparative evaluation of crash rates on roadways with two-way-left-turn lanes versus raised medians was conducted in NCHRP Report 420: Impacts of Access Management Techniques, TRB, 1999.

The NCHRP report found that the average crash rate on the roadways with a raised median is 30 percent less than those with a two-way-left-turn lane. None of the research over the past 20 years show that two-way-left-turn lanes for a roadway with six lanes, 40,000 vehicles per weekday, and 40 miles per hour speed limit would have lower accident rates than with access management treatments including a center raised median. Some of the research covers projects with longer distances between left/u-turn opportunities. When the distances between left/u-turn opportunities are longer, then the convenience for access to businesses is reduced while overall traffic safety is likely improved because the frequency of conflicting traffic movements is lower. However, the intent for all of the access management projects was the same that is to reduce the number of conflicting traffic movements and to focus conflicting/turning movements at fewer locations.

For the Aurora Avenue 145th to 165th project, business owners have been concerned that opportunities for left/u-turns be provided so that their customers can easily access their businesses. The increased frequency for left/u-turns in the two project alternatives has been included to respond to the concerns of business owners. Most of the left/u-turn movements for the three Aurora Avenue 145th to 165th project alternatives would occur at traffic signals and would have signal controlled protection. The more frequent the left/u-turn locations, the higher the potential for traffic conflicts and traffic accidents. However, note that recent research indicates that a right turn followed by a u-turn is safer than a direct left turn from a driveway (see: Lu, et. al., *Safety Evaluation of Right-Turns Followed by U-Turns as an Alternative to Direct Left Turns-Conflict Analysis*. Report for the Florida Department of Transportation, June 2001; and Zhou, et. al , *A Safety Comparison of Right-Turns Followed by U-Turns as an Alternative to Direct Left Turns from Driveways or Sidestreets*. Center for Urban Transportation Research, University of South Florida, June, 2001.) After implementation of the project, traffic safety would be monitored, and if a high number of accidents result from a left/u-turn location, that location may be eliminated by closing the median.

**Response ID: 269      Transit ridership**

**Responds to Comment: 63-81**

The text referred to in the comment states that “each bus trip could potentially mean that there would be 30 to 35 fewer vehicles on the road.” A bus at roughly 50 percent capacity holds 30 to 35 people. Assuming that each of these riders would be in a car, roughly 30 to 35 vehicles could be replaced with one bus trip. This is not intended to be a hard fact, but an example of how increased transit use can reduce congestion.

**Response ID: 270      Width for u-turns**

***Responds to Comment: 63-82***

The comment refers to a sentence on page 3-16 in the EA/DEIS, which says “The openings will be designed to accommodate a WB-55 design vehicle.” The sentence prior to that in the paragraph on page 3-16 says “These openings will make it possible for trucks and emergency vehicles to make *left turns* into properties along the corridor.” This sentence, and this portion of the document regarding truck and emergency vehicles access, does not claim that median openings or intersections would be designed to accommodate u-turns by WB-55 trucks. Median openings and intersections would be designed to accommodate left turns by large trucks, in accordance with the Roadway Design Manual (Exhibit 28).

**Response ID: 271      Transportation cumulative impacts**

***Responds to Comments: 63-83, 63-102***

Property access is affected by the design and spacing of driveways, the ease and safety of pulling off or onto a road, the distance from intersections, and traffic signal sequencing. Access safety improvements, including the median, would enhance access to properties by providing safer and easier access.

The existing roadways geometrics along Aurora Avenue, including limited capacity in intersections which cause congestion and unsafe traffic conditions due to lack of control of conflicting traffic movements, inhibit traffic access to businesses. The three build alternatives studied each add traffic capacity, and include access management features which would improve access to properties and businesses.

**Response ID: 272      Table 3-5**

***Responds to Comment: 63-86***

The Level of Service letter shown in Table 3-5 of the EA/DEIS for the intersection at North 165<sup>th</sup> in the EA/DEIS should be LOS “D”, not LOS “B”. The change was made in the SEPA Final EIS. The table in the FONSI shows LOS levels for the proposed project in Table 1.

**Response ID: 273      Existing crossings between North 160th and North 170th Streets**

***Responds to Comment: 63-91***

At the time this passage was written the Pedestrian Safety Demonstration Projects had not yet started construction. These enhancements do not include traffic signals, but consist of signs, striping, channelization, and other warning devices.

**Response ID: 274      Status of Aurora Avenue 165<sup>th</sup> to 205<sup>th</sup> project**

***Responds to Comment: 63-92***

There is not a contradiction between statements regarding the unknown funding availability for the Aurora Avenue 165<sup>th</sup> to 205<sup>th</sup> project and including that project in the cumulative impacts assessment. Both NEPA and SEPA require an assessment of cumulative impacts. Cumulative impact assessments identify the net incremental impact of a project and other reasonably foreseeable projects. The Aurora Avenue 165<sup>th</sup> to 205<sup>th</sup> project is a reasonably foreseeable project, which has been and continues to be included in the City of Shorelines’ capital improvement plan while the City seeks to secure adequate funding for its design and construction.

**Response ID: 275      Construction staging**

***Responds to Comment: 63-96***

Regarding the Construction Staging Plan, the first sentence of the 2nd paragraph states that construction detours for this project are not anticipated. The general conditions for evaluating detours are general guidelines. In the unlikely event that a temporary detour is needed, the City will present detour route options along with an evaluation of the routes at a public meeting with the City Council.

The City is proposing to fund and establish a traffic monitoring program that would monitor traffic before, during, and after construction on Aurora Avenue, intersecting streets, and parallel potential alternative routes. The City is also proposing to set aside funding to construct traffic calming devices should spillover traffic be demonstrated (threshold to be determined) on non-arterial streets after the project is completed. Detour routing (if necessary) would be established as part of the permitting process. It is the intent of the City to have four traffic lanes open and maintain access to all businesses during construction. The City would require the contractor to provide frequent updates on construction activities to the businesses along Aurora.

The City would mitigate construction impacts to businesses. Additional signage, public notice of business hours, and maintaining sufficient access to all businesses are all potential measures to mitigate construction impacts. Typical signs posted during construction would read “Businesses Open During Construction.” Construction documents would include contractor requirements to maintain signage for businesses.

Traffic would be able to use Aurora Avenue during construction, however it is likely that some traffic would use parallel north-south arterials. After construction, drivers are more likely to use the roadway that provides greater mobility – Aurora Avenue.

**Response ID: 276      Describe temporary signage**

***Responds to Comment: 63-97***

This type of detail is not typically provided in an EA. During construction, extra efforts such as posting “Businesses Open During Construction”, or other signs would be used to communicate to drivers and pedestrians that businesses are open and accessible. The City and contractor would coordinate with the business community on methods or efforts to advertise or communicate that business continues along the corridor.

**Response ID: 277      Housing versus regional growth**

***Responds to Comment: 63-99***

The “No Action” Alternative would have no impact on regional and community growth. This means that the pattern of overall growth in the City and region would not be affected.

The comment takes the statement about housing out of context. The EA/DEIS reads, “The character of the housing would experience deterioration and improvement of the stock normally associated with the life cycle of neighborhoods.” It does not mean that all housing in Shoreline would deteriorate. Like typical housing stocks, housing in Shoreline would continue to exist in various states of improvement, quality, and cost.

**Response ID: 278      Roadway water absorption*****Responds to Comment: 63-101***

Most roadways have cracks in the paved areas and along the shoulders, that may provide some catchment or infiltration during rain events. However, the subgrade is generally constructed with compacted material, and this material has been shown to be relatively impervious. In fact, the Department of Ecology now says that gravel roads should be treated like paved roads, and therefore no credit is given for infiltration.

The literature value for stormwater runoff coefficients from impervious surfaces (highways, local roads, sidewalks) is 0.9. This means that when rain falls on these impervious surfaces, 90 percent of the total runoff would reach the downstream conveyance system. This accounts for small areas of surface depressions, cracks, evaporation, etc. that are inherent in the nature of these surfaces. We are unaware of studies that show how older, "cracked" roadways have lower runoff coefficients than newer highways.

The City would model the roadway runoff from both existing impervious surfaces and new impervious surfaces using the literature values for highway runoff. Where there are existing pervious (grassy) surfaces, and future conditions call for paved surfaces, the City would calculate this "net increase" in impervious surface using the literature values.

**Response ID: 279      Vibration impacts*****Responds to Comment: 63-104***

Vibration caused by construction activities would only be of concern for certain specialized tasks such as driving steel piles for foundations or extensive use of tractor-mounted jack hammers for the demolition of reinforced concrete structures such as highway overpasses etc. None of these tasks are envisioned for the Aurora Corridor project. Typical highway widening or repaving projects do not generate much ground-borne vibration.

Operational vibration impacts were not examined because the standard guide on this issue ("Transit Noise and Vibration Impact Assessment" - FTA 1995) states "...it is unusual for buses to cause ground-borne noise or vibration problems... Most problems with bus-related vibration can be directly related to a pothole, bump or expansion joint. Smoothing the bump or filling the pothole would usually solve the problem" (page 7-9).

The BAT lanes of Aurora Avenue would be newly paved and would have none of the problems mentioned above. Consequently, there is no potential for the changes in Aurora Avenue to cause vibration impacts.

**Response ID: 280      Pedestrian/bike conflicts*****Responds to Comment: 63-107***

Under current conditions, pedestrians are forced to walk along the shoulder of the roadway with nothing separating them from traffic. This project has features that would provide a connected, continuous, safe, and pleasant environment for pedestrians. Only a small amount of additional right-of-way is necessary for these improvements. By professional judgment it has been determined that wider sidewalks would result in fewer pedestrian and bicycle conflicts. Wider sidewalks would give bicycles and pedestrians more space to maneuver around each other.

**Response ID: 281      Enhancing commercial development**

***Responds to Comment: 63-111***

The comment refers to two different subjects. The first is access. Some customers may access business on the same side of the street as they are traveling because they are easier to reach. Businesses on both sides of the street would be impacted positively and negatively by this.

The second topic is the enhancement of commercial development. By reducing congestion in the corridor, increasing capacity and safety for cars, buses, and pedestrians, and improving the visual appearance of the corridor, commercial redevelopment may be enhanced. This would be in accordance with the City's Comprehensive Plan.

**Response ID: 282      European Motors impact**

***Responds to Comment: 63-113***

Where portions of property are used for display purposes, businesses may be forced to reorient their inventory.

**Response ID: 283      Air quality construction mitigation monitoring**

***Responds to Comment: 63-115***

The contractor that the City selects to construct the Aurora Avenue 145th to 165th project would be responsible for complying with the air quality mitigation measures.

**Response ID: 284      Public comments**

***Responds to Comments: 63-117, 64g-2, 64m-2***

A substantial amount of public input has contributed to development of the alternative designs evaluated for this project. Please refer to EA/DEIS pages 1-5 through 1-7; Chapter 4 – Coordination and Comments (pages 4-1 through 4-9); and Appendix B – Relationship to Plans and Projects (pages B-1 through B-7).

All input from the public and agencies was considered but not all was accepted. Because public and agency input originated from a broad spectrum of participants, some input conflicted with other input, some was beyond the scope of the project, and some had direct application.

**Response ID: 285      Korean newsletters**

***Responds to Comment: 63-118***

The translated newsletters were initially provided to property and business owners within the project limits in October, 2000 prior to conducting meetings with property and business owners for this project.

**Response ID: 286      Amenity zone maintenance**

***Responds to Comment: 63-119***

It is the City's intent that the landscaping elements of this project be supportive of and help to improve the appearance of the corridor. The City would maintain the median landscaping. The City may require that landscaping in the amenity zone be maintained by business or property owner. The City would prune street trees.

**Response ID: 287      Fertilizer impacts**

***Responds to Comment: 63-120***

Drainage from landscaped areas that are fertilized is required to be routed through the stormwater treatment systems according to SWDM. This would occur as part of the project design.

**Response ID: 288      Erosion control plan**

***Responds to Comment: 63-121***

Temporary erosion control best management practices (BMPs) would include the use of construction-related BMPs like silt fences, erosion control blankets, storm drain protection inserts, temporary seeding of sideslopes, vegetation protection, and using new technologies in removing turbidity from stormwater, such as electrocoagulation and filtration.

**Response ID: 289      GMA questions for City**

***Responds to Comment: 63-124***

The EA/DEIS details the amount of property to be acquired with Alternatives A and B (impacts from Alternative A Modified are described in the FONSI). Under Alternative A, approximately 0.79 acres would be purchased, under Alternative A Modified 0.65 acres would be purchased, and under Alternative B approximately 0.47 acres would be purchased. This has been judged to be a minor amount of land that is limited to narrow strips adjacent to the public right-of-way.

GMA includes a number of competing goals that the City must balance. Private property right are protected by the government by paying full and fair market value for any property that is taken by the government for public use. As described in the EA/DEIS, the proposed project will compensate property owners for the fair market value of their property in accordance with the *Aurora Avenue North Right-of-Way Policies and Procedures Manual* and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

**Response ID: 290      Reducing capacity**

***Responds to Comment: T-16***

The Aurora Avenue 145th to 165th project improvements are a critical investment to expand the multimodal capacity of this vital transportation corridor. The community has participated actively in creating comprehensive, balanced solutions as defined by the build alternatives. Most of the transportation grants have been provided to the City for the Aurora Avenue 145th to 165th project because it adds traffic capacity, transit speed and reliability improvements, traffic and pedestrian safety improvements, and pedestrian access improvements, all in one project. Transit currently moves 10 to 15 percent of travel on Aurora Avenue in the peak hour/peak direction.

This project would enable and promote transit and pedestrian access so that substantially greater people movement capacity can be made available as the region becomes more congested. This potential for higher capacity travel is provided without converting Aurora into a freeway-type facility that would require a much larger extent of right-of-way and would impact businesses to a greater extent.



**Response ID: 291      Level of environmental impact**

***Responds to Comment: 64-6***

The EA/DEIS and FONSI discuss several impacts of the project on a wide variety of environmental elements and makes no claim that there are absolutely no impacts. The impacts identified in the environmental document are not judged to be substantial, and can be mitigated. The FONSI is a formal declaration that none of the impacts are “significant” – that is, a reasonable likelihood of more than a moderate adverse amount, depending on the physical setting, and magnitude and duration of impact.

**Response ID: 292      Aurora Avenue and Interurban Trail projects**

***Responds to Comment: 64-19***

The Interurban Trail is intended to provide regional mobility for bicycles and pedestrians and not necessarily to access businesses along Aurora Avenue North. The Interurban Trail runs diagonal to Aurora and is more than 650’ away at 145th Street. The Interurban Trail would not address the purpose and need of the Aurora Avenue North 145th to 165th project and therefore it is not a component of this project.

The Interurban Trail would be constructed mainly on existing impervious surfaces and therefore would not add run-off to local streams.

Discussion of the Interurban Trail is included by an overview of transportation projects in the Aurora Avenue 145th to 165th vicinity.

**Response ID: 293      Pedestrian undercrossings and overpasses**

***Responds to Comments: 64-23, 64h-3, A-5-1***

Grade-separated pedestrian crossings were eliminated from consideration as part of the corridor design based on a combination of cost, right-of-way impacts, impacts to business access, and pedestrian security and comfort.

Pedestrian overpasses were estimated to add \$800,000 to \$1,500,000 per crossing to the project cost compared to at-grade crossings at traffic signals which cost about \$150,000 per intersection.

The Americans with Disabilities Act (ADA) requires that a maximum 8.33 (1:12 slope) percent grade be provided for any pedestrian facility. Access ramp lengths would exceed 200 feet. The long ramps required would increase right-of-way requirements potentially eliminating parking and could block access to businesses. Undercrossings would also create similar problems with additional concerns for pedestrian security and comfort which is an issue for users of the confined underground passage. Undercrossings also have high design costs.

**Response ID: 294      “Smart stud” crossings**

***Responds to Comments: 64-24, 64-68***

In-pavement lighting systems such as “smart stud” were studied and may be incorporated into pedestrian crossings as part of the final design for the Proposed Action.

**Response ID: 295      BAT as an acronym for “Bicycle and Transit”**

***Responds to Comment: 64-25***

The EA/DEIS clearly identifies the abbreviation for Business Access and Transit lanes as BAT. The abbreviation is used to avoid the need to include the four words. There are no other locations in the document where this abbreviation is used for a different meaning. This term was used to simplify the description of lanes that serve as auxiliary lanes for right turning vehicles at driveways and side streets and for through movement by transit vehicles.

**Response ID: 296      Bicycles on Aurora Avenue**

***Responds to Comment: 64-26***

Bicycling and walking are modes of transportation and forms of exercise and recreation. As there are types of bicyclists (commuter/utility, recreation/fitness) with varying skill levels, some may be comfortable with sharing right-of-way with motor vehicles and others may not. Providing sidewalks wider than the practical minimum required by the Americans with Disabilities Act (ADA) would allow bicyclists, particularly those engaged in exercise or recreation to share the sidewalk with pedestrians by providing room to pass with adequate clearance.

Adding bicycle lanes to Aurora Avenue would add 8 to 10 feet to the roadway cross section and require additional right-of-way acquisition and resulting impacts on businesses. Commuting bicyclists would be able to use the Interurban Trail and are also allowed on city sidewalks. Bicycles would more likely reach commuter speeds on the Interurban Trail, which is intended for commuting trips. Bicycles would travel more slowly on Aurora sidewalks because of space constraints and the presence of driveways and automobiles. At slower speeds, bicycles would be less of a hazard to pedestrians.

We acknowledge that the commuting bicycles would also probably use the BAT lane.

**Response ID: 297      NAAQS violation**

***Responds to Comment: 64-29***

The conformity regulation requires that a project not cause a new, or worsen an existing, violation of the CO standard. The conclusion of the FONSI is that the modeling demonstrates that the project meets this requirement, in the case of North 145<sup>th</sup> Street, by showing modeled concentrations for the build alternatives that are no worse than the “no-action” alternative. Although these modeled concentrations are above the NAAQS, the modeling technique used is a conservative tool which allows for the comparison of alternatives to indicate relative impacts. Therefore, it is not a true indication of whether there is an existing violation of the standard at that intersection, but rather an indication that the project would not worsen (cause higher concentrations) what would be there without the project being built.

**Response ID: 298      Air quality violations from new signals**

***Responds to Comment: 64-31***

No, the presence of a new signal does not automatically create an air quality violation. The modeled traffic volumes and levels of service at intersections with new signals would not be great enough to create new air quality violations.

**Response ID: 299      Carbon monoxide and noise**

***Responds to Comment: 64-32***

There is no direct correlation between levels of carbon monoxide and levels of noise. Additionally, the noise analysis in Attachment 3 of the FONSI has shown that noise conditions in the year 2020 would not be greater with the project compared to the “No Action” Alternative. This was also true for Alternatives A and B as analyzed in the EA/DEIS.

**Response ID: 300      Noise results**

***Responds to Comment: 64-33***

The noise model has accounted for new traffic signals and anticipated volumes of traffic. There are many variables that affect increases and decreases in noise levels. The presence of a signal at North 165<sup>th</sup> Street would cause some cars to stop southbound for a red light, but will also improve traffic flow through the corridor. The predicted exterior noise levels for 2020 do not exceed future No Action Alternative levels, and the interior noise levels do not exceed the Interior FHWA noise criteria.

**Response ID: 301      Visual quality of street signs**

***Responds to Comment: 64-39***

Both street signs and business signs can create a low-quality visual environment. Taken singly these signs may not be considered unpleasing but taken as a group they can produce visual clutter, especially if there are many signs at very different heights and locations relative to the street edge. Private side signs are governed by Shoreline Municipal Code (SMC) 20.50.530-20.50.610.

**Response ID: 302      Aurora Avenue 165th to 205th funding**

***Responds to Comment: 64-43***

The City would likely have some funds remaining from previously awarded grants that can be used for other projects on other portions of Aurora Avenue. Funding opportunities may be available in the future for additional improvements on other portions of Aurora Avenue.

**Response ID: 303      Cost of projects in Lynnwood and Edmonds**

***Responds to Comment: 61-56, 64-45***

The costs of improvements to State Route 99 in Lynnwood and Edmonds differ with the estimated costs for the proposed project for a number of reasons. Each project has a different set of objectives and local conditions. These objectives and conditions require different project features. These features and their benefit to the community and the facility have an effect on project costs.

The primary difference between the two projects is their project elements and benefits, which are the result of the different projects’ purposes and new regulations since completion of the Edmonds/Lynnwood/Snohomish County SR 99 Project (Edmonds/Lynnwood project). The Edmonds/Lynnwood project has seven lanes, including outside lanes in each direction for transit and right turns, two through lanes in each direction, and a center two-way, left-turn lane. Instead of a two-way, left-turn lane, the Aurora 145-165 project would have a raised median with left-/u-turn pockets. The

Edmonds/Lynnwood project does not have the intersection capacity improvements that the Aurora Avenue 145-165 project does. Sidewalks with a 7.5-foot width have been included as part of the Edmonds/Lynnwood project but new pedestrian crossings have not. The Aurora 145-165 project includes pedestrian crossings, pedestrian-scale lighting, and other amenities, such as landscaping, not included in the Edmonds/Lynnwood project. The Aurora Avenue 145-165 project would also have the following features, which are not a part of the Edmonds/Lynnwood project: overhead utilities relocated underground and stormwater drainage system improvements (a new collection and conveyance system, improved water quality facilities to treat the roadway stormwater collected, oil-water separators located at high volume intersections, and stormwater detention for Aurora Avenue runoff). The topography of the Aurora 145-165 project also requires retaining walls.

Another major distinction between the Edmonds/Lynnwood project and the Aurora 145-165 project is their construction dates. There is varying degrees of uncertainty, or risk, associated with different levels of project definition, making it difficult to compare project costs at dissimilar stages of development. The Edmonds/Lynnwood project was completed in 1999, while the Aurora 145-165 project is at 30-percent design level. As a result the estimated costs for the Aurora 145-165 project include contingencies for uncertainties that may not materialize and as result may not lead to corresponding expenditures. Inflation has also affected project costs.

**Response ID: 304      Job growth**

***Responds to Comment: 64-47***

The City's Comprehensive Plan has assumed the creation of thousands of new jobs within the City of Shoreline. Part of the job creation must come from creating a stronger business district along Aurora Avenue, again, as directed by the Comprehensive Plan. The Aurora Avenue 145th to 165th project is one of the projects that the City feels would support the vision and goals set forth in the plan. Without this project, realization of City goals including job creation, may not be fully realized.

**Response ID: 305      P.M. peak period**

***Responds to Comment: 64-53***

The P.M. peak period is from 4 p.m. to 5 p.m.

**Response ID: 306      Signal timing**

***Responds to Comments: 64-56, 64-83***

Traffic signal progression can be timed for both directions of Aurora Avenue as well as for arterial system intersections on Aurora Avenue such as North 145th Street or North 205th Street. *Optimized* progression can be provided either for one direction or both or for a broader system, depending on how it is defined.

**Response ID: 307      Freight traffic on Westminster Way**

***Responds to Comments: 64-57, 64-58, 64-88***

This project does not include closure of the Westminster Way connection from Aurora Avenue to 155th Street and Westminster Way. Westminster Way is designated freight route, and the Pre-Design Study recommended constructing an additional right-turn lane at North 155th Street to accommodate trucks turning from Aurora Ave to Westminster Way. The

Aurora Avenue 145th to 165th project is planning to keep Westminster Way open at this time. The southbound connection from Aurora Avenue to Westminster Way is proposed to be reconfigured to allow one lane to turn from Aurora Avenue onto Westminster Way. The radius of this turn will be tighter than the existing turn radius. However, this turn will still be designed to handle large trucks (WB-67). By designing this connection as one lane with a tighter radius, the roadway opening across Westminster Way will become smaller to improve safety and to create a manageable pedestrian crossing at Westminster Way and Aurora Avenue on the west side of the street. The City may at some future time pursue closing this portion of Westminster to some or all traffic. Appropriate public review will be conducted at that time, and future designs will consider freight traffic accommodation.

**Response ID: 308      Study area limits**

***Responds to Comment: 64-61***

The dimensions listed on the first page of Chapter 2 in the EA/DEIS indicate the length of the actual improvements that are expected as a part of this project (includes all lane alignment and tapering). Please note that the next paragraph on that page in Chapter 2 explains that the actual study area for each environmental discipline varies from the literal dimensions of the project.

**Response ID: 309      CATF and ITAC involvement**

***Responds to Comment: 64-66***

Please refer to the “Aurora Corridor Multimodal Pre-Design Study” report for a full description of the process used to develop study alternatives. A series of 13 working meetings with the CATF and six meetings with the ITAC were conducted to identify issues, review options, identify strategies, refine strategies, participate in a design charrette, review schematic drawings, review preliminary layouts, refine layouts, confirm alternatives concept drawings, evaluate alternative concepts, provide guidelines for further refinement and development of the recommended concept with 32 points. Through this process, the CATF and ITAC actively “helped to develop” alternatives.

**Response ID: 310      Pre-design analysis**

***Responds to Comment: 64-67***

Comment 64-67 refers to a section in the EA/DEIS entitled “Alternatives from Pre-Design Screening,” which includes a summary of work and findings from a previous study of Pre-design alternatives in 1999. Analysis of the Pre-design alternatives is contained in the document titled “Aurora Corridor Multimodal Pre-Design Study.” Additional information supporting the findings of that 1999 study is included in the study’s Technical Appendices.

Regarding comments on the findings relating to transit operations, that Pre-design Study conducted traffic and transit operations analyses using the simulation software VISSIM. VISSIM is currently the best tool for evaluation of transit operations performance within a highway system. VISSIM is a microsimulation program that can be used to analyze traffic operations of different vehicle types and to simulate conditions such as transit priority treatments, bus pullouts, in-line stops, affect of general traffic congestion, actual bus schedules, and boarding/deboarding at bus stops. VISSIM is used by transit operators, including King County Metro Transit, to evaluate transit speed and reliability improvements. The Aurora Corridor Multimodal Pre-Design Study showed improved

average transit travel times and reduced variability in transit travel times partially due to in-lane transit stops versus bus pullouts.

Regarding comments on pedestrian safety for the alternatives evaluated in that study, grade-separated pedestrian crossings were included for consideration in the Pre-design Study. They were found to be safe, although they also included major disadvantages. Disadvantages included the high cost of grade-separated crossings, as much as \$1 million each. Underground crossings have security problems for users, causing many existing crossings in urban areas to be closed and abandoned. Both types of grade-separated crossings require lengthy ramps to comply with ADA requirements, and those ramps would potentially block visibility and access to properties, and require right-of-way. Because of the difficulty for access up to and down from the crossings, concern was identified that pedestrians often avoid using them. It should be noted that the Pre-design Study did consider that a grade separated crossing would be included for the Interurban Trail crossing of Aurora in the vicinity of North 155th Street.

**Response ID: 311      Traffic volumes for accident rates**

***Responds to Comment: 64-71***

Accident rates are calculated using average annual daily traffic data. These are annualized in order to compare with annual accident statistics and to calculate a yearly accident rate expressed in accidents per million vehicle miles. Using average annual traffic volumes to prepare accident rate calculations is the normal procedures for such calculations.

Consideration of the need for raised medians is based upon many factors, one being the traffic volume. However, other factors include driveway density, number of lanes, traffic speed, and accident history. The threshold at which two-way-left-turn lanes begin to experience accident problems is daily traffic volumes ranging from 24,000 to 28,000 trips per day (see for example, Parsonson, P. S., Development and Guidelines Governing Median Selection. Final Repot. D.O.T. Guinnett County. Ga. February, 1990). Regardless of whether average annual daily traffic numbers or average weekday traffic numbers are used, or all traffic numbers for Aurora Avenue are for existing conditions or 20 years in the future, the numbers are substantially higher (AADT 35,200 in 2001 and 40,000 and greater by 2020) than threshold levels that have been established for raised medians.

**Response ID: 312      Inclusion of Comprehensive Plan goals**

***Responds to Comment: 64-73***

The City's Comprehensive Plan Goals are stated to demonstrate the need for the project as defined in existing legislative documents.

**Response ID: 313      Parallel facilities**

***Responds to Comment: 64-74***

Parallel facilities that are bike facilities on roads such as bike lanes would not be used by pedestrians.

The street system throughout the City of Shoreline is available for bicycle use. The Capital Improvement Program includes investments to add bike lanes and other features to support bicycle travel. The Interurban Trail project would be developed to accommodate bicycle travel. Bicyclists may use the outside lanes of the Aurora project as described in the

alternatives and also the sidewalks. Throughout the consideration of the options and alternatives for the Aurora corridor, the City, other agencies, the CATF, and the general public considered all possible facilities and components for inclusion within the alternatives. Adding formal bike lanes would increase the width of the cross-section for each alternative by 8-to-10 feet. This additional width would increase the construction and right-of-way acquisition costs, increase environmental impacts, and cause significant impacts on property/business owners.

**Response ID: 314      Relocation analysis**

***Responds to Comment: 64-76***

The Aurora Avenue 145th to 165th project would not displace any buildings. The economic analysis has determined that there would be offsetting impacts to businesses due to the project. Therefore, no relocation analysis has been performed.

**Response ID: 315      North City traffic improvements**

***Responds to Comment: 64-79***

The North City traffic improvements were coded into the City of Shoreline's EMME/2 travel demand model that was used to develop forecasts used in traffic impact analysis.

Traffic impacts due to the 15<sup>th</sup> Avenue NE traffic improvements are analyzed and reported in the North City Subarea EIS.

**Response ID: 316      Alternatives within the existing right-of-way**

***Responds to Comment: 64-80***

NEPA and SEPA require that a range of reasonable alternatives be examined, but not that all alternatives be examined. The City has included three build alternatives that it believes represent the range of reasonable designs that would still meet the project's stated purpose and need.

The right-of-way width in the project limits ranges from 90 feet to 115 feet.

**Response ID: 317      Left-turns restriction at North 165th Street**

***Responds to Comment: 64-82***

The design for the intersection at North 165<sup>th</sup> Street has been developed to enable safe left turn access into and out of the adjacent neighborhoods, and also to enable u-turns on Aurora Avenue. The signalization of this intersection would also allow for controlled pedestrian crossings. Restricting left turns from North 165<sup>th</sup> Street would improve the level of service of the intersection. Denying left turn access out of the neighborhoods would require traffic from adjacent neighborhoods to travel out of their way to reach a signal for left-turn access to Aurora Avenue.

**Response ID: 318      Open house comment sheets and city council meeting minutes**

***Responds to Comment: 64-91***

Open house comment sheets and city council meeting minutes are not typically included in an EA or EIS. Even though open house comment sheets and city council meetings minutes have not been included in the EA/DEIS, they were used by the project team during development of the project alternatives and preparation of the EA/DEIS.

**Response ID: 319      Neighborhood concerns at May 23, 2002 meeting**

***Responds to Comment: 64-92***

These statements were not intentionally omitted from the EA/DEIS. The City is aware of the concern for neighborhood safety as discussed in the May 23, 2002 meeting and other public meetings. In response, the City proposes immediate and continuous implementation of its Neighborhood Traffic Safety Program for neighborhood streets adjacent to Aurora Avenue. The City would be conducting traffic counts and traffic speed measurements for all adjacent streets. During construction and in future years after the project is completed, the City would monitor traffic conditions on neighborhood streets. If traffic conditions on neighborhood streets warrant action, the City would work with neighborhoods to implement neighborhood traffic and control measures.

**Response ID: 320      Environmental elements studied**

***Responds to Comment: 64c-2***

All of the topics mentioned in the comment are covered in the EA/DEIS and FONSI except for those dealing with cost. Environmental documents do not provide analyses of costs; however, note that the current projected cost of the Proposed Action is \$19.6 million.

Table 1 in the FONSI shows levels of service for project intersections resulting from traffic flows with the Proposed Action. Each intersection has fewer seconds of waiting time except for at North 145<sup>th</sup> Street, which is 8 seconds longer. Pedestrian safety will increase due to the presence of continuous sidewalks and additional signalized crossing points (at North 152<sup>nd</sup> and North 165<sup>th</sup> Streets). Neighborhood streets will be slightly safer because of modest traffic diversions onto Aurora Avenue. The City will also continue its Neighborhood Traffic Safety Program. There would be no impacts to sensitive areas and fish habitat would improve because stormwater facilities would result in cleaner stormwater runoff. The Proposed Action would not create a new CO violation of the NAAQS nor would it worsen an existing violation (see Tables 7 and 8 in the FONSI). Pedestrian lighting along sidewalks would be low in height and shielded to avoid glare. No impacts to sewers are expected; however underground sewer pipes would need to be accommodated during construction. Impacts to businesses such as reduced direct access are anticipated to be offset by increases in mobility and exposure to a larger customer base, and improvements to traffic and pedestrian safety and to the roadway and road edge appearance.

**Response ID: 321      Fences along median**

***Responds to Comment: 63-118A***

WSDOT and the City of Shoreline will not erect fences along the raised median.

**Response ID: 322      Stream degradation**

***Responds to Comments: 64t-2, 64t-3***

Please see Response ID 321.

**Response ID: 323      Stream sampling**

***Responds to Comment: 64t-4***

Stormwater within the project area is presently untreated prior to discharge to the downstream receiving waters. The proposed project would provide stormwater treatment



facilities to treat stormwater runoff from pollutant-generating impervious surfaces. As a result, stormwater discharged from the project would have improved water quality. Stream samples were not collected because the project would improve water quality by treating currently untreated stormwater runoff.

**Response ID: 324      Stormwater design**

***Responds to Comment: 64t-5***

The City of Shoreline has adopted the *King County Surface Water Design Manual* (SWDM) for development and review of all drainage projects. In addition, the City has indicated that the criteria in the Washington State Department of Ecology's 2002 *Stormwater Management Manual for Western Washington* (SMMWW) should also be used in selecting the stormwater flow control and quality treatment measures for the proposed project. The more conservative criteria from the two manuals (SWDM and SMMWW) are to be used. Under either manual, the project meets the description of a roadway redevelopment project.

Using the more conservative criteria from both manuals, flow control of stormwater runoff will be required for only the net new impervious surfaces created under the proposed project in the Boeing Creek and Thornton Creek Basins. It is expected the constructed detention system will likely include a series of underground vaults to detain the stormwater flows. Detention facilities are required to be designed based on a continuous hydrologic simulation model, i.e. a computer model that estimates stormwater runoff flows from rainfall occurring across many years and not for just a single design storm. Both manuals agree on the design standard for the flows released from the detention facilities: durations of the flows released from the facility should not exceed the durations estimated for stormwater flows from the same area under predeveloped conditions for the range of flows from 50 percent of the 2-year peak flow up to the full 50-year peak flow. The predeveloped conditions will be forested land cover (a requirement of the SMMWW) for the area where there is a newly created in impervious surfaces. For instance, Alternative A shows a net increase of approximately 14,000 square feet of impervious surfaces. To determine the required detention volumes for this area, a continuous simulation model would be used to predict stormwater runoff from the area using forested land cover as the pre-existing conditions, and impervious surfaces as the post-project conditions. Then, the model would route the series of storms through a detention facility to obtain the required release rates, and the facility would be designed accordingly.

Additional information regarding stormwater treatment is provided under Response ID 45.

**Response ID: 325      Please show stormwater facilities on a map**

***Responds to Comment: 64t-8***

The schematic drawings showing pre-planning level locations of the storm sewers and management facilities are available from the City. These are subject to change based on the final detailed design of the Proposed Action.

**Response ID: 326      Narrower street**

***Responds to Comment: 64I-2***

None of the alternatives featured in the EA/DEIS would make the street narrower. The build alternatives considered in the EA/DEIS, as well as the Proposed Action discussed in the FONSI, propose adding both a southbound and northbound BAT lane.

**Response ID: 327      U-turn prohibition**

***Responds to Comment: 64I-3***

U-turns would be provided for in all of the “build” alternatives at non-signalized u-turn pockets in the median as well as at signalized intersections.

**Response ID: 328      Pedestrians in the median**

***Responds to Comment: 64I-5***

Current WSDOT design guidelines do not allow trees to be planted in the median without deflective designs to protect drivers. The guidelines allow only low-lying ground cover and grass. This would keep any pedestrians in the median area visible to passing cars. If the City Council decide to plant trees in the median, the selection of type would consider pedestrian visibility and visibility across the street.

**Response ID: 329      “Alternative C” analysis**

***Responds to Comment: 27-14***

The WSDOT responded to the requests of the Shoreline Merchants Association from the June 26, 2002 meeting (as well as the September 18, 2002 meeting) in a letter dated October 8, 2002.

**Response ID: 330      Support of project in general**

***Responds to Comment: A-4-1***

Your support of the Aurora Corridor Project 145-165 is acknowledged.

The Proposed Action is a modification of Alternative A, which was featured in the EA/DEIS. It proposes construction of continuous 7-foot wide sidewalks with an adjacent 4-foot wide amenity zone and 6-inch curb that extends the length of the project area, and seven lanes of traffic (two general-purpose lanes and one continuous Business Access/Transit [BAT] lane northbound and southbound, and one center lane for left/u-turn pockets/median). See the description and figures in the FONSI. This action would satisfy many objectives beyond moving automobiles, including improving traffic safety, lighting, transit mobility, improving the visual image along Aurora Avenue and encouraging economic redevelopment. The Proposed Action would have no significant impacts.

**Response ID: 331      Support of Modified Alternative A**

***Responds to Comment: A-9-1***

Your support of Modified Alternative A is acknowledged. This is the Proposed Action.

**Response ID: 332      “T-35 with Response #64 Alternative C”**

***Responds to Comment: A-15-1***

WSDOT and the City of Shoreline have determined that the concept called Alternative C (as defined by the SMA and by others) is not a reasonable alternative to accomplish the purpose and need for this project as it does not contain adequate safety measures and, therefore would have a deficient geometric roadway design that WSDOT has said they would not approve. Many of the elements of your proposed solution (as defined in Shoreline Merchants Association literature), such as the business access and transit lanes, are actually included within the project alternatives. A point of clarification, Alternative A Modified is not a new alternative, instead it is a slight modification to Alternative A in response to public concerns and to reduce environmental impacts.

**Response ID: 333      “Response ID #50, Required Medians”**

***Responds to Comment: A-15-2***

WSDOT’s position regarding the need for traffic safety designs, such as a raised median, for this project is not based solely upon only WAC-468. Other highway and safety design considerations also apply, such as accident history, number of lanes, traffic volumes, driveway density and traffic speeds. WSDOT has testified at city meetings many times over the past 5 years, that raised medians would be required.

**Response ID: 334      Application of other safety solutions**

***Responds to Comment: A-15-3***

Regarding comment on application of other limited safety solutions, it should be noted that this project is not only to resolve recent past accident problems. In addition to addressing those problems, the design also must provide safe roadway channelization to support traffic growth over the next 20 years and beyond. The project alternatives also must address, in a comprehensive way, all aspects of the purpose and need and other objectives identified by the City Council and the CATF over the course of the concept development process.

**Response ID: 335      Added left turn locations**

***Responds to Comment: A-15-4***

Regarding comment that the project alternatives would have “many new added left-turn lanes in the area of 145th-to-155th, unsignalized,” the number of unsignalized left-turn locations between these two locations would only be four. With a 2-way left-turn lane, there would be potentially 50 locations. The high number of unchannelized and uncontrolled left-turn locations for the 2-way left-turn lane is the reason that type of design is not safe for this type of roadway application.

**Response ID: 336      City of Seattle Accident History on Aurora**

***Responds to Comment: A-15-5***

Regarding reference to the accident history for City of Seattle on Aurora, this is very relevant given that the conditions are nearly identical to Shoreline. That location is just immediately south of Shoreline, with similar traffic volumes, same number of lanes, etc.

**Response ID: 337      “Response ID #49, Increased Capacity with the Signal”**

***Responds to Comment: A-15-6***

A detailed computer traffic simulation has been conducted for the project using CORSIM. This model takes into account the spacing of signalized intersections, signal timing and phasing, and turning movement volumes at each intersection. The traffic operation’s results shown in the EA/DEIS and FONSI are based upon consideration of coordinated operation of all the signals.

**Response ID: 338      “Response ID #47, How is Capacity Improved”**

***Responds to Comment: A-15-7***

This comments states that adding right turn lanes at the five signalized intersections along the project length, would provide the same capacity benefit provided at intersections as the BAT lanes would provide. This is generally true. However, the BAT lanes provide additional benefits beyond the capacity for traffic which these lanes will provide at intersections. The continuous BAT lanes also serve as an auxiliary lane for traffic access to properties and businesses along Aurora. The BAT lanes also enable buses to stop at bus stops in lane, without to requirement to leave the roadway (this corrects the statement made in the comment that said that buses would need to stop in a pull-off lane). The BAT lane would be continuous, and buses would travel the length of the corridor in that lane. King County Metro Transit is highly supportive of the design for Aurora project, and the inclusion of BAT lanes to support transit speed and reliability improvement. As expressed in Comment letter 57, and Comment 57-1, Rick Walsh, General Manager of Metro said : “Metro specifically expresses its support for the following elements of the proposed project: Continuous 24-hour business access and transit lanes, consistent with the proposed cross sections in the environmental document.” For more discussion regarding the BAT lanes and their associated operations and benefits, refer to the description of the Business Access and Transit Lane in Chapter 2 – Project Alternatives, and Chapter 3 – Transportation, as well as Response ID: 2, 9, 30, and 37.

**Response ID: 339      Signal at 165<sup>th</sup> Street**

***Responds to Comment: A-15-8***

The “roving eyes” installation is a temporary demonstration. The justification for a signal at 165th has been presented in the responses to comments as: to enable safe access onto Aurora from adjacent neighborhoods; to allow safe pedestrian crossings; to allow protected left and U-turns for access to businesses along Aurora.

**Response ID: 340      Metro plans for transit service on Aurora**

***Responds to Comment: A-15-9***

Metro’s 6-Year Plan includes the intent to develop Aurora as a Bus Rapid Transit (BRT) corridor. See discussion in the EA/DEIS page xviii – Description of Other Major Actions and in Appendix B – Relationship to Plans and Projects. The Route 358 was consolidated into one route from the prior multiple routes in the corridor as one of the actions to implement BRT. The Route 358 has headways of as low as 5 minutes in the peak period.

**Response ID: 341      Transit Signal Priorities**

***Responds to Comment: A-15-10***

Transit signal priority (TSP) has only been applied in test (for evaluation) applications along Aurora. The Shoreline Aurora project must design and install the permanent TSP equipment in order to realize the benefits of TSP for transit speed and reliability improvement.

**Response ID: 342      “Response ID #51, Include Two-Way Left-Turn Lane”**

***Responds to Comment: A-15-11***

This is adequately addressed in Response ID #51. The project is being developed as a 20-year solution, not as a short-term stop-gap.

**Response ID: 343      “Response ID #52, The CATF Recommendation Included Reduction of the Speed Limit to 35 MPH”**

***Responds to Comment: A-15-12***

WSDOT will not allow reduction of the speed limit to 35 MPH until an off-peak (free flow) speed study indicates 85-percentile speeds of 35 MPH. The City and WSDOT intend to conduct speed studies in the future in an effort to reduce the speed limit. See Response ID 86 for more discussion of lowering the speed limit.

**Response ID: 344      “Response ID #56, Left-Turn versus U-Turn Safety”**

***Responds to Comment: A-15-13***

An extensive comparative evaluation of crash rates on roadways with two-way-left-turn lanes versus raised medians was conducted in NCHRP Report 420: Impacts of Access Management Techniques, TRB, 1999. That evaluation found that the average crash rate on the roadways with a raised median is 30 % less than those with a two-way-left-turn lane. None of the research over the past 20 years show that two-way-left-turn lanes for a roadway with six lanes, 40,000 vehicles per weekday, and 40 miles per hour speed limit would have lower accident rates than with access management treatments including a center raised median. Some of the research covers projects with longer distances between left/u-turn opportunities. When the distances between left/u-turn opportunities are longer, then the convenience for access to businesses is reduced while overall traffic safety is likely improved because the frequency of conflicting traffic movements is lower. However, the intent for all of the access management projects was the same, that is to reduce the number of conflicting traffic movements and to focus conflicting/turning movements at fewer locations. For the Aurora Avenue 145th to 165th project, business owners have been concerned that opportunities for left/u-turns be provided so that their customers can easily access their businesses. The increased frequency for left/u-turns in the two project alternatives has been included to respond to the concerns of business owners. Most of the left/u-turn movements for the three Aurora Avenue 145th to 165th project alternatives would occur at traffic signals and would have signal controlled protection. The more frequent the left/u-turn locations, the higher the potential for traffic conflicts and traffic accidents. However, note that recent research indicates that a right turn followed by a u-turn is safer than a direct left turn from a driveway (see: Lu, et. al., *Safety Evaluation of Right-Turns Followed by U-Turns as an Alternative to Direct Left Turns-Conflict Analysis*. Report for the Florida Department of Transportation, June 2001; and Zhou, et. al, *A Safety Comparison of Right-Turns Followed by U-Turns as an Alternative to Direct Left Turns from Driveways or*

*Sidestreets*. Center for Urban Transportation Research, University of south Florida, June, 2001.)

**Response ID: 345      “Response ID #59, U-Turns for Trucks”**

***Responds to Comment: A-15-14***

Truck loadings and unloadings from the 2-way left-turn lane is not a safe, nor an acceptable practice. See Chapter 3 – Transportation for discussion on truck access from the regional highway system.

**Response ID: 346      “Response ID #60, Emergency Vehicles”**

***Responds to Comment: A-15-15***

The police and fire departments have reviewed the plans and have commented that response times will not be significantly affected.

**Response ID: 347      “Response ID #64, Alternative C”**

***Responds to Comment: A-15-16***

The consideration and rejection of Alternative C is adequately addressed above in numerous responses including ID #64, as well as in the EA/DEIS. The traffic modeling did include east/west, north/south, left-turn, and u-turn movements. Detailed capacity calculations were not included in the discipline reports or EA/DEIS, but can be viewed as a part of the official project file.

**Response ID: 348      “Response ID #69, Left-Turns in the Median”**

***Responds to Comment: A-15-17***

See discussion in Response ID #50. A 2-way left-turn lane allows nearly unlimited left-turn conflicts including turns from Aurora into driveways and also left turns from driveways onto Aurora. The project alternatives allow only a few controlled turns from Aurora into driveways, and no left turns from driveways onto Aurora. Comparison of a two-way-left-turn lane design versus the project alternatives which include raised medians and channelization are not “the exact same conflict of turning traffic” because a continuous two-way-left-turn lane provides no control of the quantity or location of the turning conflicts along the roadway. The preliminary designs for the Aurora project alternatives have been reviewed by WSDOT during the course of the pre-design and environmental documentation. A formal project analysis, including consideration of the need for deviations, will be submitted for WSDOT review prior to completion of the final design. Note that recent research indicates that a right turn followed by a u-turn is safer than a direct left turn from a driveway (see: Lu, et. al., *Safety Evaluation of Right-Turns Followed by U-Turns as an Alternative to Direct Left Turns-Conflict Analysis*. Report for the Florida Department of Transportation, June 2001; and Zhou, et. al , *A Safety Comparison of Right-Turns Followed by U-Turns as an Alternative to Direct Left Turns from Driveways or Sidestreets*. Center for Urban Transportation Research, University of south Florida, June, 2001.)

**Response ID: 349      “Response ID #73”**

***Responds to Comment: A-15-18***

No significant changes in neighborhood traffic are expected due to the project alternatives. If significant changes occur, the City will evaluate implementation of neighborhood traffic control devices.

**Response ID: 350      “Response ID #75, Value Engineering”**

***Responds to Comment: A-15-19***

The current signed speed limit on this portion of Aurora Avenue is 40 miles per hour. The CATF and members of the public, including the SMA, have expressed the preference to reduce the speed limit to 35 miles per hour. The City also supports the reduction of the posted speed limit on Aurora Avenue and supported adoption of the speed reduction proposal from the Value engineering study of the Aurora project. It is currently not a part of the Aurora Avenue 145th to 165th Project to change the speed limit within the project area, however WSDOT will review the posted speed limit based upon the results of free flow spot speed studies. After completion of the project, the City may request WSDOT conduct an evaluation to determine whether the reduction of the posted speed limit is appropriate

The Secretary of Transportation has authority on setting or approving speed limits in accordance with RCW 46-61.400. Setting or changing speed limits on state highways requires appropriate engineering and traffic investigation, as described in the WSDOT Traffic Manual, Section 6.3, including a speed study, analysis of the highway geometry, and accident history. The speed limit is based on actual vehicular speed (85<sup>th</sup> percentile speed), rather than regulatory code.

**Response ID: 351      “Response ID #76, Federal Grant Requirements”**

***Responds to Comment: A-15-20***

The comment is not relevant to this project. Please contact WSDOT to discuss their demonstration projects.

**Response ID: 352      “Response ID #77, Safety and Capacity”**

***Responds to Comment: A-15-21***

WAC 468-52-040 defines the access control classification system and standards. Shoreline’s section of SR 99 is designated as Class 4 Access. Class 4 reads in part, “Highways in this class are typically distinguished by existing or planned nonrestrictive medians. Restrictive medians may be used as operational conditions warrant to mitigate turning, weaving, and crossing conflicts.” This regulation suggests that Class 4 highways do include nonrestrictive medians, including two-way-left-turn lanes. However, rejection of two-way-left-turn lanes (nonrestrictive medians) as a continuous part of the design cross-section for the alternatives is based upon the WAC 468 along with consideration of other Design guidance cited below, and the operational considerations of this particular roadway under the future design conditions.

The Washington State Department of Transportation (WSDOT) has reviewed the traffic conditions for the Aurora Avenue 145th to 165th Streets project and informed the City that this project would require a raised median (in other words, a restrictive median) for access safety improvement. WSDOT has participated in the planning and design process for

Aurora in Shoreline over the past five years and has continually been clear regarding the expectation that a raised median be included as part of the design. WSDOT presented its requirements at many public meetings as well as several City Council Meetings. WSDOT has design approval authority for any designs for improvements to Aurora Avenue and WSDOT has said a median would be required to obtain project design approval.

This corridor experiences a substantial number of accidents due in part to unrestricted access along both sides of Aurora Avenue. Adding a third lane in each direction (whether it is a BAT lane or a general purpose lane) without constructing a raised median with controlled left turns, would exacerbate the problem. A current example of this design is northbound Aurora Avenue through Seattle, between North 115th and North 145th Streets.

Recent collision history highlights an existing safety concern along Aurora Avenue from North 145th Street to North 165th Street. WSDOT's 2002 evaluation of state highways identified three High Accident Locations (HALs) in this section. In 1999, the roadway within the proposed project limits had an existing accident rate of 7.69 accidents per million vehicle miles. In 2000, this rate increased to 8.79 accidents per million vehicle miles. The statewide average for urban principal arterials in 2000 was 2.52, which was down from 2.61 in 1999. Aurora Avenue through Shoreline experiences an accident rate over three times the state average for urban principal arterials. The accident rate for this corridor is going up while the statewide average is going down.

WSDOT's design policy regarding two-way left-turn lanes (TWLTL), or in other words a nonrestrictive median, is clear. It's Design Manual Chapter 910 - Intersections at Grade (p. 910-7) states in part "Use TWLTL's only in an urban setting where there are no more than two through lanes in each direction." For highways that meet this criteria, WSDOT's Design Manual Chapter 910 stipulates, "The desirable length of a TWLTL is not less than 250 ft." Alternative A (which has the fewest openings of all the build alternatives) proposes intersection openings at North 145th, 149th, 152nd, 155th, 160th, and 165th Streets. The spacing of these intersections leaves little room for TWLTL even if the safety implications of operating such a roadway are ignored. The majority of the length between intersections is needed for left turn pockets.

**Response ID: 353      "Response ID #80, East/West Traffic"**

***Responds to Comment: A-15-22***

Capacity for East-West travel has been increased by adding approach lanes for east and west legs of intersections.

**Response ID: 354      "Response ID #85"**

***Responds to Comment: A-15-23***

The need for a median is adequately addressed above in numerous responses and in Chapter 2 – Alternatives Examined but Rejected. Signals were the most appropriate mechanisms for North 165<sup>th</sup> Street and North 152<sup>nd</sup> Street; none of the alternatives mentioned in Section 4B.04 would improve vehicular delay or safety compared to signals.



**Response ID: 355      “Response ID #86, Speed Limit”**

***Responds to Comment: A-15-24***

WSDOT has clearly stated their policy to the City of Shoreline regarding WSDOT’s requirements for justification for setting speed limits. These requirements are documented in Response ID 86. WSDOT has told the City to wait to have the traffic speed study conducted until after completion of the proposed Aurora project. It is the City’s intent to construct the Aurora 145th-to-165th Project improvements in the year 2005, which is only two years in the future.

**Response ID: 356      “Response ID #145, Signal Spacing”**

***Responds to Comment: A-15-25***

See Response ID #49 above and Chapter 3 – Transportation. The additional signals proposed would have a semi-actuated operation and would have green indications for north-south traffic unless demands for left/u-turns or from side streets occur. Also, additional approach lanes have been added at intersections. All traffic signals would be interconnected and have a coordinated operation. The additional signals are proposed to allow safe access onto Aurora from side streets to allow safe pedestrian crossings and to allow protected u-turns for access to properties and businesses. WAC 468-52-040 represents general guidelines to be followed when considering improvements to highways. The Washington State Department of Transportation retains design approval for any State Highway. WSDOT has reviewed the warrant analysis, in accordance with WAC 468, and has approved the new signals. Preliminary project design analyses documentation has been reviewed and tentatively accepted by WSDOT. Final design documentation will be submitted to WSDOT during the course of final design.

**Response ID: 357      Utilities in common trench**

***Responds to Comment: A-3-2***

The common trench discussed in the document will be constructed for the overhead utilities that will be relocated underground in this project. The common trench will also include conduit for new electrical service for illumination, traffic signals, and the traffic signal interconnect system. Existing sub-surface piped utilities such as water, storm and sanitary sewers, and gas will not be relocated into the common trench. This common trench will be placed to minimize impacts to existing utilities such as the water line. The storm drain systems will also be placed in the trench to minimize impacts to existing utilities. As with any roadway construction project, modifications to existing underground utilities may be as a result of constructing new storm drain systems, new curb locations, and new roadway surface paving. The franchise agreements that the City has with the utility providers will govern cost responsibilities.

**Response ID: 358      Water lines, hydrants, and service**

***Responds to Comment: A-3-3***

The details of potential impacts to water lines, hydrants, and service along the corridor have not yet been determined for this project and cannot be determined from the design level appropriate for the environmental analysis. These details are typically flushed out as the design of the project moves into preparation of construction plans and documents.

The City will continue to coordinate project development with the utility providers. The City met with utility providers in November 2000 to introduce the project to them. In spring of 2001, the City gave the utility providers a set of drawings that depicted all known existing utilities within the project corridor. Once design for the project is re-initiated, the City will work closely with the utility providers to coordinate relocation issues and resolve utility conflicts before the project is under construction.

**Response ID: 359      Use funds for sidewalks and stop lights**

***Responds to Comment: 4-3***

Thank you for your comment. As you are aware, one purpose of the proposed project is to improve safety for pedestrians and motorists. You suggest that tax dollars be limited to sidewalks and stoplights, however, other improvements proposed by the project, such as the raised median, which limits conflicting turning movements, would increase pedestrians and motorist safety. Furthermore, limiting the improvements to sidewalks and stop lights would not meet other needs the proposed action is intended to address, such as accommodating future regional and local demands on the facility and supporting the community goals set in the City's Comprehensive Plan.

**Response ID: 360      Use funds for other public purposes**

***Responds to Comment: 4-4, 21-2***

Funds for the proposed action will come from a variety of sources. A substantial amount of the funds are federal dollars that have been specifically earmarked for highway projects, known as Title 23 funds, and cannot be used for parks, recreational amenities, or police services. The additional crossing locations provided by the project would form connections for users for the Interurban Trail (a planned recreational amenity and non-motorized transportation link through the City). The project would also reduce traffic and pedestrian accidents, to which police would typically respond. Therefore, as a result of the project, police could respond to other demands for their services.

**Response ID: 361      Project will deprive other City areas of funding**

***Responds to Comment: 4-5***

Funds for the proposed action will come from a variety of sources. The majority of funds are federal dollars that have been specifically earmarked for highway projects. If not used for this project, these funds would not be spent in the City of Shoreline. As noted in the EA/DEIS, WSDOT has calculated that the crashes reported for Aurora Avenue North within the City resulted in losses of nearly \$8 million during the 2 years between January 1, 1999, and December 31, 2000. Research indicates that implementing access management and pedestrian-scale street lighting can reduce overall crash rates by as much as 26 percent. Reduction in property-damage-only rates have been found to be as much as 40 percent. If the proposed action results in a 52-percent reduction in crash-related losses over a two-year period, which would approximate \$4 million, the project cost would equal these recouped losses within 10 to 12 years.

**Response ID: 362      Increased pedestrian use**

***Responds to Comment: 5-5***

The purpose of the proposed action is to improve the safety of all users on Aurora Avenue North from North 145th to North 165th Streets with improved channelization, access management, and pedestrian amenities, and to improve multimodal mobility with a proposed northbound and southbound Business Access/Transit (BAT) lane. So the primary goal in providing sidewalks is to meet legal requirements and increase the safety of pedestrians along Aurora Avenue North. Three pedestrian-accident locations occur between North 145th and North 165th Streets on Aurora Avenue North due to a combination of factors including a lack of sidewalks and numerous driveway access points to the roadway. By increasing pedestrian safety through installing sidewalks, limiting driveway access, and providing additional pedestrian amenities, it is believed that safety and quality of the environment will improve and pedestrians will be encouraged to use Aurora Avenue North more than they currently do.

**Response ID: 363      Raised median may lead to business loss**

***Responds to Comment: 27-2A, 32-4, 63-33A, 64j-2A***

The EA/DEIS on page 3-56 acknowledges that the raised median could result in lost revenue to certain businesses. The EA/DEIS specifically states, "access to many businesses along Aurora Avenue North might be less desirable because of the removal of left-turn lanes and implementation of other safety improvements. This might impact businesses on the opposite side of the median that rely on impulse purchases because customers might decide to frequent competitors that are located on the same side of the street." This potential impediment will be offset by the inclusion of left-turn and u-turn opportunities (see Figure 2-4 of the EA/DEIS and Figure 2 of the FONSI for the location these turn lanes). Also, as noted in the EA/DEIS, the proposed action will benefit businesses by improving mobility within the project area, thus making businesses more accessible. In addition, the visual quality of the project area will improve, making it a more attractive destination to consumers. The experience of Union Avenue in Portland was not evaluated because it was beyond the scope of this effort.

Comment 63-33A raised the concern that drivers would not use the u-turn pockets. In the research paper entitled "Overview of NCHRP Project 3-52: Impacts of Access Management Techniques" (4th National Conference on Access Management, 2000), authors Jerome Gluck and Herbert S. Levinson suggest that "some repetitive pass-by traffic will use well-designed or conveniently located u-turn facilities" to access specific businesses. The authors also state that u-turns reduce conflict and improve safety by reducing the accident rate by 20 percent when compared to direct left-turns into driveways. Accidents are reduced by as much as 35 percent when u-turns are signalized.

**Response ID: 364      Traffic impacts to neighborhoods and appropriateness of project area**

***Responds to Comment: 27-25A***

The EA/DEIS discusses the reasons for selection of the project termini in Chapter 2 of EA/DEIS. The EA/DEIS and FONSI address potential traffic impacts to neighborhoods in the Transportation analysis under the heading "Traffic Diversion." A summary of these discussions follows.

The proposed project includes the portion of Aurora Avenue North (North 145th Street to North 165th Street) that currently has the highest average daily traffic volumes in the City of Shoreline, the highest driveway density, and many of the most congested intersections. In addition, the proposed project includes five high-accident locations and three pedestrian-accident locations, and has a crash rate that exceeds other portions of Aurora Avenue North in the City of Shoreline. The northern terminus was set at North 165th Street to incorporate major trip-generating land uses thereby accommodating that traffic within the project limits, and to address high congestion and the high-accident and pedestrian-accident locations in the intersection's vicinity. The southern terminus of the project was set at North 145th Street because it is a signalized intersection that serves as an access point for traffic flow from North 145th Street/SR 523 onto Aurora Avenue North and would provide continuity with the existing northbound BAT lane on Aurora Avenue North from North 115th Street to North 145th Street.

The proposed project would improve conditions on Aurora Avenue North from North 145th Street to North 165th Street without requiring additional improvements to the north and south on Aurora Avenue North. Improvements made along Aurora Avenue North from North 145th Street to North 165th Street would not preclude other forms of project designs elsewhere along the same arterial.

The analysis of traffic diversion indicates that under Alternatives A and B, traffic would be diverted from Greenwood Avenue North, Dayton Avenue North, Ashworth Avenue North, Meridian Avenue, and 15th Avenue North to Aurora Avenue North, thus reducing traffic impacts to these neighborhood streets.

Even though the project is not anticipated to have impacts to neighborhoods, the City proposes immediate and continuous implementation of its Neighborhood Traffic Safety Program (NTSP) for neighborhood streets adjacent to Aurora Avenue. The City has initiated conducting traffic counts and traffic speed measurements on adjacent streets. During construction and after the project is completed, the City would use the NTSP to monitor traffic conditions on neighborhood streets. If traffic conditions on the neighborhood streets warrant action, the City would work with neighborhoods to implement neighborhood traffic and control measures.

**Response ID: 365      Concerned Citizens For Shoreline/Shoreline Merchants Association plan  
Responds to Comment: 27-25B**

The CCFS/SMA Plan, proposed by the Shoreline Merchants Association and also known as Alternative C, would include two general purpose lanes southbound and northbound, one Business Access/Transit (BAT) lane in each direction, a two-way-left-turn lane, underground utilities, pedestrian safety islands and grade-separated pedestrian crossings, street lighting, and 6-foot-wide sidewalks. In Chapter 2 of the EA/DEIS, there is a section titled "Alternatives Examined but Rejected" which explains why the design proposed in the comment has been screened out of the final evaluation. The reasons for not including a two-way left-turn lane and grade-separated pedestrian crossings are described below.

The Washington State Department of Transportation (WSDOT) has reviewed the traffic conditions for the Aurora Avenue 145th to 165th Streets project and informed the City that this project would require a median for access safety improvement. The corridor

experiences a substantial number of accidents due in part to unrestricted access along both sides of Aurora Avenue. Adding a third lane in each direction (whether it is a BAT lane or a general purpose lane) without constructing a raised median with controlled left turns would exacerbate the problem.

The primary purpose of the median is to provide a safe refuge along the center of the roadway for vehicles to make left-turns and u-turns and for pedestrians to cross the roadway. The build alternatives each include left/u-turn locations at least every 800 feet. This reduces the amount of potential conflict points and increases safety substantially. Pedestrian islands alone would not provide this benefit.

Grade-separated pedestrian crossings were eliminated from consideration as part of the corridor design based on a combination of cost, right-of-way impacts, impacts to business access, and pedestrian security and comfort. Pedestrian overpasses were estimated to add \$800,000 to \$1,500,000 per crossing to the project cost compared to at-grade crossings at traffic signals which cost about \$150,000 per intersection.

Refer to Response ID 50 and 56 for additional discussion regarding why two-way left-turn lanes have not been included in the alternatives. Also refer to Response ID 293 for more information regarding why pedestrian grade separations have not been included in the alternatives.

**Response ID: 366      Misrepresentation of data and project**

***Responds to Comment: 61-4***

Thank you for providing comments on EA/DEIS. The information provided in the EA/DEIS regarding project impacts are based on verifiable data, latest modeling techniques, research studies, and best professional judgment. As described in the transportation analysis in the FONSI, the proposed action will address safety and capacity issues facing the project area.

Another purpose of the project is to support community goals set forth the City's Comprehensive Plan (page 1-1 of EA/DEIS), included among those goals is Goal LU VIII (page B-2, Appendix B of EA/DEIS):

- To redirect the changes in the Aurora Corridor from a commercial strip to distinct centers with variety, activity, and interest by:
  - Balancing vehicular, transit, and pedestrian needs
  - Creating a "sense of place" and improving image
  - Protecting neighborhoods
  - Encouraging businesses to thrive
  - Using a strategy based on sound market principles

So while the project is a transportation project, it is also intended to improve the streetscape. See Response ID 46 for additional discussion of the project's need with respect to transportation versus redevelopment.

**Response ID: 367      Visual quality improvements**

***Responds to Comment: 64-41***

All of the build alternatives, including the Proposed Action documented in the FONSI, would have a beneficial impact on the visual quality of the project area. Each build alternative would increase the level of the three basic elements that comprise visual quality: vividness, intactness, and unity. Viewer response to those changes would likely be positive. The landscape and streetscape improvements proposed under the build alternatives would increase the area's vividness and unity. Vividness would increase because the street trees would provide a memorable scene. Unity would improve because there would be a consistent, memorable visual element along the corridor. Intactness would improve when utility lines were placed underground, removing an encroaching visual element. The No Action Alternative would perpetuate the negative visual characteristics prevalent within the project area: a discontinuous street edge, numerous street signs and utility lines, and a lack of interesting visual elements, such as street trees or attractive street and sidewalk amenities. Please refer to the Visual Quality assessment in Attachment 3 of the FONSI for details regarding the proposed project's impact on the project area's streetscape. Figures 3-10, 3-11, and 3-12 in the EA/DEIS illustrate how potential amenities would make the visual environment more cohesive and visually pleasing.

**Response ID: 368      City's concern for safety**

***Responds to Comment: 27-24A***

Thank you for your concern. The purpose of the EA/DEIS and FONSI is to address the proposed project, which extends from North 145th Street to North 165th Street, not from North 145th Street to North 205th Street. Streetlights at dimly lit locations, pedestrian safety islands, and reduced speeds would not adequately address the safety issues to be addressed by the project. The primary safety concern on Aurora Avenue North from North 145th Street to North 165th Street is conflicting turning movements from the two-way left-turn lanes. The Washington State Department of Transportation (WSDOT) has reviewed the traffic conditions for this stretch of roadway and has informed the City that this project would require a median for access safety improvement. (See Response ID 50 for more information regarding WSDOT policies for raised medians and two-way left-turn lanes.)

As identified in its 2004-2009 Proposed Capital Improvement Program, the City of Shoreline anticipates completing safety improvements to Aurora Avenue from North 165th Street to North 205th Street by 2009. Completion of this Aurora Avenue 145th to 165th project is anticipated during 2005 or 2006.

**Response ID: 369      Travelers' aversion to Aurora Avenue North**

***Responds to Comment: 50-12A***

Thank you for your comment. We agree that pedestrian and bicycle activity is sparse due to personal safety concerns which result from a lack of adequate and safe facilities. Table 3-6, which shows traffic that will be diverted from parallel east-west streets with project implementation, indicating that some motorists who currently avoid Aurora Avenue would return.

**Response ID: 370      Property tax increases**

***Responds to Comment: 50-28A***

The assessment of cumulative and secondary economic impacts does indicate that assessed property values may increase as a result of this project. If redevelopment of existing properties or new development of vacant land occurs, property owners may experience an increase in property values as similar or "like" properties are improved. While the property owners would likely experience an increase in annual property taxes, the overall benefits associated with the project, such as increased mobility, will likely outweigh the increase in property taxes.

Property taxes are a cost of doing business and are subject to increases with or without completion of the proposed action. It is assumed that most property owners would pass increases in property taxes on to customers through increased prices of goods and services as well as increased rent. Voter approved levies and state-wide initiatives can also cause increases in property tax levies, within limits governed by state law.

**Response ID: 371      Relocation compensation for displaced businesses**

***Responds to Comment: 50-28B***

The Proposed Action will require the acquisition of some property for right-of-way. As a result, the proposed project, as described in the FONSI, will compensate property owners for the fair market value of their property in accordance with the *Aurora Avenue North Right-of-Way Policies and Procedures Manual* and the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. The proposed action would not result in the displacement of any businesses. Therefore, businesses would not require relocation assistance.

**Response ID: 372      Air quality impacts**

***Responds to Comment: 50-28C***

Even though model results indicate that the build alternatives would have higher maximum 1-hour and 8-hour CO concentrations in 2004 at two of the three intersections analyzed and at one of the intersections in 2020 than the No Action Alternative, the model results indicate that the project would neither increase the frequency nor severity of any existing violation of the CO standard, nor create a new violation of CO standards. At both the regional level and the project level, the project therefore conforms with the State Implementation Plan to reduce air pollution in nonattainment areas and meets all requirements of the state and federal clean air acts.

**Response ID: 373      Crash history of project area**

***Responds to Comment: 53-A***

The City and consultant team cannot attest to what was said about the "dangerousness" of the project area by individuals who are not City staff or consultant team members. The following information about accidents was provided in the EA/DEIS on pages 3-6 and 3-7:

Crash data for the study corridor were obtained from the Washington State Department of Transportation (WSDOT) for a 2-year period, from January 1999 through December 2000. . . . During this period a total of 224 collisions were recorded. Injuries resulted from 92 crashes (41 percent); 1 crash resulted

in a fatality. *The crash rates along Aurora Avenue North within the City have historically been among the highest in the state for an arterial of its type.* [emphasis added] WSDOT has calculated that the crashes reported for Aurora Avenue North within the City resulted in losses of nearly \$8 million during the 2 years between January 1, 1999, and December 31, 2000. The crash rate for the portion of Aurora Avenue between North 145th Street and North 165th Street was 8.3 crashes per million vehicle miles averaged over this 2-year period.

**Response ID: 374      Businesses leaving**

***Responds to Comment: 53-B***

As indicated by the comment, the proposed project is needed to address both transportation safety concerns and economic development needs. If a business owner has decided to leave because of the proposed project prior to the project's implementation the City regrets that decision and hopes that business owner chooses to stay in the City of Shoreline.

**Response ID: 375      Project consistency with City's plans and policies**

***Responds to Comment: 61-26A***

Appendix B of the EA/DEIS discusses the project's consistency with the City of Shoreline's plans and policies. As identified in Appendix B, the project would address the City's Comprehensive Plan Goal LU VIII.

- Goal LU VIII: To redirect the changes in the Aurora Corridor from a commercial strip to distinct centers with variety, activity, and interest by:
  - Balancing vehicular, transit, and pedestrian needs
  - Creating a "sense of place" and improving image
  - Protecting neighborhoods
  - Encouraging businesses to thrive
  - Using a strategy based on sound market principles

All build alternatives would provide additional vehicular, transit, and pedestrian access to businesses along Aurora Avenue North, as well as pedestrian and roadway lighting. They would provide sidewalks along the corridor, pedestrian lighting, and landscaping. Collectively, these improvements would improve the aesthetics of the corridor and would make the corridor more attractive for business and retail activity.

**Response ID: 376      Access management as an urban renewal tool**

***Responds to Comment: 61-63A***

The Land Use section of the EA/DEIS (page 3-26) and FONSI acknowledge that properties along Aurora Avenue North developed with strip commercial uses during different eras and under King County zoning requirements until City incorporation in 1995. While this history has led to access management problems, these problems cannot be overlooked simply because they were the result of uncoordinated development. The intent of the project's access management solutions is to address safety concerns and not to eliminate businesses. However, the EA/DEIS and FONSI Economics analysis does acknowledge that an unintended consequence of removing the two-way left-turn lane could be the loss of some sales to certain types of businesses.



As described in the EA/DEIS Transportation analysis (page 3-14) and FONSI, the comprehensive access management improvements would include addition of curbs and gutters, application of driveway width and spacing standards, conversion of the existing two-way left-turn-lane into a channelized left-turn and u-turn lane and a median, restriction of driveways to right-turn-in and right-turn-out only, and provision of the BAT lanes. These improvement would allow traffic to safely enter and exit the roadway with fewer conflicting movements and lower risk of crashes. Recent research (Parsonson et al., 1993) indicates that implementing access management can reduce overall crash rates by as much as 26 percent and reduce property-damage-only rates by as much as 40 percent.

The EA/DEIS Economics analysis (page 3-56) and FONSI state that "...access to many businesses along Aurora Avenue North might be less desirable during operations because of the removal of left-turn lanes....This might impact businesses on the opposite side of the median that rely on impulse purchases because customers might decide to frequent competitors that are located on the same side of the street." This impact would be partially offset by the inclusion of left- and u-turn opportunities. Impacts to businesses such as reduced direct access are anticipated to be offset by increases in mobility and exposure to a larger customer base, and improvements to traffic and pedestrian safety and to the roadway and road edge appearance.

**Response ID: 377      Alternative within the existing right-of-way**

***Responds to Comment: 61-63B***

NEPA and SEPA require that a range of reasonable alternatives be examined; they do not require that all alternatives be examined. The City has included three build alternatives that it believes represent the range of reasonable designs that would meet the project's stated purpose and need.

**Response ID: 378      City's social and economic policies**

***Responds to Comment: 61-63C***

Comments acknowledged. Community participation is important to the development of the City's policies; however, not everyone citizen will be pleased with every decision. It is not within the scope of the environmental documentation prepared for the proposed action to revisit decisions made during preparation and adoption of the City's Comprehensive Plan.

**Response ID: 379      Basis for reducing business access points (driveways)**

***Responds to Comment: 61-65A***

The comment states that "skewed and incomplete data" were used, but does indicate which data in particular. The data used to assess existing conditions are presented in the Transportation section of the EA/DEIS (pages 3-3 through 3-23), and include the number of driveways and types of access (full or right-in/right-out only), traffic volumes, level of service (a measurement of congestion), and crash experience.

The City intends to apply State and City guidelines when developing the designs and spacings for driveways. The City may issue nonconforming connection permits to provide access to parcels and one access point shall be provided to an individual parcel or to contiguous parcels under the same ownership. As discussed in many presentations and meetings with the public and at City council meetings, the project alternative designs would

be developed to maintain access to parcels. The City and WSDOT will work with property owners and business owners to develop adequate driveway access. The City believes that the State and City guidelines allow sufficient flexibility to accomplish adequate access points to properties.

**Response ID: 380      Timely delivery of goods**

***Responds to Comment: 63-26A***

The Transportation section of the EA/DEIS and FOSNI discusses potential impacts to the delivery of goods in the project under the heading “Truck and Emergency Vehicle Access.” While access opportunities across Aurora Avenue North would not change under the No Action Alternative, the increased volumes along Aurora Avenue North would effectively block access across the roadway for much of the day because there would be fewer gaps in the uncontrolled traffic flow to allow for safe movement in and out of driveways.

The project’s raised medians would affect routing and access to properties along Aurora Avenue North. Trucks accessing Aurora Avenue North from I-5 would be able to position for right-in/right-out access by using North 175th Street interchange to enter properties on the western side of the roadway and the North 145th Street interchange to enter properties on the eastern side. Westminster Way would also provide an alternate truck route to position for right-in/right-out access. Furthermore, most commercial properties along Aurora Avenue North would continue to be accessible using driveways to sites within 300 feet along cross streets.

Access to properties would be maintained by locating the median openings at major truck access points where practical (see Figures 2 and 3 in the FONSI for locations for the Proposed Action). These openings would make it possible for trucks and emergency vehicles to make left turns into properties along the project. The openings would be designed to accommodate a WB-55 design vehicle, which is typically the largest type of vehicle that uses major arterials.

**Response ID: 381      Surface water quality impacts**

***Responds to Comment: 63-94A***

There are no streams, lakes, or wetlands within the proposed project area. However, the project is situated near the headwaters of the Boeing Creek, Thornton Creek, and West Lake Washington (Densmore) basins in a highly urbanized section of the City of Shoreline. Potential impacts to these basins were considered in the Water Quality/Surface Water section of the EA/DEIS. The results of the analysis are summarized below.

**Construction.** During construction, accidental or inappropriate discharge of sediment from cleared and excavated areas and/or spills of fuel, lubricants, and other construction-related hazardous material could result in these materials entering project area streams via stormwater runoff. The likelihood of this happening will be minimized through the implementation of construction-related best management practices (BMPs). Proposed BMPs are listed in the FONSI.

**Operations.** While the stormwater runoff volumes and peak flow rates discharged to Boeing Creek would experience a small increase, the increase would be so small that it should not have a flow- or volume-related impact on the aquatic habitat in Boeing Creek. In

the Densmore basin there would be no change in impervious areas, so the peak flows and volumes of stormwater runoff delivered to the downstream system should be unchanged and would not affect aquatic habitat in the basin. The stormwater runoff volume discharged to Thornton Creek would increase by such a small amount that the flow-related impacts would be minimal and should not have a stormwater-volume-related impact on the aquatic habitat in Thornton Creek.

With respect to stormwater quality, the project would provide treatment facilities in an area which is not currently served. In addition, special oil control facilities would be installed at the intersections of Aurora Avenue North with North 145th Street and North 155th Street. Because runoff from the existing road is not currently treated, implementation of the proposed stormwater quality treatment should result in a substantial decrease in the pollutant load (especially total suspended solids and other associated pollutants) carried by the stormwater runoff from the roadway to each of the receiving waters. The biggest impact should be an improvement in the overall water quality in Boeing Creek because most of the proposed project area is within the Boeing Creek basin. The installation of the stormwater quality treatment facilities in the Thornton Creek and West Lake Washington (Densmore) basins might provide a slight improvement in the water quality of the receiving streams, but because the proposed project area within these basins is so small relative to the total drainage area in these basins, the improvements are not expected to be discernible.

**Response ID: 382      Difference between independent utility and development concurrency with transportation**

***Responds to Comments: 63-84***

The discussion of independent utility on page 2-4 of the EA/DEIS addresses how the proposed project would provide improvements to the transportation system whether or not additional transportation improvements are made elsewhere along the corridor. This is not the same subject that is discussed in the following sentence: “The design of the build alternatives – by adding traffic capacity, nonmotorized amenities, and transit facilities – includes mitigation of secondary impacts and will help future development attain transportation concurrency.” The foregoing sentence is addressing the proposed project’s ability to accommodate the development permitted by the City’s Comprehensive Plan.

**Response ID: 383      Highway designation**

***Responds to Comments: 61-65B***

Aurora Avenue North, part of SR 99, is a Class 4 facility according to the WSDOT Access control classification system and standards. Within this class, access management measures are identified, such as minimum driveway spacing of 250 feet and installation of medians to mitigate turning, weaving, and crossing conflicts that affect safe travel. Based on the urban environment served by Aurora Avenue North and the high traffic volumes it carries, the street’s design is deficient in terms of access management for the preservation of safety and traffic operations.

The City has coordinated with WSDOT regarding the appropriate design guidelines for this project. Through that process, WSDOT has provided direction that this project does not fall within typical design classes for Full Design Level guidance. Based on the type and context of this project, a modified design classification will be developed and approved for this

specific project, allowing 11-foot-wide general-purpose lanes, a 12-foot-wide lane adjacent to the median curb, and an 11-foot-wide (w/a 2-foot shy) Business Access/Transit (BAT) lane and up to a 16-foot-wide median with a 4-foot-wide median at the intersections. These design elements will accommodate both regional and local traffic.

Pedestrian, landscape, and utility undergrounding will provide the other improvements needed to improve the quality of the pedestrian experience within the corridor and to provide the corridor with an identity of its own. Thus, the transportation needs of the corridor and the City's goals for an activity center can both be accommodated.

**Response ID: 384      Funding priorities**

***Responds to Comments: 4-5***

The majority of funds for the proposed project come from non-City of Shoreline sources, and without this project would not be otherwise available to the City. Furthermore the proposed project addresses transportation needs within a specific area and the proposed improvements address those needs without requiring improvements outside that area.

**Response ID: 385      Use of accident data**

***Responds to Comments: 63-83A***

As stated in the "Purpose and Need" section of the EA/DEIS (page 1-1), the purpose of the project is to improve the safety of all users on Aurora Avenue North from North 145th Street to North 165th Street. A very good indicator of a roadway's level of safety is the number accidents that occur on it. The EA/DEIS accurately describes the accident experience along Aurora Avenue North as among the highest in the state for a facility of its type, which is an urban principal arterial. The purpose for providing this rate is to show how the rate for accidents on the existing Aurora Avenue roadway compares to the average and to show that the accident rates for much of Aurora Avenue are substantially worse than the average. Because accident data are an important indication of what is happening within the project corridor, it is cited in a number of relevant locations in the EA/DEIS, such as "Need for the Project" on page 1-1, "Rationale for Establishing the Scope of the Project" on page 2-2, and "Crashes and Safety" on page 3-6 in the Transportation analysis.

Please refer to Response ID 239 for a discussion of the WSDOT data provided by a person commenting on the EA/DEIS.

**Response ID: 386      Central Shoreline Subarea Plan vs. Phase II of the Aurora Corridor Project**

***Responds to Comments: A-16-1***

The Aurora Avenue project is defined in two phases:

- Phase 1 from NE 145th to NE 165th
- Phase 2 from NE 165th to NE 205th

Your e-mail seems to indicate that you perceive the City's project as divided into three phases. In reality, what you are calling phase II (Central Shoreline Subarea Plan), is a land use planning document that is part of the city's master plan. As such, this planning study falls outside of the realm of development of the City's Aurora Avenue project, and outside of the purview of the National Environmental Policy Act (NEPA). It relates only in that, as a

land use plan, it will show the right-of-way of Aurora Avenue as a "land use", just as this plan would show all other "land uses" within the study area. We have been told by the City that the right-of-way shown in the Central Shoreline Plan is as it may be defined in the ultimate Aurora Avenue project. But please keep in mind that whatever right-of-way is indicated in the Central Shoreline Subarea Plan will not be used as criteria to determine the preferred alternate for the City's Aurora Avenue project from 165th to 205th.

**Design Features of the Proposed Project.** Many factors are used to determine the roadway geometrics such as traffic volumes, roadway type and classification, lane width, curves, sidewalks, etc. during project development. Aurora Avenue North is part of the National Highway System through Shoreline, and this triggers higher design guidelines.

The current average daily traffic (ADT) is approximately 40,000 vehicles per day for this section of the highway. High traffic volumes, combined with the distance a vehicle would need to travel to cross the opposing traffic, creates an unsafe condition. There are a variety of design documents and laws that have helped guide the current design. Specifically, Washington State Department of Transportation's (WSDOT) Design Manual Chapters 410 and 430 describe median designs, and Chapter 910 addresses the use of two way left turn lanes. In addition, the Washington Administrative Code (WAC 468-52-040) defines the access control classification system.

For projects with pedestrian generators, sidewalks are required. The minimum sidewalk width is five feet, but additional width is encouraged if appropriate.

The project has minimized the roadway width by using 11-foot travel lanes instead of 12-foot travel lanes. The seven-foot sidewalk and six-inch curb widths were set to fit the scale of the roadway and the sidewalk width will be reduced to minimum Americans with Disabilities Act (ADA) requirements where there are conflicts with existing buildings.

**Aurora Avenue Project from 145th to 165th.** Timothy Stewart, the City of Shoreline's State Environmental Policy Act (SEPA) Responsible Official, approved the SEPA Final Environmental Impact Statement (FEIS) on November 23, 2002 for the project on Aurora Ave North from 145th to 165th. The SEPA process is a state process and outside of FHWA's jurisdiction.

You may be aware that this phase of the work was reviewed under both the SEPA EIS and the Federal National Environmental Policy Act (NEPA), because Federal funding was received. Under NEPA, an environmental assessment (EA) was prepared and approved by Elizabeth Healy of my staff for distribution for public review on July 3, 2002. As part of the development process of the EA, Elizabeth held several meetings to discuss the appropriate project limits. Elizabeth included our legal counsel in the process to define logical termini and independent utility. FHWA legal counsel reviewed the relevant portion of the EA on this topic, and concluded that the information included within the EA supported the decision that the project from 145th to 165th has independent utility and logical termini. Since FHWA established that the project from 145th to 165th has independent utility and logical termini, a full analysis of the direct impacts from the future 165th to 205th project was not required for the EA. It was analyzed as a cumulative future action.

We received a FONSI package for review and approval, which was reviewed by both Elizabeth and our legal counsel. Elizabeth submitted comments on the document for

revision, and a new FONSI package has been submitted to FHWA for approval, and is currently under review.

In regards to your comments about a lack of public involvement in this phase, the City provided for an extensive community involvement process. This process is described in the EA approved for circulation last June, the Final SEPA EIS, page 4-3, that was approved last November, and is included in the FONSI package currently under review at FHWA.

Both FHWA and the WSDOT will work with the City to ensure the community is involved planning efforts for the future project from 165th to 205th. This section would describe how the proposed transportation alternatives would affect business and residential areas.

**Central Shoreline Subarea Plan.** The Central Shoreline Subarea Plan is a land use/comprehensive plan that is under the City of Shoreline's jurisdiction, and FHWA is not involved in this process. However, if the Subarea Plan specifies the corridor for a future NEPA document, we will not be able to accept decisions made through that process since it is not a NEPA process. A reasonable range of alternatives will need to be considered in the future NEPA project. Some of the subarea planning decisions may be evaluated in the NEPA process when the reviews of the various transportation alternatives are reviewed and analyzed.

**Aurora Avenue Project from 165th to 205th.** There is a future planned project on Aurora from 165th to 205th. The NEPA process has not been started. Once this process is started, both FHWA and WSDOT will ensure that the City of Shoreline follows the proper procedures and processes. This oversight will include making sure that the affected business owners will be contacted and will be included in the planning and environmental processes. As of today, no determination has been made as to whether or not a NEPA EIS will be required. Your e-mail indicates that numerous businesses may be permanently displaced. The area of the possible business displacements is in the future 165th to 205th project. Both FHWA and WSDOT take this issue seriously and would expect that any planning or environmental process the City undertakes would include a section on Environmental Justice. This section would describe how the proposed transportation alternatives would affect business and residential areas. Such a section was included in the FONSI package, Chapter 3-14, for the project from 145th to 165th that is currently in our office for review.

**Response ID: 387      Responses to comment letter 63 revised since FEIS publication**

**Responds to Comments: A-17-1, A-17-2, A-17-3, A-17-5, A-17-7, A-17-8, A-17-9, A-17-10, A-17-11, A-17-13, A-17-15, A-17-16, A-17-17, A-17-18**

The response referenced in Comment Letter A-17 has been revised since publication of the FEIS. The revised response is contained in this FONSI. Please refer to the original Response ID for the revised response. Based on the content of comment A-17-2, the author of the comment is referred to Response ID 24 not Response ID 25. For comment A-17-8, the referenced Response ID should be Response ID 58 not 39.

**Response ID: 388      Additional responses to comment letter 63 since FEIS publication**

***Responds to Comments: A-17-4, A-17-6, A-17-14, A-17-19***

Responses have been prepared for the following comments. Please refer to the Response ID indicated.

<b>Comment</b>	<b>Response ID</b>
A-17-4	380
A-17-6	363
A-17-13	382
A-17-19	321

**Response ID: 389      Design and Right-of-Way for the Project**

***Responds to Comments: A-18-1***

Following is the response provided to you from FHWA Division Administrator, Dan Mathis, in previous correspondence. The response addresses the issue of the design and right-of-way for this project.

Your e-mail seems to indicate that you perceive the City's project as divided into three phases. In reality, what you are calling phase II (Central Shoreline Subarea Plan), is a land use planning document that is part of the city's master plan. As such, this planning study falls outside of the realm of development of the City's Aurora Avenue project, and outside of the purview of the National Environmental Policy Act (NEPA). It relates only in that, as a land use plan, it will show the right-of-way of Aurora Avenue as a 'land use', just as this plan would show all other 'land uses' within the study area. We have been told by the City that the right-of-way shown in the Central Shoreline Plan is as it may be defined in the ultimate Aurora Avenue project. But please keep in mind that whatever right-of-way is indicated in the Central Shoreline Subarea Plan will not be used as criteria to determine the preferred alternate for the City's Aurora Avenue project from 165th to 205th. The Central Shoreline Subarea Plan is a land use/comprehensive plan that is under the City of Shoreline's jurisdiction, and FHWA is not involved in this process. However, if the Subarea Plan specifies the corridor for a future NEPA document, we will not be able to accept decisions made through that process since it is not a NEPA process. A reasonable range of alternatives will need to be considered in the future NEPA project. Some of the subarea planning decisions may be evaluated in the NEPA process when the reviews of the various transportation alternatives are reviewed and analyzed.

**Response ID: 390      Use of Funds and Conflict of Interest**

***Responds to Comments: A-18-2***

Federal funds can be used for the appropriate "preliminary engineering" functions that are a part of the NEPA process — i.e., that are project specific. This would be distinct from the land use planning document that is part of the City's master plan. As such, this planning

study falls outside of the realm of development of the City's Aurora Avenue project, and outside of the purview of the National Environmental Policy Act (NEPA). As for "conflict of interest", some design is necessary for developing alternatives for the NEPA process and it would not be a conflict of interest for the consultant doing the NEPA document to be doing that level of design. We have previously informed the City that any decisions made through their land use master plan cannot be used as the sole decision-making tool for any future NEPA documents through that corridor.

**Response ID: 391      Right-of-Way Acquisition and the Use of Federal Funds**

***Responds to Comments: A-18-3***

If you mean by the City "setting the ROW" that they are determining the design criteria to include the ROW dimensions, then whether or not subsequent ROW acquisitions would be eligible for Federal reimbursement would depend upon what ROW is actually incorporated into the final project design and construction. For example, any ROW acquired that is excess to the designed and constructed project would not be eligible for Federal participation UNLESS it was property that was determined to be an uneconomic remnant. (Federal law requires acquiring agencies to offer to purchase uneconomic remnants.)

If you mean by the City "setting the ROW" that the City is going to buy ROW in advance of NEPA clearance, there are a series of conditions and restrictions that apply to such acquisitions. Except in very limited circumstances (as defined in the Federal regulations at 23 CFR 771.117), Federal reimbursement for "advance acquisition" is not allowed. The agency can, however, utilize the fair market value of property acquired in advance of NEPA clearance toward their matching share of the project cost. However, again only that property that is actually required for the designed and constructed project can be used for match; and, by law, the early acquisition of ROW cannot be used as a justification for the selection of a particular project alternative.



ATTACHMENT 5-4

## **Environmental Hearing Transcript and Comment Letters**

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2  
3  
4  
5 CITY OF SHORELINE  
6 DRAFT ENVIRONMENTAL IMPACT STATEMENT  
7 AND ENVIRONMENTAL ASSESSMENT  
8  
9 OPEN HOUSE and PUBLIC HEARING  
10  
11  
12  
13  
14

15 DATE: TUESDAY, AUGUST 6, 2002  
16

17 PLACE: Shoreline Conference Center  
18 18560 First Avenue Northeast  
19 Shoreline Room  
20 Shoreline, Washington  
21

22 REPORTED BY: Mary Mejlaender, CSR. No. ME-JL-EME-433R8  
23  
24  
25

## OPEN HOUSE ORAL COMMENTS

MS. COOK: My name is CaraLee Cook, and that's C-A-R-A capital L-E-E, Cook, and I live at 903 North 170th in Shoreline, Washington, which is two blocks west of Aurora.

Okay. So I, in general, support the project as it's -- the Draft Environmental Impact Statement as it's been presented, but I have two concerns. And the first concern for me is, of course -- the most important concern for me is spillover traffic into the neighborhoods. And I was going to say that I have the page number, even.

I don't agree with the Draft Environmental Impact Statement where it states that there will be less traffic diverting into the neighborhoods under the Alternative A or B. So I don't agree with that. I think that it's really obvious that there would be more traffic that would come into the neighborhoods if there's a median. So that page is XIX that I don't agree with.

And I would like to at least suggest for the record that the city consider having frequent left-turn lanes in the medians. And please consider in the price of the project having traffic circles up to two blocks on either side of Aurora on the, um,

considered pedestrian safety and the safety of occupants of vehicles using the corridor as their paramount concern.

Providing the minimum distance of a four-foot amenity strip between vehicles traveling between 30 and 40 miles per hour and pedestrians walking along the roadway is necessary. The roadway in Edmonds and Lynnwood is very utilitarian to moving vehicles but does not provide for water quality, pedestrian lighting, undergrounding of utilities or landscaping. One might ask why didn't Edmonds and Lynnwood desire these amenities within their portion of the Aurora corridor if the Citizens Advisory Task Force members considered these amenities so important to the vitality of the community and Shoreline businesses?

I think I have the answer. The City of Edmonds considers Fifth and Main Street to be the center of their business district, and Lynnwood considers 196th and 44th Avenue West as the center of their business district. In these two areas you'll find the respective city halls, wide sidewalks, undergrounding of utilities, pedestrian lighting and amenity strips.

In the case of Shoreline the Aurora corridor is our primary business district. It's the center of our city. Our city hall is here. Although our city must

neighboring streets because I think more traffic will be coming into my neighborhood.

So the second concern I had was sidewalks. And I just want to say that I support the wide sidewalks, eight-foot, and the four-foot I guess what they're calling that strip zone -- I'm forgetting the word -- four-foot amenity zone. But where buildings would be compromised I think that's just too expensive. And so where buildings would be torn down or encroached upon I would like to suggest that in those areas they go down to the seven-foot or Alternative B alternative for the road.

So I think that's all I had to say.

MR. HARLEY O'NEIL: My name is Harley O'Neil, 1521 Northwest 190th Street, Shoreline, Washington, 98177.

I'm here to talk in favor of Alternative A.

Opponents to Alternative A of the Aurora Corridor Project suggest that Shoreline's Aurora corridor be built to resemble the corridor that's already been constructed through Edmonds and Lynnwood. I disagree with this suggestion because I do not believe the Edmonds/Lynnwood corridor adequately addresses pedestrian and vehicle safety. The members of the Aurora Pre-Design Citizens Advisory Task Force

continue to provide support and revitalization to north city businesses, businesses at 15th Northeast and 145th Street, Richmond Highlands, Richmond Beach and Ballinger Way, the Aurora corridor has always been and will continue to be our primary business district. It is for this reason that we must make this corridor a safe and attractive place to do business.

Addressing water quality, providing for pedestrian street lighting, undergrounding overhead utilities, providing landscaping in the four-foot amenity strip will all contribute to make the Aurora corridor a safe and pleasant place to do business. Alternative A accomplishes that goal. I urge your support of Alternative A.

MS. COOK: CaraLee Cook, C-A-R-A capital L-E-E Cook. I live at -- did you want the address again, too?

Okay. So this is a strange concern. I looked through this. The cost of Alternative A and B are not estimated for Phases 2 and 3. Like they -- they compare A and B in Phase 1. And what I noticed is that in Phase -- in Phase 2 is where Alternative A would cost a great deal more because that's where there's going to be some building demolition.

So I think since most of the buildings that

1 require demolition would drive up the cost of the  
 2 T-5 project considerably are in Phase 2, the EIS or the  
 3 DEIS does not give a true picture of the cost of the  
 4 Cont. alternatives. And so I would recommend that the city  
 5 analyze the costs of Alternatives A and B in Phase 2  
 6 before deciding on a design choice.

7 I'd written that down, luckily. So that's all.  
 8 Thank you.

9 MS. HELFERTY: Hi. Mary Ann Helferty. My  
 10 address is 312 North 160th Place, Shoreline,  
 11 Washington, 98133.

12 I want to speak in support of Option A, where we  
 13 will have three advantages over the current situation.

14 T-6 The three concerns I have are improved pedestrian  
 15 safety and reduced liability for me as a frequent  
 16 driver on Aurora. The second concern that I have is  
 17 to improve the transit throughput on Aurora as a bus  
 18 rider. That's important to me.

19 And the third issue is that I really want to  
 20 speak for the wide sidewalk and amenity buffer as  
 21 improving the beauty of my neighborhood and my  
 22 community. I want to speak a little bit about each of  
 23 these three ideas.

24 The first idea is that I drive on Aurora to do  
 25 my grocery shopping. I drive on Aurora to run

1 errands. And it could be any time of night. And I  
 2 feel sad to see two people particularly troubled by  
 3 our poor pedestrian safety on Aurora. The first are  
 4 there's many disabled people who catch buses on Aurora  
 5 to get services, and it just breaks my heart  
 6 seeing them trying to navigate with the fast traffic  
 7 and no sidewalk and buffer. It's just cruel and a  
 8 lack of compassion to not want a better situation for  
 9 these people.

10 The second part of that is I really do feel that  
 11 I see poor people who work there who have to take the  
 12 bus to get to Aurora. They cross the street because  
 13 there's no good place for them to cross and it's very  
 14 difficult, and I just feel concerned that some day,  
 15 because it's dark or because the traffic's crazy, I'll  
 16 hit someone crossing or jaywalking because they don't  
 17 have a better option. And that's why Alternative A is  
 18 better for me because it has the left-turn pockets and  
 19 the raised landscaped median.

20 As I said, I ride the bus to work every single  
 21 day, and a lot of people need to use the bus who are  
 22 disabled or who are poor and it's really important we  
 23 consider their needs.

24 And then the third point is I think that Aurora  
 25 is a little bit of a dinosaur. I would really like

1 for -- I think my property values and my neighborhood  
 2 would be a better place to live if we had a business  
 3 district with more beauty and more pedestrian  
 4 amenities. I really love the feeling of what they're  
 5 trying to do at Central Market to create gathering  
 6 places, and I think Aurora has potential to be more of  
 7 a main street for Shoreline with a wide amenity and  
 8 buffer zone, trees that would reduce the heat effect  
 9 and provide more shelter, and we'd see different  
 10 businesses moving onto Aurora if it had more street  
 11 beautification.

12 So, in summary, I'd just like to ask the council  
 13 and I'd like to ask the other agencies to support  
 14 Option A in the Environmental Impact Statement. My  
 15 three concerns are that it improves pedestrian safety,  
 16 that it increases the ability of public transit to  
 17 serve the population of Shoreline, and that it will  
 18 increase business values on Aurora by allowing for  
 19 more beautiful, wider and more pedestrian friendly  
 20 sidewalks.

21 Thank you so much.

22 MR. DAHER: My name is George Anthony Daher. I  
 23 live at 2137 North 194th.

24 And I -- I --

25 MR. RAMONE: Excuse me. Three minutes, and at

1 the end of the last minute I'll --

2 MR. DAHER: I was told two.

3 MR. RAMONE: Okay. We'll start with three. So  
 4 when you're ready.

5 MR. DAHER: I'm here representing myself and the  
 6 Green Elephant Society, a group that has been  
 7 dedicated to pedestrian safety and litter control.

8 I would like to see -- make sure that certain  
 9 standards are put in place to make sure that any  
 10 businesses that have a high incidence of litter  
 11 production, that being fast food restaurants or  
 12 convenience stores, that they are held responsible for  
 13 any of the litter that they find -- that is easily  
 14 traceable to their businesses.

15 I'd also like to make sure that adequate  
 16 measures are taken to protect pedestrians -- I should  
 17 say enforce the laws that already exist that protect  
 18 pedestrians. We'd like to see an Environmental Impact  
 19 Statement that covers more than 50 feet away from  
 20 Aurora. We'd like to see an Environmental Impact  
 21 T-7 Statement that covers as far -- anywhere from 500 to a  
 22 thousand feet from Aurora to measure the impact  
 23 from -- as to how pedestrians are able to cross  
 24 streets in -- in their own neighborhoods off of the  
 25 stree -- away from the street.

Draft Environmental Statement

Page 10

1 I think that's -- that should be the rest of my  
2 comment. Thank you for your time today.

3 (7:10 p.m.)

4 PUBLIC HEARING

5 COMMISSIONER DOENNEBRINK: Welcome to the  
6 Environmental Assessment/Draft Environmental Impact  
7 Statement Hearing on the 145th to 165th Aurora  
8 project. The purpose of this hearing is to gain  
9 feedback on the Draft Environmental Impact  
10 Statement/Environmental Assessment for the pro --  
11 proposed Aurora project between 145th and 165th in the  
12 City of Shoreline.

13 This environmental hearing is being held to  
14 comply with the provisions of the Federal Aid Highway  
15 Act, Title 23, Section 128 of the United States Code,  
16 and Title 23, Part 771, and Title 40, parts 1500  
17 through 1508 of the Code of Federal Regulations.

18 The hearing also complies with the State  
19 Environmental Policy Act of 1971, Chapter 197-11, and  
20 Chapter 468.12 of the Washington Administrative Code,  
21 Chapter 43.21C and Chapter 47.04 of the Revised Code  
22 of Washington.

23 The Planning Commission is in front of you here,  
24 but they won't have any special role in the decision  
25 process for the EIS. They may, however, as

Page 12

1 the map. The only project that a decision is being  
2 made about with the hearing on this document is Aurora  
3 Avenue North from 145th to 165th.

4 Moving on to the third page, the one with the  
5 pictures are typical cross-sections for the three  
6 alternatives studied in the environmental document.

7 Page 4 is tonight's agenda. It also starts the  
8 section on project history, which continues on other  
9 pages, and other information pertinent to the meeting  
10 tonight.

11 There's a matrix that summarizes operational  
12 impacts of the 145th to 165th project, which is right  
13 here (indicating). There's a section on ADA,  
14 Americans with Disabilities Act Title 6 notices.  
15 Okay. (Indicating). It would be near the end. And  
16 the very last, one of the most important pages, is the  
17 public comment form. Goldenrod color, we'll call it.

18 As a reminder, all comments, written and oral,  
19 are reviewed and -- or will be reviewed and responses  
20 will be prepared to be included in the Final  
21 Environmental Impact Statement or FEIS. And you can  
22 expect that it will be released tentatively in October  
23 of this year. The Federal Highway Administration  
24 issues a finding of no significant impact under NEPA,  
25 if appropriate, in November.

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1 individuals, submit comments, or we can hold an  
2 additional meeting to, as a group, offer comments on  
3 this document.

4 Before we get into the environmental hearing  
5 packet I wanted to recognize the presence of some  
6 officials. I saw Representative Ruth Kagi here.  
7 There she is. And is Representative Chase here?  
8 Marilyn Chase? No. I haven't -- okay. City of  
9 Shoreline Deputy Mayor Kevin Grossman. I saw him.  
10 No. He must have stepped out.

11 And City of Shoreline Council Member John Chang.  
12 I saw him. Okay. And there's, what, somebody else  
13 I'm missing? I saw former mayor of Shoreline Connie  
14 King. There she is. Who else am I missing? Chair of  
15 our Parks and Cultural Recreational Services  
16 Commission Dwight Stevens is over here.

17 Any other public officials that I'm missing  
18 besides the city -- city staff? They don't want to be  
19 introduced? No?

20 Okay. Well, let's review the environmental  
21 hearing packet, then, which hopefully everybody got  
22 one of those. Did everyone? This one (indicating).  
23 The pages aren't numbered, but the one that has the  
24 welcome that's Page 1 has information about the  
25 hearing, comments and decorum and courtesy. Page 2 is

Page 13

1 After that the final design is to begin to be  
2 prepared with input from business and property owners,  
3 specifications, estimates and right-of-way acquisition  
4 in December and January.

5 How the hearing will run tonight, each person  
6 may speak for three minutes. If you're the official  
7 designee of a group or organization you may speak for  
8 five minutes. Further comments should be submitted in  
9 writing. Neither staff, consultants or commissioners  
10 will be answering questions or discussing the project  
11 during or after the hearing. So do not expect answers  
12 to questions.

13 I will read off the names of those wishing to  
14 testify from the sign-up sheet in the order that they  
15 signed up. I will read three names in sequence. So  
16 you may step to the vacant podium to my right here,  
17 and be ready to present your testimony when the  
18 previous speaker finishes.

19 Please note that we are recording the testimony  
20 via the court reporter and electronically. Verbatim  
21 transcripts will be produced and will be included in  
22 the FEIS product which may be under a separate cover  
23 for -- which will be available for purchase. I will  
24 close the hearing when everybody has had a chance to  
25 testify.

4 (Pages 10 to 13,

1 Title 6 of the Civil Rights Act of 1964 requires  
2 the Washington State Department of Transportation to  
3 gather statistical data on participants and  
4 beneficiaries of the Department's Federal Aid Highway  
5 programs and activities. Washington State Department  
6 of Transportation is collecting information on race,  
7 color, national origin and gender of the attendees to  
8 this public hearing to ensure the inclusion of all  
9 segments of the population by a proposed project.

10 The Department of Transportation wishes to  
11 clarify that this information gathering is completely  
12 voluntary and that you are not required to disclose  
13 the statistical data requested in order to participate  
14 in this meeting. The information gathered will be  
15 handled in strict confidential -- confidentiality by  
16 the hearing coordinator and the Department of  
17 Transportation Office of Equal Opportunity.

18 For further information regarding this process,  
19 please contact the Title 6 coordinator at (360)  
20 705-7098. These forms are available at the sign-in  
21 table where you came in tonight.

22 Now, as you noticed, there's quite a large group  
23 here, and we need to efficiently move through the  
24 testimony so that everybody has time. Everything's  
25 being recorded so it's important to keep these

1 behaviors in mind: First, as an audience member,  
2 please be respectful of the other speakers. Do not  
3 boo, clap, cheer, groan or make other disruptive  
4 noises. These behaviors interfere with the official  
5 recording of the hearing.

6 Secondly, please, if you want to carry on a  
7 conversation during the hearing, leave the room. If  
8 you have a question of a staff member, please ask them  
9 to go out in the hall with you to ask it. Third, as a  
10 speaker, please avoid using offensive or threatening  
11 language. And lastly no placards that include hard  
12 materials will be allowed in the room for safety  
13 purposes.

14 Some keys to effective testimony for this  
15 hearing, remember that you have three minutes as an  
16 individual or five minutes as an official designee of  
17 a group or organization. You will be timed and I'll  
18 cut you off if you run over. State your name and  
19 address for the hearing record. And be specific and  
20 concise in your comments or questions, and if possible  
21 cite page numbers or figure numbers.

22 The FEIS process requires the response to all  
23 comments received in the document. If the speaker  
24 that precedes you has said what you wanted to say,  
25 acknowledge it, but please don't repeat it. We have

1 many speakers and hope to get a chance for all to  
2 testify tonight. If you have questions about the  
3 document or project you may state them, but please do  
4 not expect an answer to be given during the hearing.  
5 Answers will be provided in the Final Environmental  
6 Impact Statement.

7 If you have other questions or comments not  
8 related to this, please write them on a non-DEIS  
9 comment card and leave them at the sign-in table by  
10 the door. If you run out of time, please feel free to  
11 finish your comments in a letter or write them on the  
12 comment card. All comments are due no later than 5:00  
13 p.m. on August 16th, 2002. And you can address them  
14 to the SEPA, S-E-P-A, that is, Responsible Official at  
15 17544 Midvale -- Midvale Avenue North, 98133.

16 The meeting is being recorded and verbatim  
17 transcripts will be prepared and will be included in  
18 the Final Environmental Impact Statement. Again, if  
19 you wish to fill out a Title 6 Compliance Statement  
20 the forms are available at the table in the back. And  
21 thank you for your cooperation.

22 We'll now open the public hearing, and we'll  
23 start with the elected official. I guess you're it.  
24 Representative Ruth KaGi.

25 REPRESENTATIVE KAGI: Thank you, and thank you

1 for the opportunity to testify.

2 I am Ruth Kagi. I live at 19553 35th Northeast  
3 in Lake Forest Park, and I have lived in this area all  
4 my life, and used to go down Aurora in the back seat  
5 of my parents car and look at all the trees. And it  
6 is obviously changed a great deal, particularly in the  
7 last couple of decades, and is now a major state  
8 highway that is not safe and that is not efficient in  
9 terms of both people and cars who have to travel on  
10 this highway.

11 I would just like to comment on the consensus  
12 that I think there is in this community and certainly  
13 at the state level on the need to move forward and  
14 improve this highway. It is a major safety hazard.  
15 And because there is so little control on egress and  
16 access and on the traffic flow across lanes, we must  
17 have a raised median. I think the Department of  
18 T-8 Transportation has been clear that they're going to  
19 require a raised median.

20 And I don't have strong feelings about  
21 Alternative A or B. I think that the accommodation  
22 between business and access needs to be worked out  
23 with business and with the citizens, but I think the  
24 need for a raised median is clear and would argue  
25 strongly for inclusion of that.

1 I also think that landscaping is an important  
2 part of this. The -- the street needs to be visually  
3 improved. Not just in terms of adding a lane for  
4 business access and for buses, but to improve the look  
5 of Aurora. We have a great deal to gain by rede --  
6 encouraging redevelopment and economic investment in  
7 this core corridor of the City of Shoreline, and I  
8 think if -- if this project moves forward and is  
9 attractive that it will draw that kind of investment  
10 and benefit us all.

11 I think Aurora has great promise and that the  
12 planners and the city have worked very hard to give us  
13 some ideas of how that promise could be realized, and  
14 I hope we can move forward and will certainly do  
15 everything I can in my position to help that happen.

16 Thank you.

17 MR. DOENNEBRINK: Okay. I was told that a King  
18 County official was here to speak second? Good thing  
19 we only have one. And after her is Rick Sola.

20 MS. BEVINGTON: My name is Ellen Bevington, and  
21 I'm offering this testimony on behalf of King County  
22 Metro Transit, a division of the King County  
23 Department of Transportation. Excuse me.

24 Aurora is an important transit market for the  
25 Route 358 which operates along the length of Aurora

1 through Shoreline and Seattle, is one of the most  
2 productive routes in the metro system, carrying  
3 approximately 7,000 daily riders, 4,000 of which board  
4 and deboard at Shoreline. The Route 358 consistently  
5 ranks in the top five routes in terms of ridership for  
6 us.

7 Currently on Aurora buses operate every ten  
8 minutes during peak hours in the peak direction.  
9 Off-peak service is available every 20 to 30 minutes.  
10 Looking to the future, the Aurora corridor is ripe for  
11 additional transit service investments, and as  
12 financial resources become available it would be our  
13 hope that service levels could be enhanced,  
14 particularly during the midday and on weekends.

15 Over the years we have worked cooperatively with  
16 the City of Shoreline to improve the Aurora corridor  
17 for transit operations. The Aurora Village Transit  
18 Center, which opened for service in 1983, was recently  
19 renovated and reopened for service in expanded and  
20 improved mode in April of this year.

21 Shoreline was one of our first city partners to  
22 work with us to install and operate transit signal  
23 priority which is currently functioning along Aurora.  
24 System testing and acceptance was completed later this  
25 year. Prior to that bus stops had been consolidated

1 to improve traffic flow and transit flow, and a  
2 program to upgrade the remaining stops and add  
3 additional security lighting is under way as we speak.

4 All of these actions incrementally have improved  
5 the operating environment for transit and make it a  
6 more attractive mode choice. But the redevelopment  
7 project for Aurora that is the subject of this hearing  
8 is one of the most significant actions the City of  
9 Shoreline can take to actively promote increased  
10 transit in this corridor, and to ensure that transit  
11 will carry more and more of the increased trips that  
12 are forecast and for which general purpose roadway  
13 capacity will simply not be available in the future.

14 We have been party to the alternatives analysis  
15 and to the extensive community review process that has  
16 brought us to this point. The City of Shoreline and  
17 their elected officials are to be commended for their  
18 forward looking vision for Aurora Avenue that succeeds  
19 in striking a balance between local and regional  
20 needs.

21 We specifically express our support for the  
22 following elements of the proposed project:  
23 Continuous 24-hour business access and transit lanes  
24 consistent with the proposed cross-sections in the  
25 environmental document; and access management measures

1 to address existing and future safety problems;  
2 sidewalk, pedestrian crossings and pedestrian refuges  
3 to create a pedestrian friendly environment; and the  
4 continued application of transit signal priority  
5 throughout this corridor.

6 Either of the proposed build alternatives can  
7 achieve these four basic objectives, but we do believe  
8 that Alternative A will create a more positive  
9 pedestrian environment with opportunities for urban  
10 design inve -- urban design elements that would  
11 enhance the livability of this corridor.

12 Consistent with Resolution 156 in which the  
13 design principles that the Shoreline City Council has  
14 adopted would be applied to Alternative A, there are  
15 flex -- there would be flexibility in areas with  
16 limited right-of-way to adjust the sidewalk width to  
17 minimize or reduce the hardships on adjacent property  
18 owners.

19 We previously demonstrated our support for this  
20 project by committing through interagency agreement  
21 \$500,000 in local county matching funds. We will be  
22 further able to support this project as it moves  
23 forward with additional investments in pedestrian  
24 lighting and shelters as may be agreed upon in the  
25 future.

In closing, we urge the city to move forward with final design and construction of the proposed redevelopment project between 145th and 165th. We would further urge you to begin the necessary environmental studies for similar projects from 165th to the county line. Future King County budgets and appropriation authority permitting, it would be our intent to provide similar levels of financial support for these future projects.

MR. DOENNEBRINK: Thank you.

MS. ROTHMAN: My name is Elizabeth Rothman. Mr. Sola has asked me to read his statement because he's lost his voice.

Richard Sola of P.O. Box 60251, Shoreline, says: It is common knowledge that Mr. Mann and his supporters in the Aurora Merchants Association have refused to honor our democratic process for community and citizen input. For three years they have waged an aggressive campaign to diminish, derail and delay in any way they can the Aurora improvement project. Just in the last few weeks Mr. Mann again threatened further litigation if the city does not comply with their demands.

The City Council, during this three-year period of time, has consistently rejected their demands that

four, I think, rather simple reasons for that is because building Aurora according to the council's 1999 original plan for Aurora will not displace any businesses. And this has always been a concern for a number of our business owners and operators. But as the development is proposed we're going to have a right-of-way that will be adequate for the BAT lane, with a sidewalk, the median and the amenities area.

Secondly, the BAT lane will adequately facilitate a safe exiting of trucks and business traffic in and out of businesses from the right-hand lane without interfering with traffic in the right through-lane, neither north or south. And also transit will no longer be holding up traffic as it operates in the right-hand lane.

Thirdly, the current system makes Aurora one of the most dangerous stretches of state highway that we know of, and our game of Russian Roulette out there in that two-lane left-turn lane, either as a driver or a pedestrian, we can do without.

And the -- fourthly, the -- as far as transit is -- transit is concerned, one of the big concerns is the 200 feet of curb space that's going to be required for buses in and off stopping areas, and they'll no longer have to pull out into moving traffic, and it's

would decimate the Aurora Concept. I commend you for doing so, and encourage you and give you my complete support in your continued efforts to honor and implement our community's vision for the Aurora corridor. I am in full support of Aurora Corridor DEIS Alternative A.

Thank you for your consideration.

MR. DOENNEBRINK: Thank you.

Are there any other officials that I missed?

Okay. We'll start the groups of three now.

So -- and as a reminder, since I just heard a cell phone, please turn off all beepers, pagers, cell phones and so on.

The first group of three, or the next group of three, is Dwight Stevens, Jim Mackey and Walt Hagen.

MR. STEVENS: Thank you very much, Mr. Chairman.

Before I begin I want to thank you for the nice job that was done tonight setting up the other two rooms.

It's very informative and I'm sure that a lot of us found new information, and -- and very nicely done.

Thank you.

My name is Dwight Stevens. I live at 1606 North 197th Place, and I've been a Shoreline resident for the last 41 years.

I'm here to cast my vote for Alternative A. And

just going to be a great improvement.

For those reasons traffic on our major artery will be speeded up, be safer, and aesthetically a great improvement to our city, and promote a better business atmosphere and opportunity.

Thanks very much.

MR. DOENNEBRINK: Okay. Jim Mackey, followed by Walt Hagen, and Myron Philips is after that.

MR. MACKEY: My name is Jim Mackey. I live in the Highlands, Shoreline. I own a small sized company involved in the computer and electrical construction industry. My offices are on First Avenue South near Safeco Field in Seattle.

I'm in favor and strongly urge your continued support of Alternative A for the Aurora Corridor Project. The improvements to the infrastructure will attract redevelopment of this area and make our business community stronger and more dynamic. Most of the Aurora businesses are retail in nature and need to attract --

UNIDENTIFIED: The speaker is off.

UNIDENTIFIED: We lost half of it.

UNIDENTIFIED: We lost sound over here.

UNIDENTIFIED: I think we lost the microphone.

UNIDENTIFIED: Are your mics working up there?



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1 UNIDENTIFIED: It's working now.  
 2 THE COURT REPORTER: They said it's working now.  
 3 MR. MACKEY: Does it go through the whole thing?  
 4 THE COURT REPORTER: I think it's working.  
 5 UNIDENTIFIED: Yours are working?  
 6 COMMISSIONER PIRO: Yeah. Do you want to use  
 7 one of these for recording?  
 8 UNIDENTIFIED: Yeah.  
 9 THE COURT REPORTER: Try talking.  
 10 MR. MACKEY: Hello. Can you hear me? Hopefully  
 11 you all can hear me. Does that work?  
 12 MR. DOENNEBRINK: Why don't you start all over  
 13 again.  
 14 MR. MACKEY: I am strongly in favor and urge  
 15 your continued support of Alternative A of the Aurora  
 16 Corridor Project. The improvements to the  
 17 infrastructure will attract redevelopment of the area  
 18 and make our business community stronger and more  
 19 dynamic -- dynamic. Most of the Aurora businesses are  
 20 retail in nature and need to attract customers to grow  
 21 and be successful. Redevelopment must happen or many  
 22 of these businesses will continue to struggle and the  
 23 likelihood of their success will be in doubt.  
 24 A clear example of the rebuilding -- clear  
 25 example of this is the rebuilding of the grocery store

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1 located in West Minister Square. After many years of  
 2 various grocery stores failing at that site the  
 3 Central Market folks came in and invested heavily in  
 4 the appearance and rebuilt this facility. There was  
 5 no one who could question the immediate and dynamic  
 6 and dramatic change that took place.  
 7 The parking lot has gone from being empty to --  
 8 to being full, and the store is bustling with people  
 9 and is a place that attracts customers from as far  
 10 away as Bellingham. It is a wonderful resource to the  
 11 citizens of Shoreline.  
 12 With our investment in the Aurora corridor  
 13 Alternative A I know the business community will  
 14 experience a similar rebirth. Redevelopment will  
 15 attract new businesses and additional customers. It  
 16 is a win for the business community, it is a win for  
 17 the City of Shoreline, and it is a win for the  
 18 citizens of Shoreline.  
 19 Thank you for your support.  
 20 MR. DOENNEBRINK: Walt Hagen, and Dale Wright  
 21 you're on No. 3 here.  
 22 MR. HAGEN: Hi. I'm Walt Hagen. I'm a 31-year  
 23 resident of Shoreline. Do they -- oh, I'm sorry. I  
 24 thought I heard him say it cut out.  
 25 MR. DOENNEBRINK: Address, too.

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1 MR. HAGEN: 711 North 193rd Street.  
 2 I am a concerned citizen for Shoreline. I'm a  
 3 neighborhood chair in Shoreline. And, gosh, what I  
 4 just heard, you know, I could fill my whole notebook  
 5 full of objections here. I listened to people from  
 6 the county tell us the same numbers that we  
 7 investigated a couple years ago. They couldn't back  
 8 them up then. I doubt if they can now.  
 9 I'm really upset with this project from the  
 10 standpoint -- and our City Council, when we -- every  
 11 time we turn around we're trying to manipulate the  
 12 laws, the ordinances that we agreed to. It's just not  
 13 the right way to do business.  
 14 We look at Aurora here, it's a major state  
 15 highway, I heard somebody say. Yes, it is, indeed.  
 16 T-14 It is a Class 4 highway. It is a built-out highway.  
 17 It does not require a median by Wash DOT's  
 18 administrative code or design code. It's always been  
 19 a major state highway. It was the highway from Canada  
 20 to Mexico, for God's sake, so let's remember just what  
 21 we're talking about here.  
 22 We have three arterials in Shoreline. We have  
 23 I-5, we have 15th Northeast and we have Aurora. And  
 24 we're sad that it's stated that Aurora is one of the  
 25 highest accident stretches of Highway 99 in the state.

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1 Not true. Absolutely not true by Wash DOT's own  
 2 figures. It isn't even classified in the top 71 bad  
 3 intersections. Not in Shoreline. This kind of  
 4 manipulation of the data to get the answer is not the  
 5 way to do business.  
 6 The city has plans for reducing 15th Avenue  
 7 Northeast to two lanes. It's now four lanes. I-5 is  
 8 not likely to get widened too quickly here, and now  
 9 T-16 we're going to curb the capacity of Aurora? Where do  
 10 you think the traffic will go? It isn't going to go  
 11 away. They're not going to ride the transit. Only  
 12 four percent of the people do now. That's not going  
 13 to make up the difference.  
 14 They're going into your neighborhood. You're  
 15 going to have semis and kids on skateboards and kids  
 16 walking to school. That's where the safety issue will  
 17 go. You can improve the safety issues on Aurora by  
 18 building this. Yes, you can. But you're going to  
 19 trade it for safety problems within the neighborhoods  
 20 T-17 and they're going to be much worse than you've had on  
 21 Aurora. Just remember, this is a Class 4 highway.  
 22 It's built out.  
 23 You have to understand why people live in  
 24 Shoreline. They live here because it's a bedroom  
 25 community. It always has been; always will be. This

8 (Pages 26 to 29)

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1 is a land bridge, is what Aurora is, to get from  
2 Seattle to north county or Snohomish county and north.  
3 It will always be a major highway. We cannot turn it  
4 into Main Street USA for Shoreline for a few people  
5 and --  
6 MR. DOENNEBRINK: Wrap it up, please.  
7 MR. HAGEN: -- still increase the capacity. And  
8 that's where we have to keep the traffic. It has to  
9 be on Aurora, not in my neighborhood, please.  
10 Thank you.  
11 MR. DOENNEBRINK: Thank you. Okay. Myron  
12 Philips.  
13 (Applause.)  
14 MR. DOENNEBRINK: Please refrain from the  
15 applause.  
16 Myron Philips, Dale Wright, and then Gretchen  
17 Atkinson.  
18 MR. PHILIPS: My name is Myron Philips. I live  
19 at 18805 86th Place West in Edmonds, Washington; had a  
20 business on Aurora for 35 years.  
21 I'd like to clear one thing right now. Dan Mann  
22 is a good American. Dan Mann speaks up for democracy  
23 more than anybody perhaps in this room. So for  
24 someone to come up here and impugn the man -- a name of  
25 a man who is not even here tonight who doesn't deserve

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1 it, I stand up in his favor. So I just wanted to  
2 clarify that.  
3 UNIDENTIFIED: Amen to that.  
4 UNIDENTIFIED: Here, here.  
5 UNIDENTIFIED: Here, here.  
6 (Applause.)  
7 MR. PHILIPS: A NEPA Environmental Impact  
8 Statement should be completed on the entire corridor  
9 project. Segmentation of this project is  
10 inappropriate because environmental issues are only  
11 discussed for one mile of a three-mile project.  
12 According to federal rules it is impossible to know  
13 the environmental ramifications of the rest of the  
14 project. Once the Environmental Impact Statement is  
15 done the entire pro -- over the entire project, the  
16 segmentation can occur.  
17 Also, segmenting the project into Phase 1 does  
18 not follow the rules of the logical termini. Logical  
19 termini, by definition, are intersecting roadways of  
20 major traffic generation. North 145th Street is  
21 impacted by major east/west traffic at this time,  
22 whether we speak of rush hour traffic or not.  
23 Increasing this traffic by a projected 30 to 40  
24 percent, as in the EIS manual, by 2020 may leave this  
25 roadway as less than a major traffic generator.

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1 North 165th, by contrast, is not now, nor will  
2 ever be, a major generator of traffic. It lacks size.  
3 It lacks capacity. It dead ends one and a half blocks  
4 to the east and has no sidewalks. A significant  
5 safety hazard exists for residents on 165th and  
6 adjacent side streets. By making Aurora safer we may  
7 well make North 165th very unsafe. The residents of  
8 North 165th and adjacent streets should be outraged by  
9 this lack of consideration for very unsafe conditions.  
10 Phase 1 differs greatly from Phase 2. Phase 1  
11 has an existing right-of-way footprint which is much,  
12 much wider than Phase 2. There will be many more  
13 business takes in Phase 2. The City of Shoreline  
14 plans to develop the center of its city and calls this  
15 a subarea plan. This will also affect the core  
16 business in Phase 2.  
17 The plan to perform an environmental study and  
18 to complete Phase 1 is a ploy by the City of Shoreline  
19 to complete the easiest, less controversial segment  
20 first. Therefore they think that we will have set the  
21 pattern for Phase 2. There is great controversy,  
22 distrust and uncertainty with the city's Aurora  
23 corridor plan.  
24 It is for this reason that the Shoreline  
25 Merchants Association and the Concerned Citizens of

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1 Shoreline stress the need for and request the City of  
2 Shoreline be required to complete a full Environmental  
3 Impact Statement on the Aurora Corridor Project from  
4 North 155th Street to 205th Street.  
5 Thank you.  
6 MR. DOENNEBRINK: Thank you.  
7 Dale Wright. And up third is Connie King.  
8 MR. WRIGHT: Dale Wright, 18546 Burke North.  
9 I'm officially representing the Citizens for a Safer  
10 Aurora. Mr. Chairman, I assume that entitles me to  
11 five minutes.  
12 MR. DOENNEBRINK: That's correct.  
13 MR. WRIGHT: In reviewing the Draft  
14 Environmental Impact Statement perhaps we should  
15 refresh our memories and review a few significant  
16 facts. The community of Shoreline decided in August  
17 of 1999 what we wanted the Aurora corridor to become.  
18 This decision was the result of an extensive, open,  
19 public, legitimate process in which everyone had an  
20 equal opportunity in which to express their views and  
21 concerns.  
22 The views of the Aurora businesses were heard  
23 loud and clear and were clearly understood. Some of  
24 their suggestions were accepted and became a part of  
25 the consensus. Some of their suggestions were

9 (Pages 30 to 33)

rejected because they were not compatible with the goals and objectives of the corridor.

This is the way decisions are supposed to be made in our democratic society. The resultant consensus, called the Aurora Concept, was adopted unanimously by the City Council in August of 1999. I will briefly review the major elements that the community demanded for Aurora.

The community demanded that Aurora become significantly safer for car and pedestrian traffic. We want to take advantage of the current techniques of traffic management and access management that have been proven successful. The state of Georgia, in studying roads similar to Aurora, have found that their roads with raised medians have 45 percent lower vehicle accident rates, 43 percent lower injury rates, and 78 percent lower pedestrian fatality rates than those roads with two-way left-turn lanes. It is reasonable to expect that we could achieve a similar reduction by converting from our two-way left-turn lanes to raised medians.

The Aurora accidents in Shoreline are estimated to cost societal costs of approximately \$10 million per year. If we were to reduce our accidents by 40 percent, we would reduce our societal costs by \$4

will achieve this objective.

The community demanded that Aurora become pedestrian friendly. To achieve this it is the consensus of the community that a four-foot amenity zone and eight-foot sidewalks are required. We by no means consider this extravagant. Alternative A will achieve this objective. The community demanded that we take advantage of this once-in-a-lifetime opportunity to have the Aurora corridor become a great asset for the City of Shoreline instead of a detriment. This is an investment that will benefit us and future generations to come. Alternative A will achieve this objective.

Subsequent to August of 1999 the opponents have on -- have made ongoing demands that would decimate the Aurora Concept to such a degree that it would no longer be able to achieve its goals and objectives.

In contrast, we, the Citizens for a Safer Aurora, enthusiastically support Alternative A as it would enable the city --

MR. DOENNEBRINK: Please wrap up.

MR. WRIGHT: -- to achieve the community's goals and objectives for the Aurora corridor.

Thank you.

MR. DOENNEBRINK: Thank you.

million per year. Alternative A will achieve this objective.

The community demanded that the Aurora corridor be attractive so as to enhance the quality of life and attract consumers to Shoreline rather than drive them away. Alternative A will achieve this objective. The community demanded that the Aurora corridor have an infrastructure and business environment that permits and encourages our current businesses to prosper and grow, and one that encourages new business investments. We want the Aurora corridor to achieve its economic potential, which is essential for our city's financial well-being.

The opponents claim the raised medians will be a disaster for their businesses. The position is not supported by the facts. The state of Texas found through an extensive study that converting from two-way left-turn lanes to raised medians economically benefits the adjacent business community. Their sales increased, their customers per day increased, and their property values increased.

Based on these facts we believe that our Aurora business community will also benefit from the Aurora reconfiguration as stipulated in the Aurora Concept. We view this as a pro-business plan. Alternative A

Gretchen Atkinson. Up third is Bonnie Mackey.

MS. ATKINSON: I'm Gretchen Atkinson. I've been a resident of Shoreline for a number of years. My address is 2148 North 183rd Place.

I am in favor of Alternative A. I think it is a good thing to have the wider sidewalks. I do a lot of walking for exercise and feel much safer when the sidewalks are a little bit wider and people can pass easily, and when there is a buffer zone between myself and the traffic, in case, in bad weather, a car goes errant, trees, or at least I'd have a chance of -- a little bit more of a chance of getting out of their way. So I am in favor of that.

And I've heard many comments about the median being destructive to businesses. I've done some research on that, and there were two particular studies done and presented at the Access Management Conference in Portland in the year -- August of 2000. Both of those proved, according to their study, that the raised medians did not damage the businesses; that there was some impact during construction, as there will be with any construction, but that the medians ended up not causing any hardship on businesses.

I know my husband and I often go to Black Angus out in Lynnwood, and there is a block-long divided

1 median there. We don't have any problem getting to  
2 it, as do hundreds of other people, because they're  
3 busy all the time. Many other places have raised  
4 medians and it has never stopped their customers from  
5 getting to them.

6 The big companies such as Starbucks and  
7 Walgreen's do extensive marketing and research  
8 studies, and the raised medians do not bother them.  
9 In fact, they will even go into one-way streets. And  
10 there are many one-way streets in downtown Seattle.  
11 The big companies are there. People still find them.  
12 So I hope that the city will progress with  
13 Alternative A.

14 Thank you.

15 MR. DOENNEBRINK: Thank you.

16 Connie King, and third is Anthony Poland.

17 MS. KING: My name is Connie King. I've lived  
18 here for 42 years. My address is 217 Northwest 177 in  
19 Shoreline.

20 A few years ago while I was on the council I  
21 served on the King County Economic Development Council  
22 with Mayor Shirley Thompson of Sea-Tac, and last  
23 September she wrote me this letter that I'd like to  
24 read some parts of. We're talking about Highway 99  
25 and their -- their job in Sea-Tac.

1 This project has proven to be critical in  
2 enhancing the image of our city. It has benefited our  
3 business climate and has been instrumental in  
4 improving traffic flow and safety. Without hesitation  
5 I can recommend that Shoreline take similar steps to  
6 improve Highway 99.

7 She goes on: Some advantages now enjoyed by the  
8 adjacent property owners and businesses include  
9 pedestrian friendly amenities such as major sidewalks  
10 and landscaping to attract walk-in business and  
11 enhance the attractiveness of their businesses and  
12 properties. Other features include improved vehicle  
13 access due to permanent driveway installations that  
14 specifically call out a business location. This has  
15 been an important amenity in comparison to the  
16 hodgepodge of business accesses that previously  
17 existed.

18 Also included are underground installations for  
19 electrical power to the businesses that greatly reduce  
20 the visual clutter of their street frontages. The  
21 final enhancement, I would note, was major  
22 landscaping, both of the sidewalks and of the medians  
23 that were constructed as part of the project. Then  
24 she mentions the storm water and -- and  
25 undergrounding.

1 She finishes saying: In general, I feel  
2 confident in stating all of the businesses in the city  
3 of Sea-Tac that operate adjacent to the improved  
4 Highway 99 now agree that these improvements were long  
5 overdue and have -- and have enhanced business  
6 opportunities.

7 Thank you.

8 COMMISSIOENR PIRO: Thank you.

9 MR. DOENNEBRINK: Bonnie Mackey, and third is  
10 Ken Cottingham.

11 MS. MACKEY: Bonnie Mackey. I live in the  
12 Highlands, and we've -- my husband and I have been in  
13 the north end our entire married lives. Our children  
14 went to Einstein and Shorewood High School.

15 What is it that a great street should do? First  
16 and foremost a great street should help make a  
17 community. A great street should be a most desirable  
18 place to be, to spend time, to live, to play, to work,  
19 all the while markedly contributing to what a city  
20 should be. A great street is physically comfortable  
21 and safe. It might be cooler and shadier on a hot  
22 summer day. And you shouldn't have to worry about  
23 being hit by a car or truck.

24 The best streets encourage participation. The  
25 best streets are those that can be remembered. They

1 leave strong, long, continuing, positive impressions.  
2 They are memorable.

3 Finally, a truly great street is one that is  
4 representative. It is the epitome of a type. It can  
5 stand for others. It is the best. To achieve that  
6 status it will have to have been put together  
7 artfully. Plan A meets all of the criteria for a  
8 great street.

9 The City of Longview, Washington decided to  
10 invest foresight and patience and spend its time on  
11 landscaping amenities rather than yielding to  
12 proponents of a baron right-of-way. This medium-sized  
13 city planted 150,000 trees on the public right-of-way.  
14 Four-inch caliper trees costing \$300 over a five-year  
15 period which brought them up to a point that they're  
16 basically self-sustaining. The landscaping more than  
17 paid for itself in increased property values.  
18 Homeowner property values increased between \$1,000 and  
19 \$5,000 just because the trees were planted in front of  
20 their homes on the public right-of-way.

21 Our community will gain a grandeur and a  
22 presence when landscaped. Landscaping in front of one  
23 business is fine, but the real impact comes when an  
24 entire district is landscaped. I support and endorse  
25 plan A.

1 Thank you.

2 MR. DOENNEBRINK: Thank you.

3 Anthony Poland. After Ken is Brian McCulloch.

4 MR. POLAND: Good evening. Anthony Poland from  
5 the Richmond lowlands, formerly known as Richmond  
6 Beach here within our city.

7 I would like to start by saying, first of all --

8 MR. DOENNEBRINK: Can you mention your address?

9 MR. POLAND: No. Thank you. I'd like to retain  
10 my address. It's a matter of privacy for me.

11 I'd like to start by saying, first of all, that

12 I have no vested interest in Shoreline other than my  
13 postage stamp sized home down in Richmond Beach.

14 Thusly I have nothing to gain by the Aurora Corridor  
15 Project at all.

16 First thing I'd like to say is that this meeting  
17 being held in August itself is highly inappropriate.

18 T-24 I think it really lessens the amount of feedback that  
19 you're going to get from the public and should have  
20 been scheduled for a time when folks aren't off -- off  
21 work and on vacation.

22 The EIS, which is what I understand we're  
23 supposed to be discussing here tonight, seems to be  
24 not getting a whole lot of talk. The one thing I  
25 would like to say is that the EIS itself should have

1 been done on the entire corridor from 205th all the  
2 way down to 145th and it is not. Thusly, as far as I  
3 can see, it's -- it's not a lawful document. You can  
4 segment the construction phase but you cannot segment  
5 the environmental phase.

6 The logical termini also at 165th also seems to  
7 be ridiculous and almost an admission by the city that  
8 we will have no increased traffic flow at that  
9 intersection. And indeed we're only going to get 20  
10 percent more traffic flow out of this new  
11 configuration either way it goes, with Option A or B.

12 T-26 The value engineering, from what I've seen, has  
13 either not been done or totally ignored. The federal  
14 funds coming in do require us to have a BAT lane,  
15 T-27 unfortunately. It does not say that that needs to be  
16 restrictive and cannot be a carpool lane as well. But  
17 unfortunately the City of Shoreline has changed the  
18 terminology, which government so often does. It has  
19 changed the word BAT, which the federal government  
20 understands to mean Bicycle And Transit, well, here in  
21 Shoreline we've changed that to mean Business Access  
22 and Transit. And I don't think that's going to go  
23 over too well with the feds once they catch wind of  
24 it. Phase 2 and 3 should also require a full-blown  
25 federal NEPA EIS since the ramifications of those two

1 phases are going to be tremendously different than  
2 this phase.

3 Medians? Any of us who drive, and I believe  
4 most of us do, know that these medians, when they are  
5 put into any roadway or Boulevard, do force traffic  
6 T-28 back into the neighborhoods. When you're going along  
7 and you're looking at trying to find a business on the  
8 left, you're going to end up going past it and cutting  
9 back, do a U-turn back onto the main Boulevard, or  
10 you're going to go a block further into the  
11 neighborhood, cut back down the side street two blocks  
12 and hit it the second time when you go by it. That's  
13 the way I do it. That's just human nature and that's  
14 not being addressed here at all.

15 And another thing that -- that I really don't  
16 feel is fair to the folks in Shoreline is that we're  
17 T-29 building a bus lane for Metro and that's really all  
18 we're doing. We're gaining nothing in safety. And  
19 even the bus company whose speaker came up here before  
20 and says even in peak time we only get ten --

21 COMMISSIONER DOENNEBRINK: Please wrap it up.

22 MR. POLAND: -- ten minutes between each bus and  
23 20 to 30 minutes in the off hours. So we don't need  
24 to build a bus lane. We need traffic flow. The --

25 MR. DOENNEBRINK: Please wrap it up.

1 MR. POLAND: The SMA, Shoreline Merchants  
2 Association, do fine work. These folks have a much  
3 better alternate -- alternative to Plans A or B, and  
4 Mr. Mann does not run this organization. It is a  
5 group of individuals, and they're only fighting for  
6 your future and fairness and to try and stay off the  
7 endangered species list, basically.

8 And that median up in Black Angus in Lynnwood  
9 does require you to drive into the neighborhood to  
10 access that Black Angus. So the previous testimony  
11 was incorrect.

12 Thank you very much.

13 MR. DOENNEBRINK: Very Good.

14 Ken, you're next. Rick Stephens is third.

15 MR. COTTINGHAM: Tell me when you start the  
16 timer, but before you start it, my 28-minute  
17 dissertation has been cut down to three? In Toast  
18 Masters we gave it three. So I'll do it. I'll just  
19 hit the highlights.

20 I've done 40 years of transportation and traffic  
21 engineering throughout the states of Oregon,  
22 Washington, Idaho, Montana, Alaska, Illinois and  
23 others. I've live at 350 Northwest 175th Street for  
24 nearly 40 years. I'm not a business owner on Aurora,  
25 but when I saw the plans starting to gel I said,

1 "What's happening? How come Chuck Olson's moved the  
2 curb out into the street?" No overall plan. There is  
3 no overall plan in Shoreline. It's hit or miss, one  
4 thing or the other. Aurora is one of them.

5 What's wrong with the EIS on Aurora? Well, they  
6 have Alternates A and B. What about C, the one that I  
7 sent in, and the one many people here sent in, called  
8 **T-30** build within the right-of-way, build seven lanes, keep  
9 the two-way left-turn lane, build five- to eight-foot  
10 sidewalks and stay within the right-of-way? Not  
11 considered in this volume. Not considered in the 52  
12 pages additional that I got today. Never even thought  
13 it was a good plan.

14 It's a plan I proposed. I proposed it to the  
15 Shoreline Merchants Association. They adopted it.  
16 Why? They adopted it because they found from me that  
17 **T-31** traffic capacity and safety would be the same for  
18 Alternates A, B and the C, the one that stays within  
19 the right-of-way.

20 How can traffic capacity and safety be the same,  
21 **T-32** Ken? Because a BAT lane doesn't improve capacity. A  
22 BAT lane doesn't improve safety. A pedestrian walking  
23 across now walks across five lanes. In the new plan  
24 **T-33** it will be seven lanes. How can that improve safety  
25 of a pedestrian? It can't. How many pedestrian

1 accidents have we had in the last recorded '99 and  
2 2000? Six between intersections. Six at  
3 **T-34** intersections. Tell me how the plan is going to  
4 improve capacity and safety.

5 In here is an accident rate of 8.3. That's per  
6 **T-35** million vehicle miles of travel. When I calculate it,  
7 and I've done it for many, many years, it's 6.1. How  
8 can we be so far different on accident rates? Have  
9 they gone up in the late years? No. According to  
10 WSDOT -- we are Washington state -- accidents are  
11 decreasing every year on Aurora including the latest  
12 recorded time. This document is right here. It  
13 doesn't quote that. Something's wrong.

14 My three minutes is probably coming close to an  
15 end. My 28-minute dissertation will be handed to you  
16 as additional to what I'm doing here, but these are  
17 the facts and figures. None of you have spent nearly  
18 the hundred hours I've spent to look at the facts and  
19 figures about capacity and safety. You can't afford  
20 to. You rely on the people who design the roads for  
21 you.

22 Believe me, capacity and safety can be done with  
23 A, B or C, and raised medians and flush medians you  
24 cannot find any accident statistics anywhere. Nobody  
25 knows. Absolutely nobody knows. They were invented

1 in the west, the flush median, the two-way left-turn  
2 lane. We have the Oregon summary of all two-way  
3 left-turn lane and raised medians in the United States  
4 and the net answer of that is raised medians do not  
5 make it safer. They focus left turns into left-turn  
6 lanes --

7 MR. DOENNEBRINK: Please wrap up.

8 MR. COTTINGHAM: -- and increase the flow at an  
9 intersection. Pretty much it.

10 I hope you look at it as thoroughly as I have  
11 and ask questions about accidents and safety because  
12 it doesn't improve, any more than what we have today.

13 MR. DOENNEBRINK: Thank you.

14 Brian. And Diana Stephens follows Rick.

15 MR. McCULLOGH: Good evening. My name is Brian  
16 McCulloch and I'm a resident of Shoreline. I moved  
17 here in 1986 to 633 Northwest 180th Street. And I  
18 drive Aurora Avenue, and as we call it, Highway 99,  
19 every day to my office in Lynnwood.

20 I became interested in this whole project when I  
21 was invited to a meeting and asked the question of  
22 City of Shoreline's former Public Works Director. I  
23 asked him how wide Highway 99, the road I drive every  
24 morning, now that it's been done, how wide is it? And  
25 what he told me was he didn't know. A couple weeks

1 later he still didn't know, at a meeting just like  
2 this, with far fewer people. And if you look at some  
3 of the maps, we've got a sidewalk going through the  
4 roof of Arby's and the manager there didn't know about  
5 that.

6 The cost of the project is extravagant. Earlier  
7 we heard from another witness that it's not  
8 extravagant. I think that's guiding the lily when  
9 the projected cost is a hundred million dollars, and  
10 the road I drive in -- on Highway 99 every morning and  
11 every afternoon costs \$21 million for three miles  
12 each. We can't afford that. Not while we're in war.

13 We've heard all these safety statistics and the  
14 so-called suicide lane. If it's a suicide lane on  
15 Aurora, then why is the City of Shoreline proposing  
16 **T-36** doing the same thing up on 15th Northeast and  
17 collapsing four lanes into two lanes of traffic with,  
18 quote, a suicide lane in the middle?

19 The environmental impact on citizens of  
20 Shoreline is a lot greater than I think this study  
21 talks about. We're all going to have to go farther to  
22 buy tires. Les Schwab isn't going to be in town  
23 anymore. The reason that Aurora looks so bad, in  
24 part, is because of the lack of a decision, the lack  
25 of getting it done, and the fact that business owners

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1 and property owners see how they can be pushed around  
2 by this city. We've got to stop that.

3 The quality of life in Shoreline is going to be  
4 impacted when we lose our family businesses because  
5 the only businesses that will be left to -- that can  
6 survive in this new environment that you're all  
7 planning are the large businesses. They're the only  
8 ones that can wait it out. We heard about Walgreen's,  
9 for example. What's next? Wal-Mart?

10 Finally, we -- we've talked -- we haven't heard  
11 anything about east/west traffic and I'm very  
12 concerned about that. That's going to impact the  
13 environment, too. If you've got cars idling for  
14 minutes and minutes trying to get through a change of  
15 lights, it's going to add to the noise and the  
16 pollution in our city. And there's nothing in the EIS  
17 that directly deals with that. So I think we've got  
18 to deal with a few other issues that haven't been  
19 dealt with here.

20 I'd like to bring up something that isn't  
21 directly impacted, but I think you all should take a  
22 look at the map in there in terms of water detention,  
23 what's planned for our city, and we're going to lose  
24 more park land. I'm told it's not part of this, but  
25 it's certainly going to impact our environment so

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1 there will be more of these meetings in the future.  
2 Thank you.

3 MR. DOENNEBRINK: Thank you.

4 Okay. Rick Stephens. And Mary Ann Helferty, I  
5 think, will be third.

6 MR. STEPHENS: Okay. I'm Rick Stephens, 18005  
7 Aurora Avenue North. I am a business owner on Aurora.  
8 My family has been in business on Aurora for 40 years.  
9 We own one of the biggest parcels of land on Aurora.

10 My comments addressed in the EIS were never  
11 answered in the document. I requested that the EIS  
12 cover all three miles of SR 99 in Shoreline. It's  
13 improper to do just one mile because the whole project  
14 will affect everything in Shoreline. It will affect  
15 my business. It will affect my customers.

16 We also must match up with Seattle and Edmonds  
17 on each end. This hasn't been done yet. What type of  
18 traffic problems are we going to create when we match  
19 up with Edmonds, when we match up with -- with  
20 Seattle? If Seattle isn't planning to do anything  
21 right away, what is our contingencies to keep from  
22 bottlenecking and creating traffic worse?

23 It doesn't address impacts past 50 feet to the  
24 east or to the west of Aurora. Well, there's going to  
25 be huge impacts to the neighborhoods and the

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1 communities, the schools, and there's no -- no action  
2 taken in that to address those people. We don't want  
3 business traffic and trucks being pushed through the  
4 neighborhoods. The EIS needs to answer those  
5 questions. It has not.

6 It does not address business impacts.

7 Thirty-six percent of the businesses polled in  
8 Shoreline on Aurora, these are Aurora businesses, feel  
9 that this project will make them have to move.  
10 Eighty-five percent of those businesses will not  
11 relocate in Shoreline.

12 Property acquisition would remove the taxable  
13 property from the city's tax base, thus impacting  
14 property tax collections. Property acquisition would  
15 also displace an estimated 25 businesses,  
16 approximately 227 employees. These 25 businesses  
17 generate an estimated 14 million in retail sales  
18 annually. That's from the city's own documents. And  
19 then they say there's no impact. These things need to  
20 be answered.

21 They say that they've had these open discussions  
22 with the businesses. I attended a meeting on July  
23 8th, 1999. I waited my turn. I spoke. And the  
24 people at the CATF stood up and says, well, your  
25 opinion doesn't matter. Well, my opinion does. I'm

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1 here. I've been a long-time business person. My  
2 family is here. I employ a bunch of family workers  
3 with living wages, with health insurance, to support  
4 their families. And then I employ many young people  
5 who are coming out of the schools or are still in  
6 their last year of their school and we train them and  
7 we teach them and help them become productive in our  
8 society.

9 There's many things --

10 COMMISSIONER DOENNEBRINK: Please wrap it up.

11 MR. McCULLOUGH: -- many things that we need to  
12 address that hasn't been addressed in the EIS. It's  
13 an unfinished document and the city needs to do a  
14 better job.

15 MR. DOENNEBRINK: Thank you.

16 Diana Stephens. Mary Ann is after that, and  
17 then Tim -- Tim Crawford after that.

18 MS. STEPHENS: Okay. I am Diana Stephens.  
19 18005 Aurora Avenue North. And I am actually going to  
20 speak for the Shoreline Merchants Association.

21 MR. DOENNEBRINK: Okay.

22 MS. STEPHENS: We are addressing what's in the  
23 Draft Environmental Impact Statement. Shoreline  
24 Merchants Association does not endorse any of the  
25 study altern -- alternatives as they do not address

14 (Pages 50 to 53)

1 the needs of Shoreline's existing businesses.  
2 Everybody wants to talk about future businesses. What  
3 about the ones that are here right now? We are  
4 addressing the Draft Environmental Impact Statement  
5 and the various inconsistencies we have located in it.  
6 We are hitting the highlights as Ken Cottingham  
7 stated.

8 To begin with, we feel that CH2M Hill has a  
9 conflict of interest. Not only are they the design  
10 company for this project, they also performed all of  
11 the discipline reports which were used to create the  
12 Draft Environmental Impact Statement, which CH2M Hill  
13 then prepared as well. This company has already been  
14 paid approximately \$5 million for the design for one  
15 mile of roadway, and it is in their best interest to  
16 create a document that makes the entire project look  
17 rosy.

18 If you read this -- if you read this document  
19 you will see very little mention made regarding  
20 impacts, and it downplays the amount of money that  
21 will be lost in property and sales taxes from business  
22 property takings. I want to read to you in the Wash  
23 DOT document a primer for local agencies on access  
24 management in Washington state. It says, under Public  
25 Involvement and Education, the backbone of almost

1 every access management effort is public involvement.  
2 Property owners consider many access management  
3 applications a threat to them. They are more likely  
4 to cooperate if they are approached in an early stage  
5 of the process. They need to be invited to help solve  
6 a problem, not approve a proposal that agency staff  
7 has already developed.

8 That didn't happen in this case. The CATF was  
9 given three alternatives to choose from. They weren't  
10 allowed to design their own, and in my opinion they  
11 had to choose from the lesser of three evils.

12 As well as the business owners have not been  
13 involved. Our concerns have been brushed aside as if  
14 we are irrelevant, which understandably makes us  
15 frustrated and angry at being treated in such a  
16 cavalier manner by our city.

17 I want to list a few misstatements and  
18 omissions in this document. For instance, Page 1-3  
19 states installation of medians to mitigate turning,  
20 weaving and crossing conflicts, and then doesn't even  
21 mention that this could include nonrestrictive,  
22 existing or planned medians such as the two-way  
23 left-turn lane that we already have. It also neglects  
24 to mention that a speed limit of 30 to 35 miles per  
25 hour for a Class 4 highway which Aurora Avenue is.

1 On Page 313 -- if I can flip through all the  
2 pages in here -- it says without improvements to major  
3 signalized intersections level of service will  
4 continue to degrade below acceptable levels, and  
5 drivers may drive into neighborhoods to avoid what  
6 will become choke points. Two locations where this  
7 may be most prevalent is at North 165th and North  
8 152nd Street.

9 However, by putting traffic signals at these  
10 locations the city is going to encourage traffic to go  
11 to those intersections. Every study I have read has  
12 said that when there's traffic signals, people will  
13 drive through whatever neighborhoods it takes to get  
14 there. So by adding two more signals you're adding  
15 more cut-through traffic through our neighborhoods  
16 which is unacceptable.

17 Page 351 states there are 52 businesses on  
18 Aurora between 145th and 165th. That really bothered  
19 me because there's almost a hundred. You can go count  
20 them yourself, but it's not 52, and yet that statement  
21 is in this document.

22 Page 2-3 states the project limits, the northern  
23 terminus include the intersection of North 165th  
24 Street because the vicinity of this intersection is  
25 identified by Wash DOT as a high accident location.

1 However, Wash DOT's own report listing the top 71 high  
2 accident corridors for the entire state doesn't list  
3 Shoreline. Not even once. Repeatedly the Draft  
4 Environmental Impact Statement states how unsafe  
5 Aurora Avenue is in our city, but their own reports do  
6 not even back up these statements.

7 One thing I just wanted to mention where we go  
8 on and on about safety, everything's about safety, if  
9 you read on any of these documents, safety is supposed  
10 to be the top priority, and yet when I got to the  
11 goals and the objectives of this project it doesn't  
12 mention safety once. The first thing it mentions are  
13 to improve the economic development potential, provide  
14 enhancement of livability for communities adjacent to  
15 the corridor, and to be in agreement with the city's  
16 comp plan for land use decisions. Where is safety?  
17 If that's supposed to be a goal and objective, why  
18 isn't it listed here in the Draft EIS?

19 And I'd like to close with -- if I get all my  
20 cards in order again -- on Page 3-1 it lists where the  
21 discipline reports are available. FHWA office in  
22 Olympia, the Wash DOT office on Dayton and the  
23 Shoreline City Clerk's office. These locations are  
24 all open from 9:00 a.m. to 5:00 p.m., meaning  
25 that most people don't have access to these reports



7-54  
1 since most people work during these hours. These  
2 CONT. reports should have been available at the library,  
3 which the Draft Environmental Impact Statement is  
4 available at the library as in -- as -- in accordance  
5 with the Washington Administrative Code. Better yet,  
6 they should have been included in the Draft EIS so  
7 everybody could look at them.  
8 In my opinion this document is incomplete as it  
9 -55 only covers one mile instead of the three miles on  
10 Aurora Avenue, it has too many mis --  
11 misrepresentations and omissions in the document, and  
12 should not be considered a valid environmental  
13 document for this project.  
14 Thank you.  
15 MR. DOENNEBRINK: Thank you.  
16 Mary Ann Helferty and Tim Crawford and then  
17 Patti Crawford.  
18 MS. HELFERTY: Good evening. I'm Mary Ann  
19 Helferty and I'm a resident of Shoreline. I live at  
20 312 North 160th Place.  
21 -56 I want to speak in support of Alternative A. I  
22 have four reasons why I think that this is an  
23 important step for my city to take to improve its  
24 livability and the health and safety of its residents  
25 and its business climate. These reasons are, first

1 off, safety for both pedestrians and for the people  
2 who live near the street and drive to the grocery, who  
3 drive to get their laundry, and who drive to shop  
4 along it.  
5 The second reason is for the increased transit  
6 access on Aurora. I'm a bus pass owner. I take the  
7 bus in support of environmental goals, in support of a  
8 better quality of life for myself, and I think that it  
9 will make a big difference to have the bus  
10 improvements that have been described in the document  
11 and in the plan.  
12 The third reason is that I feel it's really  
13 important to improve the business climate of Aurora so  
14 that we can have a place that's more of a gathering  
15 point for our community, a place where people want to  
16 be. I really support livable, walkable communities,  
17 and I'd like to see the pedestrian buffers, wider  
18 sidewalks, be part of my neighborhood.  
19 Then the last reason that I wanted to speak in  
20 support of it is I live within a half mile of Aurora,  
21 and I am convinced that because traffic on Aurora gets  
22 backed up, and because transit is not as strong as an  
23 option as it could be, people drive on Greenwood  
24 instead of driving on Aurora. And I think that some  
25 of the arguments that have been made about diverting

1 traffic into the neighborhoods if we make this change  
2 don't sound true to me, and I think it's my  
3 perspective that we would have a safer neighborhood  
4 environment with the improved throughput of cars on  
5 Aurora, and that would keep people on the major state  
6 highway rather than in my neighborhood.  
7 So in conclusion, I'd just like to encourage the  
8 draft -- the city to support and -- this proposal to  
9 support Alternative A. I think it's important to  
10 increase pedestrian safety. It's important to  
11 increase vehicular safety on Aurora. It's important  
12 to increase the business climate. It's important to  
13 increase safety in the surrounding neighborhood. And  
14 it's important that we have a much better transit  
15 system that supports people using the bus system in  
16 our communities.  
17 Thank you.  
18 MR. DOENNEBRINK: Thank you.  
19 Patti Crawford. And third would be Ginger  
20 Botham. We're ready.  
21 MS. CRAWFORD: Start? Oh. My name is Patti  
22 Crawford. 2326 North 155th Street, and I represent  
23 Twin Ponds Fish Friends.  
24 First of all, I would like to just touch on,  
25 initially, the comments about Dan Mann. I think that

1 there's a real problem when people put down somebody  
2 for being in the middle of public process. Dan Mann  
3 is utilizing the public process to say his feelings  
4 and the other merchants' feelings and they're being  
5 faulted for that, and I think it's simply because  
6 they're holding up development.  
7 I've seen it happen in other situations, the  
8 same techniques used. Dan Mann, and everyone with an  
9 alternative view to this project, have legal standing  
10 and have a right to say something about it. It's in  
11 our constitution. We can bring complaints to our  
12 government.  
13 The second thing that I would like to say is the  
14 EIS only dealing with a part of Aurora is not  
15 -57 effective for storm water. You have to be analyzing  
16 cumulative effects. How can you analyze cumulative  
17 effects when you're parting the street out? You'll  
18 never know the cumulative effects of your storm water  
19 runoff unless you do an EIS that's together.  
20 I heard quite a few things tonight that worries  
21 me. I think a lot of these citizens have blinders on.  
22 I think there's a lot of real good reasons for wanting  
23 to improve the look and achieve economic potential and  
24 it would be a great ac -- asset and investment and  
25 wider sidewalks being a good thing, making -- helping

1 making the community.

2 When you get down to the practicalities of it,  
3 you're adding a lot of impervious surface in the  
4 middle of two water sheds. So your wider sidewalks  
5 and everything come as a cost. And you're putting  
6 blinders on to say you want all these amenities and  
7 you're not going to handle the impacts that are going  
8 to pour off of them. That's just really short sighted  
9 to be looking at.

10 And I have an example of that. Walgreen's at  
11 145th in Aurora. All the extra permeable surfaces  
12 they added once Joanne Fabrics got out of there, do  
13 you know what the creek got for that? They got that  
14 pretty little Welcome to Shoreline sign in front.  
15 That didn't do anything for the creek that had to  
16 accept those extra storm flows from that development.  
17 And I don't want to see this project doing the same  
18 thing.

19 I don't see any decent storm water analysis  
20 going on. Sur -- pro -- A and B, they say they're  
21 going to have detention for all the newly created  
22 impervious surfaces. That's not all the impervious  
23 surfaces out there on Aurora. And if they're only  
24 going to detain what they add, how can they say  
25 they're improving the environment?

1 techniques.

2 There have been classes available for our city  
3 to be going and learning these cutting edge  
4 techniques. We're not incorporating any of them.  
5 They say given the wide range of practices available,  
6 every site should at least incorporate several of  
7 these. I looked at your storm water plan. You don't  
8 have any high tech anything. The only thing that you  
9 are saying that you're going to filter are oil  
10 residues. What other fluids drop off of a car?  
11 Gasoline? Antifreeze? Your oil water separator that  
12 is the do-all/catchall of your storm water plan isn't  
13 going to touch these things.

14 Another thing that could be incorporated, you've  
15 got a four-foot amenity strip. Why aren't those  
16 impermeable pavers? Why do we have this massive  
17 runoff coming off of Aurora? The whole point of storm  
18 water management and the theory of it now is why  
19 collect it. If you're going to collect these large  
20 amounts of storm water, then you're going to have to  
21 figure out what to do with them, and you need to have  
22 some better science incorporated into this. And --

23 MR. DOENNEBRINK: Please wrap up.

24 MS. CRAWFORD: I'll wrap it up real quick.

25 There are two things from Shoreline -- and this

1 They would have to at least accommodate some of  
2 the impervious surface out there to say they're going  
3 to improve the environment. It sounds to me like  
4 they're just covering what they're putting in.  
5 They're saying that there's going to be water quality  
6 for the new and replaced surfaces. If you notice that  
7 statement leaves out detention, which is a fairly  
8 important thing when you talk about stream water  
9 flows.

10 In the fish and wildlife section they say  
11 there's no net effect on wildlife and fisheries and  
12 that best management practices would be used. I'd  
13 like to give you a handout from Sound Waves, which is  
14 the Puget Sound Water Quality Action Team people, and  
15 they talk about what is best management practices for  
16 storm water, and this project is very far from that.

17 I've heard several times that this project is  
18 using current techniques, and it's not. Low impact  
19 development. Low impact development is an eco  
20 friendly approach to land development, storm water  
21 management, designed to reduce impacts on the  
22 watershed hydrology and aquatic resources. Watershed  
23 hydrology is the relationship between the rainfall  
24 evaporation, ground water infiltration and flow of the  
25 surface water. We're not using any of these

1 is my most important point here. We can't have all  
2 these amenities but forgetting about our resources.  
3 When they brag about our city it is Twin Ponds. It's  
4 Boeig Creek. It's all these wonderful natural  
5 resources. We can't forget them when we're doing  
6 these development projects, and your project, A and B,  
7 has totally forgotten that these are salmon streams on  
8 either side of Aurora.

9 MR. DOENNEBRINK: Thank you.

10 MR. CRAWFORD: My many name is Tim Crawford.  
11 Twenty-three twenty --

12 MR. DOENNEBRINK: Can you hold on? Just a  
13 second.

14 MR. CRAWFORD: 2326 North 155th, Shoreline. I  
15 would like to say on my wife's behalf that I believe  
16 she supports Alternative C, and I also support that  
17 alternative.

18 I also would like to say that I am here in  
19 support of Dan Mann, a personal role model of mine; a  
20 decorated war hero. I think it's despicable what goes  
21 on with character assassination within our city. I am  
22 a citizen with standing -- are you getting that back  
23 there? I am a citizen with standing. So is Dan Mann,  
24 contrary to -- to the opinion of my -- my -- my city  
25 councilmen. I -- I feel that we are citizens in

standing. I want to expand on the subject my wife brought up, low impact developments. And again, I want to read from -- from the Sound Waves.

Why is LID important? Studies show that our efforts to mitigate the affects of development through traditional storm water management practices have not proven entirely successful. Traditional storm water management practices will be oil, water separators, retention ponds, those types of things.

Collection and conveyance systems, storm water ponds and other traditional storm water facilities do not replicate natural systems which greatly slow water before it reaches streams, wetlands and other waters. The loss of trees and other vegetation, the compaction of soils by heavy equipment, the creation of vast stretches of connected impervious areas and all these factors combined are extremely difficult to compensate for using traditional practices.

The result: Storm water runoff has significantly degraded many streams in the City of Shoreline. I'm superimposing "Shoreline" for Puget Sound. Habitat loss is documented as one of the factors limiting our ability to recover salmon under the Endangered Species Act. A multi-year study in King County showed that amphibians and birds in

wetlands are threatened more excessive -- by excessive functions and water levels than by water pollution.

So what that's telling us is these large storm rushes and flows that we're not accounting for are really doing as much harm as the pollutants in our stream. I don't want to see us improve -- while like I -- my wife and I -- the opinion we voiced four years ago at a meeting was that we didn't believe that Aurora could ma -- be made into a downtown Juanita, and we still don't.

COMMISSIONER DOENNEBRINK: Wrap it up, please.

MR. CRAWFORD: We think that our businesses and our environments within the City of Shoreline will suffer if that's our goal.

MR. DOENNEBRINK: Thank you.

Okay. Ginger. And Randy Ferrell and Dennis Lee are the next two.

MR. BOTHAM: Ginger Botham, 16334 Lynden Avenue North. I've lived in Shoreline 20 years. I'm now a neighborhood rep but I'm not speaking as a neighborhood rep.

We moved to the Seattle area when I was four and we moved to Bellevue when I was 12. At that time period I went to Oak Lake Elementary where the Larry's is, and then to the junior high past that.

First there were no medians. Then there were medians. Then there were no medians, and there are medians there again. I lost track during about a 15-year stretch, so there may have been medians put in and taken out a couple more times in that stretch at about 105th to 120th.

If you put in the medians, I promise you that they'll come out again at some point in the future based on the history of what I saw south of here. That was my point No. 1.

No. 2, this EIS that's fragmented, that's a problem. It shouldn't be that way. I all -- I read the -- the big Aurora corridor report, not the short one, and I think I listed six or seven related documents. And there was no way I could sit in the County Clerk's office and read those. I don't have that kind of time in my life, and I'm an at-home mother. If anybody has the time, I do.

My third point, the EIS says that probably there won't be any road work at night, but we're going to leave that option open. In spring of '97, when I first started attending meetings, they were talking about the noise rules for construction. And the City of Shoreline kept the ones they had, which were very generous to contractors. Weekdays it's 7:00 in the

morning until 10:00 at night. Weekends it's a little bit kinder, but not by much.

I live a block from Aurora. This project is going to run for 18 months if it's on schedule, and then the next step will start. I'm by 165th. So I'll get that 18 months also. I want to sleep after 10:00, and I don't want it because it's -- I've got ear plugs in. We have fires. We have accidents. I want to be able to hear them if they happen. I want to hear my smoke alarms.

I live next to Aurora. You assume it's noisy. After 10:00 it's not. The train whistle on Richmond Beach wakes me up at night occasionally. It's quiet in Shoreline. Don't make it noisy after 10:00, please.

MR. DOENNEBRINK: Thank you.

Randy Ferrell. No. 3 would be Ken Meyer.

MR. FERRELL: My name is Randy Ferrell. My -- this year my construction business celebrated 40 years at 17510 Aurora Avenue North.

For those who say that there won't be any impacts to businesses, I'd like to call your attention to Table 3-39 beginning on Page 3-120. This table lists just the buildings with potential historic significance along the entire corridor and the

1 expected impacts. Ours is one of nine buildings  
2 scheduled to be demolished and removed. Others slated  
3 for demolition include Aurora Rents, Seattle's Finest  
4 Exotic Meats, Monarch Appliance and Spiro's Pizza.  
5 Now, these are for the Phase 2 of the project, not  
6 Phase 1, but the city has had to show its hands here  
7 in the environmental document.

8 Another 34 properties are scheduled for  
9 right-of-way encroachments, which could mean anything  
10 from loss of a few parking places to demolition of  
11 part of their building. Note that with two exceptions  
12 this does refer only to buildings constructed prior to  
13 1950. The city has provided no information about all  
14 those -- how all the other buildings could be  
15 impacted.

16 This table is significant as it's the city's  
17 first public acknowledgement that its plans will  
18 result in the destruction of several existing business  
19 properties. Unfortunately, it does not go on to  
20 disclose that more than 20 other businesses will have  
21 their buildings demolished for the -- related to the  
22 Interurban Trail project. Together these projects  
23 will wipe out more than ten percent of all existing  
24 businesses on the Aurora corridor and have serious  
25 impacts on most of the others.

1 Now, the city has never sought to seriously  
2 involve the Aurora business community in the design  
3 and decision processes. I cite that the -- the City  
4 Council's resolution passed on October 28, 1998  
5 authorizing the formation of the CATF stated there  
6 should be five positions on the CATF for Aurora Avenue  
7 business and property owners, and one -- plus one  
8 position for a Chamber of Commerce representative on  
9 this 13-member task force.

10 Defying that resolution, they then went on to  
11 appoint only one Aurora Avenue business owner, Chuck  
12 Olson, to sit on that task force. The other business  
13 owners on the task force were not Aurora Avenue  
14 business owners or property owners.

15 The CATF did not keep accurate records. Of the  
16 14 meetings, they only have records of four. They  
17 make no mention of the testimony of dozens of business  
18 owners and individuals opposed to the city's design.  
19 They make no mention of debate -- debate over sidewalk  
20 width, nor do they recode -- record any votes on the  
21 sidewalk width. The only vote they do mention is  
22 recorded on a different night than when it actually  
23 occurred. These are important points since the city  
24 gives such weight to the recommendations of the CATF  
25 throughout this DEIS.

1 The -- the city initially applied for a NEPA  
2 categorical exclusion instead of doing the EIS. Now,  
3 the -- the categorical exclusion can only be used if  
4 there's no significant opposition to the project.

5 That was patently untrue and they knew it.

6 MR. DOENNEBRINK: Please wrap it up.

7 MR. FERRELL: I'll wrap up.

8 In conclusion, the process which has been touted  
9 as fair and open has been anything but. Any other  
10 neighborhood in the city would be outraged if it  
11 received the kind of treatment the Aurora business  
12 neighborhood has received. I urge the Planning  
13 Commission and the citizens of Shoreline to join  
14 businesses in saying this sets a horrible precedent  
15 and it's just plain wrong. I urge you -- urge you to  
16 seriously consider the plan developed by Ken  
17 Cottingham and the Shoreline Merchants Association.

18 MR. DOENNEBRINK: Thank you.

19 Dennis. And No. 3 is Dr. Winfield Hutton.

20 MR. LEE: My name is Dennis Lee. I'm the  
21 president of Concerned Citizens for Shoreline and I'm  
22 speaking for them.

23 One of the things that has been covered is the  
24 raised median. I am over 50 years old. I've been  
25 driving for awhile. There's no mention whatsoever of

1 the consequences of a raised median. When I drive in  
2 businesses and in areas -- like if you had a  
3 development that was going to go in where you had  
4 level desert, it would be really nice to have raised  
5 medians and a block behind for everybody to come  
6 around and through.

7 We have a comprehensive plan that said preserve  
8 the character of neighborhoods. There's a sham going  
9 on. These neighborhoods don't know what's happening.

10 They hear this glossy stuff about raised medians  
11 fixing things, but in this EIS you have to talk about  
12 what happens when you do that. How the cars turn  
13 left. What routes are they going to take. And if you  
14 do that, you need to include those stakeholders.

15 The part of the process that bothers me the most  
16 is this stakeholder business. And I don't see that  
17 word coming up very much. I know what it means. The  
18 businesses from 165th to 145th, at one of the City  
19 Council meetings they were talking about talking to  
20 the stakeholders. And when I went to find out, I'm  
21 pretty sure what they did is pulled the tax parcel  
22 records. Those are the landowners. Those business  
23 owners along that district did not know what's going  
24 on. There was a petition sent out, and it was signed  
25 by most of them that they didn't agree with A or B,

1 and that they didn't know what the impacts of those  
2 would be anyhow.

3 Now, since then I'm sure the city has done a  
4 business survey. I would like to see the public  
5 record have that information to us so we can see what  
6 exactly went on with those businesses. And when I say  
7 businesses, I mean the people who own the businesses.  
8 The small mom-and-pop businesses or the large  
9 businesses. But there's no mention of that anywhere.

10 And maybe they just asked them what -- whether  
11 it was raining that day. I don't know. But those  
12 businesses are clearly not informed. And that's why  
13 you're getting this heat from business groups, is  
14 they're feeling left out. And as you roll this steam  
15 roller down the rest of the way you're setting a  
16 precedent with this piece. So this piece should apply  
17 for the rest. And it's very important you do that.

18 And I support Proposal C.

19 I'm looking at my notes here because I don't  
20 want to leave something out.

21 The other one I see, I get mailings from the  
22 city talking about these 400 meetings that we went  
23 through to decide where this is going. I would like  
24 to see the kind of -- not the minutes from all those  
25 meetings, but some sort of an overview of where that

1 MR. DOENNEBRINK: Wait until they quiet down.

2 Dr. Winfield Hutton is second, and third will be  
3 Paulette Gust. Okay.

4 MR. MEYER: Okay. My name is Ken Meyer. I  
5 live -- live at 1509 North 143rd Street which is  
6 marginally in Seattle. However, I note that this  
7 project doesn't incur -- have an incursion into  
8 Seattle and I wonder why we haven't heard more about  
9 it down there, as much as we have this direct, as well  
10 as, of course, a huge indirect impact of this -- of  
11 this project.

12 I spent a lot of my life as an engineer doing  
13 safety analysis of one sort or another. My wife and I  
14 use this area a lot, between -- especially between  
15 145th and 155th on foot and in vehicles.

16 I -- I second the motion of people who said that  
17 these -- these EISs should be more available. They  
18 should have been on the web site in Acrobat format.  
19 You could burn a CD and sell it at a profit for a buck  
20 a piece. And if you really wanted those citizens to  
21 under -- know what was going on, you would provide  
22 those sorts of -- of ways to understanding.

23 Now, there are two arterials carrying traffic  
24 through Seattle. Aurora is one of them. There won't  
25 be any more. The EIS says that regional book

1 was heading. Because in the beginning, with the  
2 comprehensive plan, there were some visions and some  
3 framework goals, and now there seems to be this plan  
4 that no matter what anybody does it tends to move  
5 right along.

6 I'm always scared when I see the name CH2M Hill  
7 on any report. They're the ones that wanted to annex  
8 the city of -- Shoreline water department because they  
9 thought it was a good idea, and it was a total  
10 conflict of interest there.

11 MR. DOENNEBRINK: Please wrap up.

12 MR. LEE: East/west traffic. What about it?  
13 It's one of our biggest problems here and it's not  
14 being dealt with. It's going to be made worse.

15 Thank you.

16 MR. DOENNEBRINK: Thank you.

17 We're going to take a five-minute break,  
18 everybody get a chance to stretch, and at ten minutes  
19 to 9:00 we will resume.

20 (A pause was had in the proceedings from  
21 8:43 p.m. to 8:55 p.m.)

22 MR. DOENNEBRINK: Let's reconvene. Okay. Ken  
23 Meyer is going to be first.

24 (Many voices speaking at once. The meeting is  
25 coming to order.)

1 responsibilities must be considered, and then it goes  
2 on for 200 pages completely ignoring those  
3 responsibilities, as a number of the commenters have  
4 tonight.

5 Of course, the EIS does provide interesting  
6 anecdotes about the history of the region, but when it  
7 comes upon a fact that air quality will decrease, the  
8 resolution is that, oh, well, we're already in  
9 violation, end of subject.

10 There are three ways to move traffic. Okay?  
11 Faster. You can do it at a higher rate, which is  
12 speed, you can do it more at a time, which is lanes,  
13 and you can do it with lower overhead, which means no  
14 impediments such as traffic lights. Okay? This  
15 afternoon I came down from Lynnwood on 99 there.  
16 Traffic was moving at 55 miles an hour. You know,  
17 that was what you had to do to keep up. Okay? You  
18 want to reduce it to 40. People will still go 55.  
19 The only thing that it does is enable you to pad the  
20 budget by becoming a speed trap. Okay? You have lost  
21 25 percent in the capability to move traffic by doing  
22 that.

23 Lanes. You want to take away one-third of the  
24 capacity of this road in order to service some buses  
25 that will come by every ten minutes. Okay. And --

1 and -- which is not available for the majority of the  
2 way to Seattle, so there are other sphincters, you  
3 know, which are impeding this. It is not going to  
4 help to have the higher capacity within a one-mile or  
5 a three-mile range.

6 Okay. Overhead, more traffic lights. You  
7 **T-84** can't -- I don't think you can synchronize traffic  
8 lights in two directions at once. When I came down  
9 from Lynnwood, of course the -- the traffic was  
10 favoring outbound. I was nailed at almost every  
11 traffic light, and the way you avoid that is you go  
12 really fast between them. Okay? Which is not  
13 conducive to the safety objective.

14 People --

15 MR. DOENNEBRINK: Please wrap it up.

16 MR. MEYER: Wow.

17 People have said that this is a democratic  
18 process, and I say most of the people who are affected  
19 by this don't know about this. They don't live in  
20 Shoreline, and they're being completely ignored, and  
21 it's -- it's up to this town to assume their position  
22 in the Northwest and -- and to -- and -- and to help  
23 with moving the traffic instead of hindering it.

24 MR. DOENNEBRINK: Thank you.

25 Okay. Dr. Winfield Hutton.

1 DR. HUTTON: Yes. Hi. I'm Dr. Winfield Hutton.  
2 I do live in Shoreline at 15138 Stone Lane North,  
3 B-106. I do not own a car. So I'm a pedestrian and a  
4 bus rider. Thus my comment.

5 A raised median is absolutely necessary as a  
6 safe zone for pedestrians crossing such a very busy  
7 highway as Aurora, especially at 152nd Street where I  
8 have to cross it to catch a bus because there's no  
9 traffic light there, and at present there's not even a  
10 crosswalk there. Therefore I would request, please,  
11 **T-85** paint the crosswalk that you've already planned at  
12 152nd Street as soon as possible.

13 Someone once said, in answer to a letter I wrote  
14 about this, pedestrians have the right-of-way at  
15 intersections even without a crosswalk, but  
16 practically no motorist knows this or honors this at  
17 152nd and Aurora. And as a 67-year-old I can no  
18 longer run as fast as I previously could, so crossing  
19 Aurora to get to the bus stop is increasingly perilous  
20 for me.

21 Finally, on a personal basis, as a person  
22 without a car, could I please get a ride with anyone  
23 to Aurora after the hearing, preferably somewhere near  
24 **T-86** 155th and Aurora? I support Plan A most heartily.

25 Thank you very much.

1 MR. DOENNEBRINK: Thank you.

2 Okay. Paulette Gust, Bill Bear and then Mark  
3 Deutsch.

4 MS. GUST: You can come find me, sir. I have my  
5 car with me tonight, and we can put a couple miles on.

6 DR. HUTTON: Thank you.

7 MS. GUST: My name is Paulette Gust. I live in  
8 Shoreline at 14805 Whitman Avenue North, Apartment  
9 No. 10.

10 And tonight I want to comment in support of  
11 **T-87** Alternative A, the proposal that CH2M Hill distilled  
12 from hours of public meetings and reams of public  
13 commentary. This alternative comes closest to meeting  
14 the goals of creating a safer street scape for all  
15 users, and environment for economic vitality  
16 previously unseen in Shoreline, and a sense of place.

17 Alternative A is superior in every respect, but  
18 for tonight I want to contrast the business access  
19 transit, called BAT lanes in Alternative A, with the  
20 **T-88** High Occupancy Vehicle, call them HOV lanes, in  
21 Alternative B. I even created a matrix that I can  
22 leave with you if you'd like.

23 Transit vehicles may travel in BAT lanes or HOV  
24 lanes, but the BAT lanes keep the buses moving better  
25 because the buses can stop and pick up in lane. In

1 the HOV scenario Wash DOT would suggest, prefer, maybe  
2 even require that the buses use pullouts. Even if  
3 these pullouts didn't take up precious right-of-way,  
4 and they do, they are a poorer solution because using  
5 the pullout means the bus needs to merge back into  
6 traffic and that creates delays for the transit  
7 system.

8 Now, among the early identified goals for the  
9 Aurora project was making transit more attractive, and  
10 facilitating the movement of buses goes a long way  
11 toward making transit more attractive, and in this  
12 case the BAT lanes are more transit friendly than the  
13 HOV lanes.

14 Also, because there's only a four-foot buffer  
15 between pedestrians and vehicular traffic, it's  
16 important to have the fewest vehicles and hopefully  
17 the slowest moving vehicles nearest to the curb. Any  
18 general purpose traffic using the BAT lane would need  
19 to turn at the next intersection or driveway. So  
20 these vehicles would be moving more slowly than  
21 through traffic.

22 You can contrast that with HOV through traffic  
23 which would be likely moving toward the upper speed  
24 limit. So in this way the BAT lane provides an  
25 acceleration and deceleration lane for vehicles

1 entering and leaving businesses. And that makes  
2 business access safer, too. So please consider this  
3 statement in support of the BAT lanes.

4 And I can leave with you -- until this little  
5 timer goes off I can tell you about some of the things  
6 on this matrix. Allow transit vehicles to move  
7 quickly and easily between zones. This is the only  
8 one where the HOV lane got merely a check mark. In  
9 all the other criteria that I looked at -- and I'd be  
10 willing to look at other criteria -- the BAT lanes  
11 came out ahead.

12 Allow the transit vehicles to quickly resume  
13 travel after leaving the zone. Separate transit  
14 vehicle maneuvers from through traffic. That should  
15 please those SOV drivers. Separate business access  
16 vehicle maneuvers from through traffic. That pleases  
17 anyone that wants to get in and around a business.  
18 And it says create an acceleration/deceleration lane  
19 for business access.

20 The BAT lanes complement the transit signal  
21 priority better at the intersections, and that's one  
22 of the things we want to do to keep our transit  
23 moving. It makes transit more attractive.

24 Thank you. Have a good night.

25 MR. DOENNEBRINK: Okay. Bill Bear. No. 3 is

1 now a Mark -- or Jim Shea.

2 MR. BEAR: Bill Bear, 2541 Northeast 165th  
3 Street, Shoreline.

4 I want to -- this is about the environmental  
5 impact of -- on different species, and one of the most  
6 endangered species on the planet is us, homosapiens.  
7 And we're also one of the most invasive species on the  
8 planet in that where we go pretty much everything else  
9 gets wiped out.

10 It's unfortunate that you look around this room  
11 right now and you see that there's lots of space and  
12 everybody is relatively comfortable. But could you  
13 imagine for a minute that everybody in this room would  
14 have to fit into the space just in this one quarter of  
15 the room? We would be stepping on each other's toes.  
16 We'd be elbows and -- and such, and even accidentally  
17 hurting each other.

18 And the sociology and the demographics and all  
19 of the studies tell you that as you concentrate people  
20 into higher and higher density, the health effects,  
21 the life expectancy effects, the quality of life  
22 effects, all decrease.

23 Now, this isn't a Shoreline problem. This is a  
24 worldwide problem. All the people in the world are  
25 moving from the farms and the villages into the big

1 cities and concentrating and concentrating. And the  
2 general impression from most people who study this  
3 stuff is that the quality of life is detrimentally  
4 affected and the -- and the existence even of humanity  
5 is -- is more and more in danger just by the fact of  
6 increasing density.

7 This Aurora project is part of increasing the  
8 amount of cars and the amount of people that can fit  
9 into a smaller space. We talked about how many more  
10 cars we'll get into this same space. That is going to  
11 increase accidents. That is going to increase air  
12 pollution. That is going to increase the harm to  
13 homosapiens, human beings. So we have to consider  
14 that.

15 I come from New York City. In New York City  
16 there are 12-lane-wide highways, in New Jersey and  
17 in -- rather in New Jersey next to it, coming into New  
18 York City. Twelve lanes of traffic. It didn't start  
19 off being 12 lanes of traffic. It got there because  
20 they built additional lanes thinking that somehow that  
21 would accommodate the traffic. And in fact, on any  
22 given day you can see the cloud of -- of -- of air  
23 pollution over that stalled traffic trying to get in  
24 and out of New York City.

25 We don't need to increase concentration of

1 people in areas like Shoreline and Seattle. We need  
2 to have more distributed ways of living and working.  
3 And so I encourage you to consider it thoughtfully  
4 what the overall impact of this will be on human  
5 beings. It's not just about safety.

6 The other aspect of this is that this is about  
7 social engineering. People have talked about the fact  
8 that this is going to beautify Aurora. This is going  
9 to get out those old, rundown businesses and put in  
10 big, modern, new stuff.

11 MR. DOENNEBRINK: Wrap it up.

12 MR. BEAR: The problem with social engineering  
13 using public money to benefit one group of people but  
14 also to harm another group of people, that's a bad  
15 approach.

16 Thank you.

17 MR. DOENNEBRINK: Thank you. Mark Deutsch.  
18 No. 3 is Won Han.

19 MR. DEUTSCH: Mark Deutsch. I'm at 197th and  
20 Ashworth in Shoreline and I've been here about 10 or  
21 so years.

22 I just want to make a few comments. I have  
23 certainly been listening to a lot of folks here  
24 tonight express a lot of opinions. I personally am  
25 here in favor of Alternative A. I know that there are



1 some other folks who have rather strong opinions that  
2 I guess I'm still a little bit surprised how strong  
3 they are holding onto that at this point.

4 When I was more involved with city activities I  
5 do remember -- I think somebody was mentioning about  
6 the Aurora study that was done in '99. And I guess  
7 from my perspective, I was thinking that that was sort  
8 of the comprehensive look at the Aurora corridor. And  
9 so I guess I'm not surprised by breaking it into  
10 pieces like the 145th to 165th because the city  
11 eventually said: You know what? We've got to pick  
12 the place where supposedly there would be less  
13 controversy. And I guess if this is small  
14 controversy, I guess I wonder what's ahead.

15 From my perspective, the thing that helped me  
16 get a better sense of where things were at was when I  
17 did pick up -- somebody asked about, you know, getting  
18 a CD and stuff -- the central area, subarea plan, and  
19 looking at the vision there. That helped remind me  
20 about a -- a presentation that was done that the city  
21 helped encourage some while ago about walkable  
22 communities.

23 And at that point I was reminded in saying,  
24 okay, yes, it's true. Aurora is a state highway and  
25 there isn't much we can do about that. And so from my

1 perspective I hate part of this alternative. I hate  
2 that there's going to be these big buses in basically  
3 a dedicated lane coming through here, but at least I  
4 at the same time recognize that these raised medians  
5 are definitely a way that helps toward both traffic  
6 safety as well as pedestrian safety.

7 As the Shoreline resident who is the bus driver  
8 indicated, absolutely, we need those refuges there.  
9 We need things that are going to help -- hope to  
10 reduce the amount of accidents especially if people  
11 are trying to make better use of transit. I think all  
12 of us are having to accept the consequences of the  
13 Growth Management Act, and it seems to me that this is  
14 one of the natural fallouts of that.

15 I am looking for Shoreline to get improved, and  
16 as much as -- as I think Walt Hagen mentioned that  
17 it's always going to be a bedroom community, I can  
18 absolutely understand that. On the other hand, I  
19 absolutely do a bunch of shopping here and I'd like to  
20 do more. I'd like to see other businesses locate here  
21 so that maybe more of us have an opportunity to  
22 commute within Shoreline or to -- or to Seattle up in  
23 the north end and not have to go so far like I do  
24 today out to the east side.

25 So I'm here again in favor of Alternative A, and

1 I hope that all of us in the end will be able to come  
2 to enjoy the change that we're having to accept.

3 MR. DOENNEBRINK: Thank you.

4 Okay. Jim Shea is next, and then Won Han, and  
5 Janet Way is third.

6 MR. SHEA: Hi. I'm Jim Shea, and I live at  
7 163rd and Interlake Avenue North here in Shoreline.

8 I want to speak in favor of Alternative A. Let  
9 me start first by reviewing facts that some of us may  
10 have forgotten. In August of 1999 the Aurora Concept  
11 was born. The concept was the result of an extensive,  
12 fair and open process. And this is -- it was handed  
13 out earlier. This is a copy here of the points.

14 Each and every citizen, and yes, each and every  
15 merchant had an equal opportunity to express their  
16 views, opinions and hopes for what Aurora, our main  
17 street, would become. Every view and every suggestion  
18 was heard, oftentimes loudly, and considered. Many of  
19 these ideas became part of the concept. Some were  
20 not. That is the way it is. Most people in our city  
21 understand you can't always have everything you want.

22 Three years have been wasted. We've had three  
23 years of delays thus far. I'd like to take a few  
24 minutes to speak about the cost of these delays to  
25 date. Then I'll speak about the costs of further

1 delays.

2 Inflation costs. We lose an estimated \$1  
3 million per year due to inflation. Remember, grants  
4 are for fixed amounts. They don't increase at the  
5 rate of inflation. That money is gone forever.  
6 Societal costs. I won't bore you with the details.  
7 Another person more eloquently spoke of them, but it's  
8 been estimated that \$10 million per year for our  
9 three-mile stretch of Aurora is the cost. There are  
10 many accidents each and every year, and a two-way  
11 left-turn lane is the major reason. Our section of  
12 Aurora is one of the most dangerous stretches of road  
13 in the state of Washington. This was recently stated  
14 and confirmed at a community meeting by WSDOT  
15 Secretary Doug McDonnell.

16 Other cities and states with si -- roads similar  
17 to our stretch of Aurora report that replacing the  
18 two-way left-turn lanes with raised medians with  
19 cutouts for business access and U-turns eliminates  
20 nearly half of the accidents, nearly cuts in half  
21 vehicle injury rates, and cuts pedestrian fatality  
22 rates by nearly 80 percent. Keeping things the way  
23 they are is costing us \$5 million per year each and  
24 every year, and that's at the least.

25 Businesses that we want here in Shoreline.



Wouldn't it be great to have a thriving and vibrant Aurora Avenue running through our city? Our stretch of Aurora isn't something to be proud of at this point. So many empty lots, empty buildings, and rundown and unattractive businesses. A redeveloped Aurora will be the impetus for much needed change and improvements.

Sadly, Underhill's Furniture is closing its store here in Shoreline. I suspect the many delays have disillusioned the owner and were at least a part in the decision to leave. With it go tax revenue, as well as a really good local business. We must move forward now to keep our good businesses and create an atmosphere and climate that will attract more new businesses.

If you do the math, the delays have already cost \$15 million at the very least. If you ask how, three years of losing that \$1 million due to inflation, and \$4 million per year in societal costs. This doesn't consider revenue as businesses leave and missed opportunities as new op -- new businesses locate elsewhere because people are fighting this with everything they have to delay indefinitely this project.

It costs us \$5 million a year, at least, every

year that we delay. Please, let's stop the delays. Let's move forward and obey the will of the people here in Shoreline. Let's start transforming Aurora into our true Main Street.

Thank you for your consideration.

MR. DOENNEBRINK: Okay. Mr. Han. And third is Daniel G. Mann, which is a different. One.

MR. HAN: My name is Won Han. My -- I live at 1616 Northwest 185th Street. I'm the owner of the property on Aurora, 16523 Street -- I mean one -- 16523 Aurora Avenue North.

And the people talking about the -- the safety. Let me introduce my case. As I mentioned, my address and property address are 16523, which is less than 200 feet of the 165 and the Aurora Avenue which they're going to build on the traffic light by the city's plan.

Anyway, I got the change the three different lane to, you know, the (inaudible) left turn -- left-turn park it, which is almost impossible. You have two, three cars, you know, are waiting for the left turn. That's impossible. And, you know, with the -- I understand the safety is very good to consider for everybody such as all the citizens, but, you know, people like me cannot -- you know, should

not be victimized. I have a right to develop the -- I got to use my property to, you know, best value, I mean best worth, and the people who are talking about the -- increasing the property value.

In all business, you know, by the book, in order to open up a business, location is most important matter. Location is determined by visibility and accessibility. And people like me, if there is the median to make the -- cannot make a left turn, impossible to make a left turn, my location, my property, is going to be dead. Property value is going to be way down.

Especially I'm in the -- my building plan is pending in the city right now. I'm in a dilemma. How can I fill the -- fill my property -- I mean, my building which is about 20,000 square foot? I have visited 23 different Korean businesses along -- on the Aurora Avenue. Nobody supports the city plan. They are worrying about the -- you know, the medians and the accessibility. Some people think about to move out, as soon as their -- their lease expires. This is -- you know, all the small businesses are concerned. It's like, you know, this is serious.

I know that I live in the -- in Seattle -- I mean in Shoreline for the last 20 years, in the

southern area. I'm really, really concerned about this, you know, Aurora corridor plan, and people like me should not be victimized. There is -- they've got to have some kind of solutions to make. And I'm really worried. I'm in a dilemma. I -- you know, even after my building is permit -- is permitted, I don't know whether I -- I really don't know I have to, you know, put up the buildings or not, unless, you know, there -- some kind of a solution comes out.

Thank you.

MR. DOENNEBRINK: Thank you.

Okay. Janet Way. And Cheryl Lee is third.

MS. WAY: Good evening. Thank you for your patience here this evening with this long process. I am Janet Way. I live at 940 Northeast 147th Street, Shoreline. I represent Thornton Creek Legal Defense Fund and Paramount Park Neighborhood Group. I'm a small business owner. I've lived in Shoreline since 1988.

I am skeptical of this plan. Why, you ask? Why am I skeptical? Because I have -- I have good reason to be skeptical from the source. That's why I'm skeptical. From my experience over the past ten years, I have had the experience of dealing with the city on numerous occasions, and more so recently than

1 ever I am more and more skeptical of the plans coming  
2 out of the city.

3 I have concerns with the following issues  
4 regarding the environment: Additional runoff  
5 possibilities from impervious surfaces, which is  
6 indicated in the handout, there -- that there would be  
7 increased impervious surfaces. Adverse impacts to  
8 wildlife from new impervious surfaces, especially  
9 endangered species, threatened and priority species.  
10 I have concerns about additional pollutants that won't  
11 be dealt with by the means that are mentioned in the  
12 plan. Cumulative impacts to salmon and other fish;  
13 cumulative impacts to neighborhood.

14 I believe that if you look at the Sears complex,  
15 I think somebody made a mistake when they planned that  
16 thing because not only is it -- did it have a negative  
17 impact to its surrounding area, it -- the amount of  
18 impervious surface eventually had a very bad impact on  
19 Boeing Creek. A large portion of this proposal will  
20 impact Thornton Creek, and that's why I have a concern  
21 about Thornton Creek since it is already threatened.

22 Also, cumulative impacts to small businesses. I  
23 support a true sustainable development -- I'm a member  
24 of Livable Communities Coalition -- but only that  
25 which provides water and air quality improvement.

1 Sustainability does not -- should not sacrifice the  
2 environment or the neighborhoods. I believe many  
3 cities have proven that 15th Avenue Northeast has a  
4 far greater safety problem than Aurora.

5 I see the Aurora Corridor Project as a  
6 potentially destructive concept if it were -- but if  
7 it were modified and if the citizens were listened to,  
8 the people who are most affected, it could become  
9 beneficial. I -- overall I believe the Aurora  
10 corridor proposal is not fully thought out regarding  
11 its potential impacts to the environment and the  
12 community. Thornton Creek must receive documented  
13 water quality improvement, by law, before this project  
14 can ever proceed.

15 The wildlife impacted, just a few of them are  
16 chinook, coho, sockeye, cut throat, rainbow,  
17 steelhead, river otter, blue -- great blue heron,  
18 beaver, muskrat, pileated woodpecker, redtail hawk,  
19 bald eagle, peregrine falcon, sharp shin hawk and barn  
20 owl. Just a few. I include by reference the  
21 Shoreline Comp Plan; National Marine Fisheries 4D  
22 Rule; Thornton Creek Watershed Characterization Report  
23 written by Thornton Creek Watershed Management  
24 Committee, of which I am a member; the basin-wide flow  
25 control study for Thornton Creek, or the Entranco

1 report; and the Shoreline Critical Areas Amendments  
2 Proposal which we reviewed for you -- with you on July  
3 11th in great detail. I'd like to include that into  
4 the record.

5 Thank you.

6 MR. DOENNEBRINK: Thank you. Okay. Daniel G.  
7 Mann. And third is Lanita Wacker.

8 MR. MANN: This is a draft of the Chamber's  
9 official statement in regards to the Aurora project.  
10 The finished draft will be submitted after tomorrow's  
11 executive board meeting.

12 MS. CURRY: Can I please have a copy?

13 MR. MANN: Thank you.

14 Good evening. My name is Daniel G. Mann, and  
15 I'm representing the Shoreline Chamber of Commerce.  
16 And the document that I just submitted to the -- the  
17 board here is the rough draft of the Shoreline Chamber  
18 of Commerce's position statement in regards to the --  
19 the Aurora project.

20 The Shoreline Chamber of Commerce, as most of  
21 you know, is the largest business organization in  
22 Shoreline, and it represents over 240 business  
23 members, and representing both large and small  
24 businesses here in Shoreline. And as most of you  
25 know, these businesses provide jobs, tax base, and

1 many of the -- I see many of the members here in the  
2 audience.

3 The Chamber's mission is to help build a  
4 thriving economic community in Shoreline that  
5 encourages economic growth and respects both the  
6 existing businesses and finds a balance between the  
7 neighborhoods, government and the environment. It's  
8 very important to respect the existing businesses and  
9 to encourage new businesses in Shoreline.

10 The Chamber started a process several months ago  
11 gathering the views of the general membership so that  
12 we could formulate this -- this statement. After  
13 going through a -- a long process of calling,  
14 e-mailing and meeting with the membership, the general  
15 membership of the Chamber, the Chamber Board of  
16 Directors formulated this document, and this is based  
17 on the -- the -- what we found from doing this -- the  
18 process.

19 To summarize, the Chamber opposes the current  
20 plans, A and B. They're too expensive, they're too  
21 extreme, and they'll damage business in Shoreline, and  
22 they'll create an environment in Shoreline in which  
23 the existing businesses and new businesses will not be  
24 able to thrive, some of the members wanted to do  
25 nothing. Some of the members did actually approve the

1 Plan A and Plan B, but the -- the vast majority of the  
2 members wanted a more moderate approach, something  
3 similar to Plan C.

4 Now I'm going to go into the document here, so  
5 it's pretty deep here. So the main points on the  
6 document here, or the main things that come up as an  
7 issue, are signage, the Chamber members are concerned  
8 that the signage, the cost of moving signs, replacing  
9 signs, will be too extreme. They want there to be  
10 grandfather clauses to protect the existing signs and  
11 to help cover the expenses of moving those signs and  
12 replacing those signs.

13 No. 2 has been omitted, and that is sidewalks.  
14 The Chamber Executive Committee is -- is still  
15 discussing the sidewalk issue at this point. There's  
16 two camps within the -- the Chamber board. One wants  
17 seven-foot sidewalks the entire length. The other  
18 wants seven-foot sidewalks where the -- where it would  
19 affect business or parking, destroy business or  
20 parking to have a 12-foot sidewalk, and then to have a  
21 12-foot sidewalk -- or the eight-foot sidewalk with  
22 the amenity zone in the areas where it would not  
23 affect business or parking. So that will be provided  
24 in the final draft of this document.

25 The third point is the medians. The Chamber

1 feels that having the raised medians, having plants,  
2 trees, shrubs in the median, would be dangerous. The  
3 Chamber wishes that there would be no center median  
4 except for pedestrian safety islands, and that these  
5 would be no wider than 12 feet. This would be for the  
6 safety of pedestrians and also for emergency vehicles.  
7 We find that a -- a raised median would block  
8 emergency vehicles. And also taking care of the  
9 plants would be dangerous as well.

10 Trees. That was another point, a very important  
11 point. The Chamber hopes that in the amenity zone  
12 there will be no trees and the vegetation along the --  
13 the side of the road will be spaced out and should be  
14 no greater than four feet tall.

15 Mitigation of impacts. This is something that's  
16 very important to the Chamber members. This is going  
17 to be a very lengthy process and it's -- it has the --  
18 it has the potential to destroy many existing  
19 businesses. We want the -- basically, the Chamber  
20 membership wants the plan to be carried out as quickly  
21 as possible, and good communication be maintained with  
22 the merchants, and to facilitate ingress and exits to  
23 the businesses during the process of construction.

24 Another point that was of great concern was the  
25 assessment of property and the costs that will be

1 reimbursed to the landowners and -- and so forth. The  
2 solution that the Chamber saw was to increase the  
3 allowable expense for assessing property value and to  
4 have a mediator available to resolve disputes when  
5 they come up.

6 Another point was the cost of hookups and  
7 utilities. This is very important to business owners  
8 because they -- they cannot operate without having  
9 their -- their utilities hooked up. The solution that  
10 the Chamber saw was to -- I'll be done in one  
11 second -- the project should pay for any hookups and  
12 utility connections and they should make it happen as  
13 quickly as possible to help protect the businesses.

14 And the last point here is -- has to do with the  
15 project costs, and to analyze the true costs of the  
16 alternatives so that the public can have -- can make a  
17 wise decision about what to do when they move forward.

18 To summarize, the Chamber opposes current Plans  
19 A and B, wishing for a more moderate plan similar to  
20 Plan C, and thank you for your time.

21 MR. DOENNEBRINK: Thank you.

22 Cheryl Lee.

23 MS. LEE: Good evening. My name is Cheryl Lee.  
24 163rd -- or 160th and Wallingford.

25 It's been awhile since I've seen many of you,

1 but tonight I'm here to speak as a resident of  
2 Shoreline, a 23-plus-year resident of Shoreline. And  
3 you know, listening to NPR I hear it all the time  
4 about life in America, different towns, and about, you  
5 know, great American towns or cities that were once  
6 thriving and now we have a lot of retired people who  
7 are struggling to keep it going, and I think a lot of  
8 that happened because nobody had the foresight or  
9 nobody had the desire to invest early when it was  
10 opportune to do it.

11 And I see this Aurora project as truly an  
12 investment opportunity. It is a true economic  
13 development opportunity, not just for now, but for the  
14 future when many of us may not be here. I'm like  
15 many of you. I don't know whether I'm going to be  
16 alive tomorrow or not, but many of us may not be here.  
17 You know, we're going to have our future generations,  
18 and we hope that they want to come back, that they  
19 want to live here, they want to raise their families  
20 here.

21 And to be honest with you, you know, if I had  
22 the option of having a house on Aurora, I'm sorry, I  
23 don't think I want to live on Aurora the way it is  
24 now. We do need to improve it. We've got 40,000-plus  
25 cars going through that street. Then why are we

1 having struggling businesses that are, like, trying to  
2 sustain themselves? Something's wrong. The equation  
3 doesn't match. I'm an engineer. The equation has got  
4 to work out.

5 So, you know, we really have to be visionary in  
6 this. And in terms of Plan A are Play B -- Plan B, I  
7 <sup>105</sup> really think it should somehow come somewhere in the  
8 middle. And I pretty much guess that that's where  
9 we're probably going to head in terms of  
10 recommendations, but I know I see A and I see B and I  
11 really see some room for compromise there. But I  
12 really encourage you all. I mean, we have a  
13 tremendous opportunity here to invest so that we're  
14 not -- we're not -- Shoreline does not become another  
15 NPR story.

16 I haven't had a chance to talk to, you know,  
17 extensively, some of the Asian American businesses,  
18 but I have personally had a chance to talk to at least  
19 five of the businesses, Korean American owned  
20 businesses, and they say, you know, do something about  
21 Aurora. It looks gross. It's awful. Do something  
22 about it. Make it better. Make it, you know, more  
23 appealing.

24 So whether you -- either you give them just a  
25 median or do you give them the whole package. You

1 can't have both. You've either got to give something  
2 and you've got to take something in return. And I  
3 hope that I encourage the Planning Commission, the  
4 council, to really work together with the citizens to  
5 come to that balance, but please, we need to invest  
6 now or else we're going to become another desolate  
7 town story on NPR.

8 Thank you.

9 MR. DOENNEBRINK: Thank you.

10 Lanita.

11 MS. WACKER: Lanita Wacker, 19839 Eighth Avenue  
12 Northwest. I'm a citizen but not a business owner on  
13 Aurora. I decided to speak this evening because of  
14 some personal attacks. I stand here to support an  
15 individual, Daniel Mann, and his right to speak out.  
16 I also support the right of Dale Wright to speak out.  
17 Both of them have the right to their opinions.  
18 Neither of them speak my opinion.

19 Now, I am not an engineer as Cheryl is. I  
20 support a median, a center median. I am afraid of  
21 heights. This is me, Lanita. I'm afraid of heights.  
22 I personally am afraid of Aurora every time turning at  
23 that double-turn lane. It petrifies me. It also  
24 petrifies me even seeing somebody attempting to cross  
25 Aurora. And so I support a median.

1 However, I also agree with Bonnie Mackey that  
2 grandeur -- that a great street has a grandeur and a  
3 presence. Bonnie Mackey is fortunate in that she  
4 lives in the Highlands. People who live in the  
5 Highlands value trees. They value natural resources.  
6 Patti Crawford came -- excuse me -- to this podium and  
7 spoke about natural resources. The thing is she's has  
8 been fighting for natural resources. Bonnie Mackey is  
9 fighting for natural resources. We need to have  
10 <sup>106</sup> plantings along Aurora which will give us better air  
11 quality.

12 The weakness in this EIS statement is that it is  
13 for only one-third. You cannot study environmental  
14 impact without studying the total. You're talking  
15 <sup>107</sup> about air quality. You're talking about water  
16 quality. These things do not have political  
17 boundaries. They don't stop at 165th and 145th. They  
18 go beyond that. And so that is a weakness in this  
19 Environmental Impact Statement.

20 The impervious surfaces are very important to  
21 study, and I have brought this before the Planning  
22 Commission over and over since the onset of the city.  
23 Impervious surfaces are the rooftops. They are the  
24 asphalt. They are the sidewalks. All of those things  
25 must be considered as we grow in this city. Adding

1 the trees, adding planting strips, can enhance air  
2 quality. It can aesthetically enhance things.

3 And I do not know, I am not here to say A, B or  
4 C, but I had to come up and speak. I -- if -- I'm the  
5 mother of four children, and if I could put Dale  
6 Wright and Dan Mann on timeouts in their bedrooms, I  
7 would do so.

8 MR. DOENNEBRINK: Thank you.

9 That's all the speakers that I have on my list.  
10 Are there any -- oh, I have another list?

11 MS. CURRY: I have one. Just one.

12 MR. DOENNEBRINK: Oh, just one. But if there  
13 are other people who have not had an opportunity and  
14 wish to speak, then you can start lining up here, but  
15 this other list has Bill Murray on it.

16 MR. MURRAY: My name is Bill Murray. I'm a  
17 resident of Shoreline; have been for 40 years.

18 MR. DOENNEBRINK: Can you state your address,  
19 please.

20 MR. MURRAY: I'll give you my business address.  
21 Okay?

22 MR. DOENNEBRINK: Fine.

23 MR. MURRAY: 18042 Aurora Avenue North. I've  
24 been a business owner here for 30 years.

25 And frequently when I come to meetings like this

1 the first thing my wife says to me, don't say  
2 anything. So again I promised her I will not say  
3 anything, but each time I find myself unable to  
4 control myself. So my comments here are numerous.

5 One is I don't have anything to do with 145th to  
6 165th other than to say that it's a very, very poor  
7 thing to have an EIS study that comprises of one area.  
8 And I've been in the business now -- I've been in the  
9 real estate world for 47 years. I've seen just about  
10 every city in this area developed. I've watched them,  
11 followed them, had meetings with people like Ed Sands  
12 who used to be the King County Planning Director, on  
13 and on and on.

14 And frankly, the most important thing that this  
15 group of people here, all the residents of Shoreline,  
16 need to keep in mind is that we are making decisions  
17 right now that we're going to live with, as the lady  
18 said just a moment ago, we're going to live with these  
19 decisions for a long, long time. And at 75 I'm not  
20 going to see very many of those future things, but I  
21 can tell you this, that these decisions are extremely  
22 important, and we better be very careful about how we  
23 formulate these things and make sure that they are  
24 with a lot of credibility.

25 Things that are being discussed here by people

1 who are lay people, it's nice that they have great  
2 opinions, but listen to people like Cottingham.  
3 Cottingham is an expert, and -- and I don't see very  
4 many people recognizing that because if they're  
5 supporting a given plan, not giving credibility to all  
6 the plans, they're -- they're not doing the job as  
7 they should do.

8 Now, someone mentioned property values. Let me  
9 give you an example of property values. In 1963 I was  
10 offered -- I was a VP of a company. We were an  
11 investment company. We bought a lot of properties  
12 in this area. Close to \$20 million in properties. At  
13 that time it was a lot of -- no. We bought a lot more  
14 than that. That was what we had in capital.

15 And I was offered a property that lies on the  
16 west side of Aurora from 250 -- 205th back up to the  
17 top of the hill. You know the property. You know all  
18 the businesses that have gone in and out of that  
19 location. All of them. Can you think of them?  
20 Dozens of them. You know why? They had a median  
21 running right down the middle.

22 I had a chance to buy that for a hundred  
23 thousand dollars and turned it down. A hundred  
24 thousand dollars.

25 MR. DOENNEBRINK: Please wrap it up.

1 MR. MURRAY: Yes.

2 We have a chance to look forward to major  
3 developments in Shoreline. This is just one little  
4 segment, this particular street. We're going to have  
5 many more meetings. And I've had a dream about  
6 Shoreline because I'm in the biz. I'm -- I have 60  
7 people in my company. I'm presently looking at other  
8 areas, unfortunately, because I don't see the promise  
9 of what we're doing at this point, within my time  
10 frame. I mean, I have to do something in the next  
11 year. And at the rate we're going, with two things  
12 having happened in this area, the car dealership and  
13 two fire stations, and to build a -- to build a -- a  
14 fire -- a train station on 75-dollar-a-square-foot  
15 frontage is ridiculous. To have that been approved  
16 was absolutely asinine.

17 Thanks very much. I've got a lot more I could  
18 say, but I won't.

19 MR. DOENNEBRINK: I have a feeling.

20 Oh, there are some other people? You two are  
21 coming up to speak? Yes?

22 Okay. State your name and address, please.

23 MS. CHANG: My name is Tuong Chang. I own Quest  
24 Inn. Address is 14817 Aurora Avenue North.  
25 (Speaking in Korean.)

1 INTERPRETER: My name is Kan H. Park. I was  
2 invited by the city to be here for possible assistance  
3 to the Korean speaking people who have difficulty in,  
4 you know, making their presentation.

5 UNIDENTIFIED: Speak in the microphone.

6 THE COURT REPORTER: They can't hear you.

7 INTERPRETER: My name is Kan H. Park. I'm not a  
8 member of this community but I came here as an  
9 interpreter for the Korean speaking people.

10 I have been doing my business here for 20 years.  
11 During that period of time I frequently travel from  
12 Seattle to Everett by using the Highway 99, and  
13 recently I have heard that it's -- the city would  
14 place the median on Aurora Avenue and I don't quite  
15 understand why, you know, placing this median that  
16 would lead the business -- that would lead to a slow  
17 down of the business and more predicament to the  
18 business in the community.

19 MS. CHANG: (Speaking in Korean.)

20 INTERPRETER: I don't understand, you know,  
21 this -- right now the economy is bad, and to make it  
22 worse, why the city is trying to make a median that  
23 cause, you know, the economy -- kind of slow down of  
24 the economy.

25 MS. CHANG: (Speaking in Korean.)

1 THE INTERPRETER: In doing business the location  
2 is the most important factor. And, you know, easy  
3 access for the customers to a business is a key -- is  
4 a -- is a key to the business.

5 MS. CHANG: (Speaking in Korean.)

6 THE INTERPRETER: Then the -- making people --  
7 it's making it harder for the people to have easy  
8 access to the business from the main arterial road so  
9 that, you know, the business experiences difficulties.  
10 It can hardly be understood. The business -- the  
11 customers are the key to the business and the business  
12 needs people who have easy access to the location of  
13 their business.

14 MS. CHANG: (Speaking in Korean.)

15 THE INTERPRETER: And also, the sidewalk with  
16 the 12-foot width is the idea brought up by the people  
17 who, you know, is very idealistic.

18 MS. CHANG: (Speaking in Korean.)

19 THE INTERPRETER: I -- based upon my own  
20 observations for the past 20 years, you know, we put  
21 up a sidewalk about ten years ago, and I have observed  
22 less than five people use that sidewalk.

23 MS. CHANG: (Speaking in Korean.)

24 THE INTERPRETER: And also I heard that the  
25 Interurban Trail will be created there, and it would

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1 MS. CHANG: (Speaking in Korean.)

2 THE INTERPRETER: I do hope that the city should  
3 consider the various different opinions of the  
4 residents and the business people in the community,  
5 and it would help so that it help the development of  
6 this beautiful city.

7 MS. CHANG: Thank you.

8 MR. DOENNEBRINK: Thank you.

9 Okay. Are there any other people that would  
10 like to -- also commissioners, if any of you wish to  
11 speak. We have the room until 11:00.

12 Mr. Johnson.

13 MR. JOHNSON: Mr. Doennebrink, I'm surprised  
14 that you were willing to introduce me. My name is  
15 Richard Johnson. I live at 16730 Meridian Avenue  
16 North, and I've lived in Shoreline since 1959, and  
17 I -- I remember Aurora being what it was then. Not  
18 much of a change. Still the old businesses, old  
19 buildings. Traffic, of course, was a little less  
20 heavy than what it is now.

21 And I have to be honest that I am looking  
22 forward to seeing Aurora change from what it is now to  
23 what it will become. I'm looking forward to being  
24 able to walk on sidewalks. And when I first heard  
25 about the -- you know, the median, the first thing

1 still reduce the people who use the sidewalk.

2 MS. CHANG: (Speaking in Korean.)

3 THE INTERPRETER: And also, isn't it a wrong  
4 idea that, you know, the merchants need more space  
5 these days, then the city would cut that space down,  
6 you know, reducing the spaces so the merchant is  
7 suffering from the lack of -- lesser space.

8 MS. CHANG: (Speaking in Korean.)

9 THE INTERPRETER: And I think it's wrong that  
10 this kind of project has been conceived by the people,  
11 and, you know, promoted by the people who are not  
12 directly involved in the business but the people who  
13 are thinking quite ideally.

14 MS. CHANG: (Speaking in Korean.)

15 THE INTERPRETER: Because of this project I have  
16 seen and heard lots of people who have already left  
17 the business section of the Aurora Street and people  
18 who are going to leave there, and also somebody who is  
19 interested in setting up business there but they just  
20 give up because of this project.

21 MS. CHANG: (Speaking in Korean.)

22 THE INTERPRETER: And I -- they agree with me  
23 and I agree with them, you know, we are strongly  
24 opposed to the setting up of median on the Aurora  
25 Avenue.

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1 that came to my mind was the beautiful median that  
2 happens to be on 148th in Bellevue between 24th or  
3 20th or whatever it is going towards Interstate 90.

4 Now, I'm not saying that 148th in Bellevue is  
5 perfect. I'm not saying that what we have designed is  
6 perfect, but I do think that we should take a good  
7 strong look at it and, you know, see what we can  
8 create through different compromises, different ideas.  
9 Just come up with something that's going to look  
10 beautiful.

11 And as far as the businesses along each side of  
12 Aurora, I happen to be a fan of Shoreline history, and  
13 I want to see our businesses, our buildings and so  
14 forth, preserved, but at the same time it must be  
15 recognized that they are old. They're dilapidated.  
16 They're out of date. And if we are going to create  
17 the economic community that we want in our city we're  
18 going to have to put up some new buildings. We're  
19 going to have to put the buildings back from Aurora to  
20 accommodate the -- the new design, as well as fit it  
21 in with the Interurban Trail so that it's a one,  
22 whole, complete unit.

23 And I was a member of the SEPAC committee.  
24 Janet was -- Way was one of the members that was  
25 there, too, back in '95. And I don't know if you were

T-113

Draft Environmental Statement

Page 114

1 there that day, but I'm sure you were. You probably  
2 remember that couple that showed up one Saturday and  
3 they ended up highjacking the whole meeting. She was  
4 from California. She had just gotten married. She  
5 had just moved into the Meridian Park neighborhood,  
6 and she started talking about Aurora and how much of a  
7 garbage dump it was, and was telling us in this  
8 meeting that -- that friends of hers from California  
9 wouldn't even live in Shoreline, let alone buy a  
10 garbage dump, and went on and on. It was just --  
11 everything was so derogatory. And there were a lot of  
12 us at that meeting that just got -- were ready to  
13 throw her out.

14 And that's what I want the citizens of Shoreline  
15 to think about, you know, tonight. We have to get rid  
16 of our garbage dump. It's not necessarily the garbage  
17 dump that some people would like to think it is, but  
18 it's a garbage dump that needs to be improved to  
19 enhance livability, and -- but hopefully within a  
20 general consensus of all opinions, so that we're all  
21 proud of what has been created because we are the  
22 creators of the new Aurora, or as somebody had said  
23 many years ago, right in the beginning of our  
24 incorporation, the future Shoreline Boulevard.

25 MR. DOENNEBRINK: Okay. Anybody else? Is there

Page 115

1 anybody else after her?

2 MS. STEPHENS: My name is Dorothy Stephens. I  
3 live at 17030 Second Avenue --

4 MR. DOENNEBRINK: Could you please be quiet,  
5 please, so we can hear?

6 You'll have to start all over again. I'm sorry.

7 MS. STEPHENS: Okay. I sounded loud to me.

8 MR. DOENNEBRINK: Well, we could hear you, but  
9 not anybody else.

10 MS. STEPHENS: Now can you hear me?

11 MR. DOENNEBRINK: Yes.

12 MS. STEPHENS: Okay. My name is Dorothy  
13 Stephens. I live at 17030 Second Avenue Northwest. I  
14 also have a business on Aurora.

15 I have a question for all of you. Some people  
16 have spoken in favor of Plan A. I would like to pose  
17 a question to you.

18 Imagine that the street in front of your home  
19 has been chosen for redevelopment. The plan calls for  
20 elimination of your front yard. The sidewalk will be  
21 directly adjacent to your front door and your driveway  
22 access will be eliminated. You will have to negotiate  
23 an easement with one of your neighbors.

24 You scrimped and saved to buy your home. You  
25 poured blood, sweat and tears into your home and land.

Page 116

1 And now the city is saying we're doing this to improve  
2 the city. Your suggestions for less intrusive  
3 measures have been rebuffed.

4 How would you feel? What would you do?

5 MR. DOENNEBRINK: Are there any other speakers?

6 I guess we can't officially close this hearing  
7 until 10:00, so --

8 UNIDENTIFIED: We've got one.

9 MR. DOENNEBRINK: Good. We have another  
10 speaker.

11 UNIDENTIFIED: We have another speaker.

12 MR. BEATY: Good evening everyone, and council.

13 My name is Bob Beaty. I live at 185th and -- 117  
14 Northwest 185th Street.

15 And I have attended these meetings a number of  
16 times, and I have proposed this question before the  
17 council and other members of the Shoreline City Works,  
18 if you want to -- if I can say that. I'm trying to  
19 figure out who owns Highway 99 as far as Shoreline is  
20 concerned. Now, this is a state highway. It's always  
21 been a state highway.

22 I don't know what's going to happen if, for  
23 instance, we have a good earthquake. I-5 will  
24 probably go down like it has down in L.A. How are  
25 people going to be able to go through Seattle?

Page 117

1 Seattle is built like a Coke bottle, except the city  
2 of Seattle is right in the middle of the Coke bottle.  
3 This needs some consideration by all people concerned  
4 of Shoreline. I imagine the same thing applies to  
5 people down around Sea-Tac airport.

6 This is a major street. It's state owned, and I  
7 believe it also is federally owned. And I have not  
8 received any question -- any answer to some of my  
9 questions previously. I think we have a serious  
10 problem here, not only with traffic, not only with  
11 businesses. And speaking of businesses, the little  
12 businesses that have formed along Aurora have actually  
13 probably got their business permit a long time ago  
14 when this was just an outgrowth of -- of the Seattle  
15 area.

16 Now, I've lived in this area for 32 years, and  
17 personally I did not vote for Shoreline, and I'm here  
18 saying in front of you that I'm proud that I did not  
19 vote for Shoreline because I feel we were a hell of a  
20 lot better off as we were under the direction of the  
21 Seattle -- or the city of Seattle. And that's my  
22 opinion and I'm here to express it, and I -- I wish to  
23 thank you all for letting me share it.

24 MR. DOENNEBRINK: Thank you.

25 Are there other speakers?

30 (Pages 114 to 117)

1 UNIDENTIFIED: Can I ask something because I  
2 didn't use up my whole time?

3 MR. DOENNEBRINK: Well, we're not allowed to  
4 speak a second time. You can submit it in writing.  
5 That's correct.

6 Anybody else?

7 UNIDENTIFIED: Did you guys want to sing and  
8 dance?

9 UNIDENTIFIED: Okay. Sing a song.

10 MR. DOENNEBRINK: Well, I do want to thank the  
11 audience for respecting the variety of views that we  
12 heard today, and we did hear quite a variety of views,  
13 and this public process, as quite a few of you  
14 mentioned, is what it's all about. So I thank you for  
15 taking your time to show up on a nice sort of summer  
16 day and to stay until almost 10:00. It will be  
17 officially 10:00 in a few minutes. As a reminder --  
18 in case nobody's watching their clock.

19 As a reminder, your written comments are  
20 encouraged and can be submitted at the city offices,  
21 or mailed in, probably faxed in, too, I would imagine,  
22 17544 Midvale North, 98133, through August 16th, 2002,  
23 5:00 p.m.

24 And Planning Commissioners, this is a great  
25 opportunity for you, over the next four minutes, to

1 think about whether you want to have a separate  
2 meeting to discuss this document and whether we want  
3 to do something about it. And Lanie would need to be  
4 notified by a certain date, I would guess, maybe the  
5 end of the week, if we wanted to have a meeting this  
6 month? And --

7 COMMISSIONER PIRO: (Inaudible.)

8 MR. DOENNEBRINK: Written comments should be  
9 left where?

10 UNIDENTIFIED: At the front desk.

11 MR. DOENNEBRINK: At the front desk where you  
12 came in, if you have written comments.

13 And so this either goes to the -- another  
14 Planning Commission meeting, or if they choose to have  
15 such a meeting. Think about it over the next few  
16 days.

17 You like how I'm dragging this out, huh? You  
18 can tell I've done a few broadcasts where I've had to  
19 to do that and where the news is at the top of the  
20 hour and so you had to time it just right, but I don't  
21 have any music to play. So that's the problem.

22 This moves on to the City Council, otherwise,  
23 which, as I recall, is next month. September.

24 Boy, this is sort of like trying to fill time --  
25 I don't have a good joke.

1 The city manager is back there. Do you want to  
2 talk to him? Thank you. Council Member Hansen showed  
3 up. He's back there.

4 (All voices speaking at once. Inaudible.)

5 MR. DOENNEBRINK: The public hearing is closed.

6 (The Public Hearing concluded at 10:00 p.m.)  
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1 CERTIFICATE

2  
3 STATE OF WASHINGTON ) I, Mary Mejlaender, CCR,  
4 ) ss. a Notary Public in and for  
5 COUNTY OF SKAGIT ) the State of Washington,  
6 residing at La Conner in  
7 said county and state, do  
8 hereby certify:

9 That the foregoing Open House Oral Comments and Public  
10 Hearing was taken before me and completed on Tuesday, August  
11 6, 2002, and thereafter transcribed under my direction; that  
12 the hearing transcript is a full, true and accurate  
13 translation of the proceedings, to the best of my ability;

14 That I am not a relative, employee, attorney or  
15 council of any party to this hearing, or a relative or  
16 employee of any such attorney or council, and I am not  
17 financially interested in the said hearing or the outcome  
18 thereof;

19 IN WITNESS WHEREOF I have hereunto set my hand and  
20 seal this 12th day of August, 2002.  
21  
22  
23  
24  
25

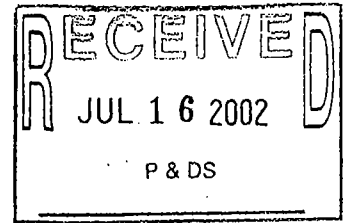
Mary Ellen Mejlaender  
NOTARY PUBLIC in and for  
the State of Washington,  
residing at La Conner.  
My commission expires  
10/2/04.



COPY

Page 1 of 5

Virginia Botham  
16334 Linden Avenue North  
Shoreline, WA 98133  
206-542-7793  
botham@serv.net  
July 15, 2002



Tim Stewart, AICP  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133

Log # 1

Elizabeth Healy  
Area Engineer (NW Region)  
Federal Highway Administration  
711 South Capitol Way, Suite 501  
Olympia, WA 98501  
(360)753-8655

RE: Aurora EIS - N 145<sup>th</sup> - 165<sup>th</sup>

I have read SR99 -Aurora Avenue North Multimodal Corridor Project:  
North 145<sup>th</sup> Street to North 165<sup>th</sup> Street - Environmental Assessment and Draft  
Environmental Impact Statement - July 2002 and would like to become a party of record  
with the following comments.

1-1 Fact Sheet page v lists two alternatives proposed. Page 2-6 Description of Alternatives lists additional alternative examined. I have attended many Aurora meetings and at every meeting a loud request was made for narrower sidewalks, with or without the planting strip. City of Shoreline has refused to consider sidewalks narrower than 7 or 8 feet wide for the length of the corridor in conjunction with D.O.T. required improvements. The Interurban trail parallels the Aurora corridor and will provide an alternate convenient walking area. 7 and 8 foot wide sidewalks are unnecessarily wide; narrower sidewalks should be seriously considered. City Council has promised to allow narrower sidewalks temporarily for existing businesses (until they remodel) to avoid destroying businesses...where appropriate....so this is a promise with no enforcement rights. SMC 20.50.430.C says commercial and residential sidewalks must be at least 5 feet wide so the 7' or 8' sidewalks are not required by Shoreline code.

**SMC 20.50.430.C**

*The pedestrian path from the street front sidewalk to the building entry shall be at least 60 inches (or five feet) wide for commercial and multifamily residential structures, and at least 36 inches (or three feet) for single-family and duplex developments*

1-2 Summary page xviii talks about the demo crosswalk projects at 165<sup>th</sup> and 170<sup>th</sup> and Aurora. Please note that D.O.T. chose to build these demo projects based on a road width different

1-2  
CONT.

that either Alternative A or Alternative B. The end result is loss of bus pull-off so that all traffic southbound must stop behind the bus as passengers load/unload. This slows traffic. I appreciate the crosswalks (I live nearby) but I wish D.O.T. had chosen to provide for a bus pull-off area like we had before the demo crosswalks. When the Aurora Corridor 145-165<sup>th</sup> is built, the crosswalks sidewalk area will need to be re-built to accommodate the new roadway width. Also, southbound at 165<sup>th</sup> there is a concrete curb barrier at the edge of the corner that is invisible at night and inside the expected right turn area. At the very least this dangerous curb should be painted with light colored reflective paint.

1-3

Page xix Summary, Land Use, talks about the minor acquisition of property that will be required. Many of the so-called minor property acquisitions are parking spots that have been used for 50+ years. City of Shoreline does not intend to compensate owners of parking spots in use for decades if those parking spots require backing onto Aurora. If you back into the parking slot, or back onto Aurora from the parking slot, and have done so for decades, and the parking slot is on private property, the parking slot acquisition needs to be paid for. In some cases those parking spaces determine whether or not the business will continue to be viable. These Aurora businesses pay a large percentage of our City's tax income. We cannot afford to consider the throwing away of these long time businesses as the cost of improvement/redevelopment. In this case change would not be improvement if we lose cherished local businesses. I saw 1970s Chicago Urban Renewal failures (boarded up buildings and bulldozed lots that stayed vacant for decades and I would not wish that for Shoreline.

1-4

Part of the Aurora Corridor plan assumes drivers will use the pocket turn lanes for U-turns. I do not consider U-turns on busy Aurora to be safe. Traffic moves too quickly, turning radius is too large, turning is slow, and Aurora has so many access points that it is too easy to be caught in mid-turn by fast traffic. I will not U-turn on Aurora. Instead, I will turn into crowded parking lots and reverse my direction there, or I will use back streets and multiple right turns to get to my destinations on Aurora. I will create additional spill-over traffic into the neighborhoods for safety reasons.

1-5

Page I-4 Purpose and Need of Project refers to LOS of Aurora intersections. The last time I looked at the backup info for our LOS along Aurora was the Shoreline Comprehensive Plan 7/11/98 pages 67,86,87 of the Draft Transportation Element. I listened to many Kirk McKinley presentations and learned that our LOS E average was obtained by averaging LOS along the Aurora corridor and in some cases intersections one and two blocks east or west of Aurora in order to raise the LOS to E from LOS F. The only intersection that showed a LOS D was Aurora/165<sup>th</sup> which counted cars during the early evening commute. Aurora/165<sup>th</sup> heaviest traffic is rush hour A.M. when both workers and Shoreline Community College students flood that intersection. LOS D comes from failing to count cars during the busier A.M. commute but I believe the count was done while school was in session. I believe, based on the preceding, that after the Aurora Corridor is "improved" our LOS will remain LOS F if Ashworth, Linden, Fremont and Dayton intersections are removed from the Aurora Corridor LOS averaging.

1-6 Page I-5 Purpose and Need of Project talks about traffic on Westminster. The Shoreline Comprehensive Plan 7/11/98 repeatedly talks about retiring Westminster Way and using it for commercial development. Has the City of Shoreline decided to keep Westminster Way as a road? Or does it plan to retire Westminster Way after this portion of the Aurora Corridor project has been completed?

Page 2-14 Description of Alternatives says

*The City would explore and consider the possibility of performing certain construction tasks at night to minimize daytime traffic delays and to speed the construction process. Only relatively quiet construction activities would be considered for nighttime.*

1-7 Despite Aurora, Shoreline is a quiet city at night. Summer nights when my windows are open I have been awakened by the night train along Richmond Beach tooting its horn. I live on Linden, 1/2 block from Aurora. RELATIVELY QUIET work at night is not acceptable. According to your own sound studies, Aurora by day is so noisy that you are not worrying about construction noise affecting neighbors. We will be assaulted by jackhammers, asphalt and other obnoxious construction from 7 a.m. till 10 p.m. DO NOT DO ANY NOISE CREATING WORK AT NIGHT. Aurora is bounded by houses and apartments. We deserve to sleep at night just like you do. Sound travels far in a quiet area, and Shoreline is quiet at night. RELATIVELY quiet activities are NOISY activities when performed after 10 p.m.

1-8 Page 3-18 Transportation says 2000 Existing P.M. Peak intersection LOS for 160<sup>th</sup>/Aurora is LOS C whereas elsewhere it says LOS D. I know that when I asked Kirk McKinley during the Comprehensive Plan 98 Public Hearings that the 160<sup>th</sup> car counts were originally done at 1-2pm or 2-3 pm, or very early evening "commute" time. I believe the LOS C on page 3-18 for Aurora/160<sup>th</sup> is an error. The Shoreline Comp Plan page 86 shows a 1996 LOS D for Aurora/160<sup>th</sup>.

1-9 Page 3-20 Transportation talks about Cumulative Transit Impacts. This paragraph assumes that the BAT lanes will be used by increased numbers of buses. I hope the BAT lanes will be well and heavily used. But I fear they will not, because too much of the transit money will be spent on Whoops on Wheels, the trolley car to nowhere, otherwise known as light rail. Our public transit money is being wasted on a light rail project that will not improve traffic and heavy use of our BAT lanes by buses would. I fear we are building BAT lanes for buses we won't be able to afford to run because our money will already be spent.

Page 3-26 Land Use says:

1-10 *Direct land use impacts were considered substantial if the amount of land acquired by the alternative would represent a substantial percentage of loss of a particular land use type in the City.*

This narrow definition excludes any meaningful definition of substantial. My definition of substantial impacts would relate to how many businesses were forced out, or lost too much

1-10  
CONT.

4015  
parking to function successfully. I would be looking at business loss, and tax receipts eliminated or decreased to the City. These substantial aspects are not examined.

Page 3-27 says

Both build alternatives would require landform grading and filling; however, no sensitive areas would be impacted nor buildings demolished.

A table at the back of the EIS lists businesses that must move and lose their locations. I assume those businesses are in buildings that will be demolished. The table beginning on page 3-120 (Table 3-39) lists removal/demolition. Is my assumption incorrect? The table lists the following removal/demolition businesses:

1-11

Kym's Kiddie Corner 17512 Aurora  
Seattle's Finest Exotic Meats - 17532 Aurora  
Monarch Appliances - 18400 Aurora  
Spiro's Pizza Pasta - 18413 Aurora  
A World of Collections - 18419 Aurora  
MacPherson's Property Management - 18510 Aurora  
Top Tattoo - 19918 Aurora  
Aurora Rents - 17244 Aurora

Page 3-28 says again "no buildings would be demolished" but I suspect these references are referring only to 145-165 Aurora. It appears this EIS sometimes talks about the entire Aurora Corridor and sometimes talks only about 145-165 Aurora.

Page 3-56 says

The utility companies would pay for the service undergrounding up to the right-of-way, at which point the service undergrounding cost would be the responsibility of the property owner. These conversions would be negotiated with the property owners.

1-12

In the past few years I've been reading in local newspapers about utility companies fighting paying for service undergrounding. And Safeway (155<sup>th</sup> & Aurora) recently avoided a code-required utility undergrounding in a remodel. ARE YOU SURE THE UTILITIES AND PROPERTY OWNERS WILL BE PAYING FOR THE UNDERGROUNDING? If the City of Shoreline were to end up paying for the undergrounding, what would it cost the City? For the 145<sup>th</sup>/165<sup>th</sup> portion? For the 165<sup>th</sup>/205<sup>th</sup> portion?

1-13

Page 3-63 and 3-64 lists mitigation measures. City staff have been interested in changing the Shoreline Municipal Code to make sign laws more restrictive. In order to keep our businesses profitable during the projected 18 months of construction for 145<sup>th</sup>/165<sup>th</sup>, I believe mitigation should include special sign relief so that businesses can inform customers they are still open for business. I believe we should encourage these endangered businesses to add to their signs while Aurora is being re-built.

Page 3-86 says

5 of 5

If construction must occur at night to avoid conflicts with traffic on Aurora Avenue North then a noise variance must be obtained from the City of Shoreline.

1-14

I believe the neighborhoods deserve quiet between 10 pm and 7 am and believe that City of Shoreline should NOT grant a night noise variance under any circumstances. Quiet cleanup/prep could be considered during night hours but any variance should require a public hearing with leafleting to all neighborhoods affected. Remember, sound travels....especially during the quiet hours of night.

Page 3-107 says of secondary impacts:

1-15

*Redevelopment would not be directly induced by the project itself. Growth is caused by estimated future population increases, which are determined and directed by the Puget Sound Regional Council agency under the Growth management Act (GMA) and the City's Comprehensive Plan and zoning plan.*

I believe the above is an overstatement. PSRC and GMA can plan and project growth all they want. Growth is triggered by people making individual decisions about economics and personal life choices. Growth occurs when it makes financial sense, or when birth control fails. Growth is not caused by estimates of anything. Planners plan. Planners do not create. Sometimes plans are pretty accurate and desirable and sometimes they are not (failed Chicago Urban Renewal 1970; population growth projections for metropolitan Seattle from the 1960 for 2000 are still unmet).

The test of good planning is how it's received. If you lead people where they want to go, they willingly follow. If you lead people where you think they ought to want to go and they don't want to go there, you may find yourself standing alone.

Sincerely,

  
Virginia Botham



## Ronald Wastewater District

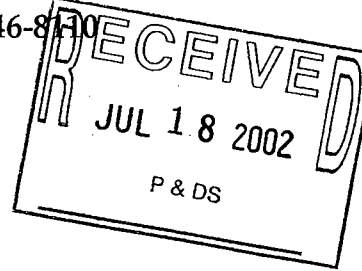
17505 Linden Avenue North • P.O. Box 33490  
Shoreline, Washington 98133-0490  
(206) 546-2494 • Fax (206) 546-8110

COMMISSIONERS  
Gary F. Shirley  
Arnold H. "Arnie" Lind  
Arthur L. Wadekamper

GENERAL MANAGER  
Philip J. Montgomery

July 17, 2002

COPY



Log # 2

Tim Stewart, AICP  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133

Subject: Aurora Avenue North Multimodal Corridor Project:  
North 145th Street to North 165th Street  
Draft Environmental Impact Statement

Dear Tim:

Ronald Wastewater District thanks you for allowing us the opportunity to review and comment on your proposed Aurora Avenue North Multimodal Corridor Project referenced above. The project description sounds feasible and appears it could be beneficial for the region. There were a few points in regard to the document that we would like to make comment:

2-1 The most important issue to the District was identified under **Mitigation Measures, Services** (page 3-47) - *Interruptions to utility services would be minimized by coordinating the relocation of utilities with the contractors' schedules and by notifying customers in advance of any service interruptions. Measures would be taken to ensure that existing pipelines are adequately protected against potential adverse effects of the settling that might result from compaction. For utility lines that must be rerouted or relocated, the City and the contractors will work with the affected utility company to coordinate the necessary modifications.*

The sewer lines along Aurora Avenue North were installed along the outer edges but in the existing right-of-way between 1958 and 1960. These areas were not in the actual roadway and compaction may not be up to today's standards in these areas. Compaction testing and modifications to roadway design may be required in these areas and should be identified at an early stage of the project.

2-2 **Project Alternatives, both Alternatives A & B** (page 2-10)- no mention was made of existing underground utilities other than stormwater. Sanitary sewer lines, often referred to as the "invisible assets" of a City, often times go unnoticed. While we, as a District, pride ourselves in having the general public not to have to think about the sanitary sewer system, we believe it important that you identify the presence of existing underground utilities, including sanitary sewers.

2-3 **Mitigation Measures, Construction staging area** (page 3-22)- The District would like to participate in the discussions related to where and how to stage construction, especially as it impacts our sewer facilities.

**Working for Environmental Protection**

A special purpose district formed pursuant to RCW chapter 57

**Affected Environment, Services (page 3-39)-** The District provides services north of 153rd Street for this project. The existing sewer trunks are located within the right-of-way of Aurora Avenue and will be impacted if the right of way is expanded.

Specifically, it appears that the sewer will be impacted by the proposed project at the following intersections along Aurora Avenue North:

2-4 @ 145th Street - the sewer begins approximately 90 feet to the west of the existing right-of-way, and continues west. Construction impacts may occur if traffic is routed along this route.

@150th St. and 152nd St. - no sewer is located within these intersections.

@155th St. - The sewer was installed in 1961. MH G-72 is located within the intersection.

@160th St. - Sewer is located along both sides of the street. MH G1A to MH G1 actual traverse east/west across the intersection. They were installed in 1958. MH G1 to MH F2 (going south on the west side of Aurora Avenue North) may be impacted by the design. From 160th Street North to nearly 167th St North, sewer trunks are located on the west side of the road MH G1-MH D-68. Sewer is located along the east side of the road from MH G1A to MH G2A.

Enclosed please find a copy of our service area map which identifies the manhole locations of the above identified manholes. We will be pleased to share our as-built information with you regarding these sewer lines and would like the opportunity to participate in the alternative selection process so that we can assist with this project as much as possible.

Sincerely,

  
Philip J. Montgomery  
General Manager

Enclosure

July 30, 2002

James E. Alexander  
17616 Evanston Ave. No.  
Shoreline, WA 98133

JUL 31 2002

SEPA Official  
17544 Midvale Ave. No.  
Shoreline, WA 98133-4921

**Log # 3**

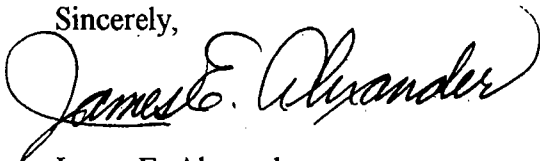
To whom it may concern:

My comments on Shoreline's Aurora Corridor "improvements" will not be viewed as positive by your committee and my letter will likely find its way to the trash barrel. However, I speak for a number of people who share similar concerns. I apologize for being so blunt but I would never want you to misconstrue any thing I say about this project as being positive.

- 3-1 | This is a perfect example of government run amok. The cost is ridiculous. I cannot see where this process will make traffic move smoothly when lights are installed. They will impede the natural flow of traffic. Pedestrians may use the lights as a way to get across Aurora if they happen to intersect Aurora at a signal but they will not walk several blocks to get to the light. Jaywalking will continue as it always has. The Aurora Corridor has
- 3-2 | very few pedestrians. This project will eliminate several stores along Aurora and the result will be a greater distance from one business to another. This too will help to lessen the number of pedestrians that you are apparently attempting to entice to the area. The
- 3-3 | plantings in the middle of the street make the lanes deviate from a straight line. The lanes
- 3-4 | are pushed over so far in the area of the Old Country Buffet that it almost becomes a drive through.
- 3-5 | I do not understand why you are inviting input from citizens when the project is well under way. I suppose it is so you can say: "We had input from the community". I am aware of the opposition this project has gotten from a number of business concerns along Aurora. Their input has been negative toward the project.

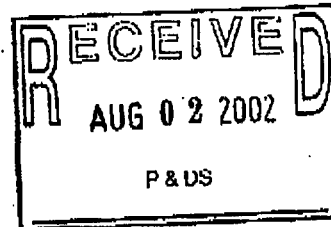
I have always maintained that when a politician and an architect get together the result is the building a monument to themselves. You again prove my worst fears.

Sincerely,



James E. Alexander





July 31, 2002

Log # 4

Aurora Corridor.  
Responsible SEPA Official  
City of Shoreline  
17544 Midvale Ave. N.  
Shoreline, WA 98133-4921

To Whom It May Concern:

4-1 | In regards to the proposed improvements in Shoreline on Highway 99 between N. 145<sup>th</sup> and N. 165<sup>th</sup>, we feel to spend over 21 million dollars per mile is unreasonable use of taxpayers money.

It was our understanding when Shoreline was incorporated it was being done to protect us from excess taxes that were going to be taken by other municipalities and appropriated for their indiscriminate use. We would encourage you to reconsider the wishes of the community in this regard.

4-2 | We do business in that area and do not see that a great deal of improvements need to be made. The upgrades that we can visualize are those that should be handled by the business owners to improve the appearance of their property and convenience of access for their customers.

4-3 | We would be interested in using tax dollars only for improvements that can be shown to be necessary for reasonable safety, i.e. crosswalks, and stop lights.

4-4 | A better use of some of the money might be investing it in improvements of the parks in Shoreline.

4-5 | Shoreline certainly consists of more than just a few blocks of Aurora Ave. and if we are going to spend 21million dollars on that small area, many of the rest of Shoreline's needs will go wanting. Is that what we want?

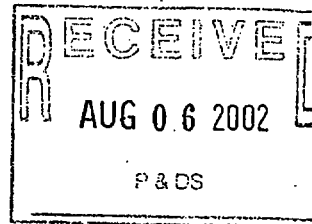
Respectfully,

*M. Michael Miller*  
*Patricia J. Miller*

M. Michael Miller  
Patricia J. Miller  
2345 N. 149<sup>th</sup> St.  
Shoreline, WA 98133



Log # 5



CITY OF  
**SHORELINE**

**AURORA CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET

Aurora Avenue 145-165 Open House August 6, 2002

General Public Comment Form -- Not for EIS

Name JACK AUBREY

Address 16124 MIDVALE AVE N

Phone (206) 542 2284

Comments:

- S-1 | WHILE CONSTRUCTION IS GOING ON - WHAT ARE YOU  
GOING TO ADDRESS AS TO TRAFFIC ON SIDE STREETS  
SUCH AS DAYTON AND MERIDIAN, ALSO WITH THIS  
PROJECT ONLY GOING TO 165<sup>TH</sup> - WHAT ARE YOU GOING  
S-2 | TO DO TO ADDRESS THE BOTTLENECK AT 165<sup>TH</sup> AND  
THE TRAFFIC THAT WILL SURELY OCCUR ON  
DAYTON AND MERIDIAN - BY CREATING ONLY  
ONE LANE ACCESS TO WESTMINSTER WAY THERE  
S-3 | WILL BE WORSE BOTTLENECK AT 155<sup>TH</sup> + AURORA AND  
THE INTERSECTION OF WESTMINSTER WAY + 155<sup>TH</sup>

- S-4 | ~~NOTE~~ NOTE! BY CREATING RESTRICTIVE  
TRAFFIC FLOW ON TURNS AND SPEED REDUCTIONS  
ON AURORA, TRAFFIC WILL NORMALLY FLOW TO  
DAYTON + MERIDIAN

- S-5 | BY CREATING NEW SIDEWALKS YOU DO NOT  
CREATE PEDESTRIANS

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

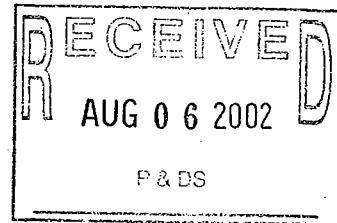
Comments must be received no later than Friday, August 16, 2002 5 p.m.



CITY OF  
**SHORELINE**

**AURORA CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



Log # 6

**Aurora Avenue 145-165 Open House August 6, 2002**  
**General Public Comment Form -- Not for EIS**

Name MARYANN HELFERTY

Address 3214 160 Place  
Shoreline WA  
98133

Phone ( ) \_\_\_\_\_

**Comments:**

6-1 I support Alternative A because it will improve the livability & business climate in my neighborhood. It will

1. increase pedestrian safety
2. Promote faster trips for public transit
3. support neighborhood beautification by providing a more enjoyable streetscape. Eventually more businesses that serve pedestrians will move to a safer Aurora.

Thank You.

Please leave your comments with us tonight or mail your comments to:  
Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921  
Comments must be received no later than Friday, August 16, 2002 5 p.m.

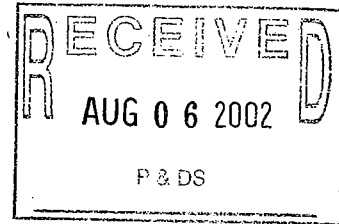


CITY OF  
**SHORELINE**

**AURORA**

**CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



Log # 7

**Aurora Avenue 145-165 Open House August 6, 2002**  
**General Public Comment Form -- Not for EIS**

Name Sally Granger

Address 16804 16<sup>th</sup> NE  
Shoreline, WA  
98155

Phone ( ) \_\_\_\_\_

Comments:

7-1 | Do not agree with left hand  
turns and U-turns. "No Way"  
12' sidewalks and bus lanes  
are great!!

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

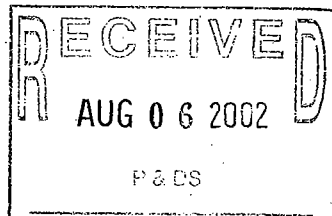
Comments must be received no later than Friday, August 16, 2002 5 p.m.



CITY OF  
**SHORELINE**

**AURORA CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



Log # 8

Aurora Avenue 145-165 Open House August 6, 2002

General Public Comment Form -- Not for EIS

Name LARRY WHEATON

Address 15030 AURORA  
SHORELINE WA.

Phone (206) 730.4635

Comments:

8-1 | THIS PROJECT WITHOUT A LEFT TURN  
INTO GOLDIES CASINO AND A TWO YEAR  
WINDOW ON COMPLETION WILL NOT ONLY  
DEVISTATE OUR BUSINESS BUT MAY PUT US  
OUT OF BUSINESS.

GOLDIES PAYS OVER \$800,000 IN TAXES  
TO THE CITY OF SHORELINE AND EMPLOYEES  
163 EMPLOYEES.

THIS PROJECT HAS TO BE STOPPED.

WE HAVE TO COME UP WITH ANOTHER  
IDEA THAT WILL WORK FOR EVERYONE.

8-2 | IF THIS GOES THOUGH THE CITY OF  
SHORELINE WILL SEE MORE SMALL BUSINESS  
GO UNDER THEN THEY CAN EVERY FORSEE.

THANKS

LARRY WHEATON

GENERAL MANAGER

GOLDIE'S SHORELINE CASINO

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

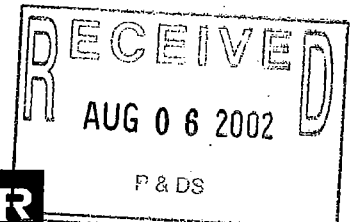
Comments must be received no later than Friday, August 16, 2002 5 p.m.



CITY OF  
**SHORELINE**

**AURORA CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



Log # 9

**Aurora Avenue 145-165 Open House August 6, 2002**  
**General Public Comment Form -- Not for EIS**

Name Marcie Redinger  
Phone (206) 546-2582

Address 19023 Wallingford N.  
Shoreline WA 98133

Comments:

9-1 | I support Plan A.

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

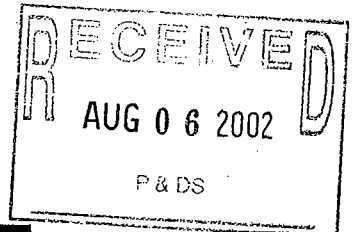
Comments must be received no later than Friday, August 16, 2002 5 p.m.



CITY OF  
**SHORELINE**

**AURORA CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



Log # 10

**Aurora Avenue 145-165 Open House August 6, 2002**  
**General Public Comment Form -- Not for EIS**

Name Celia M. Kerr

Address 1300 N. 167<sup>th</sup> St.  
Shoreline, WA 98133

Phone (206) 546-9549

Comments:

- 10-1 I agree with the testimony of members of Concerned Citizens of Shoreline that the impact to our neighborhood adjoining 99 and this project will be enormous and negative. A rtolight at N. 165<sup>th</sup> will increase traffic in our neighborhood, obviously on N. 165<sup>th</sup> but also on my street, N. 167<sup>th</sup>. We are participating now in the City of Shoreline's Neighborhood Traffic Safety Program, trying to jump through the numerous hoops to try and get traffic slowed down and blocked from our street. N. 165<sup>th</sup> needs the same help, but instead you want to put in a street light! You will ~~then~~ encourage more traffic in our neighborhood, on both 165<sup>th</sup> and 167<sup>th</sup> St. There will be terrible air
- 10-2 pollution from the construction: dust, dirt, diesel from the heavy trucks & equipment, as well as car emission pollution from backed-up traffic. The
- 10-3 noise pollution will be terrible as well. Both of these are unacceptable and won't they violate the noise ordinance of our city?
- We need mitigation - physical barriers - on 165<sup>th</sup> and 167<sup>th</sup> St. We need the City to respect and protect our neighborhood. What about us? → continued →

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

Comments must be received no later than Friday, August 16, 2002 5 p.m.

I would like to know who in the City of Shoreline will be looking at the coordination of and overlapping of the three major projects related for the corner of my street, N. 167<sup>th</sup>, and 99: the Aurora Corridor project for N. 158<sup>th</sup> to N. 178<sup>th</sup> st., the Interurban bike trail and the proposed Hollywood Casino, next door to the Drift on Inn? Someone, the City Manager and the Shoreline City Council, must consider the huge impact that these three major projects will have on our street, our neighborhood, our property values, our quality of life. It will be devastating - all negative. This is wrong and unfair. I ask for equal consideration & protection - mitigation for we residents of Shoreline's Meridian Park neighborhood.

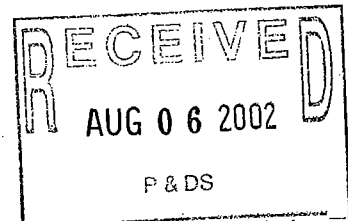




CITY OF  
**SHORELINE**

**AURORA CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



Log # 11

**Aurora Avenue 145-165 Open House August 6, 2002**  
**General Public Comment Form -- Not for EIS**

Name LES NELSON

Address 15340 Stone Ave N  
Shoreline, WA. 98133

Phone (206) 365-4123

Comments:

- 11-1 | Object to addition of TRANSIT ONLY lanes.  
• these create unsafe hazard for getting out of businesses along Aurora.  
• Are not needed South bound.  
• Will NOT decrease vehicle congestion as lanes are for TRANSIT ONLY !!

- 11-2 | I also object to breaking the EIS into parts.  
This is contrary to state law regarding producing an EIS.

Please leave your comments with us tonight or mail your comments to:  
Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921  
Comments must be received no later than Friday, August 16, 2002 5 p.m.

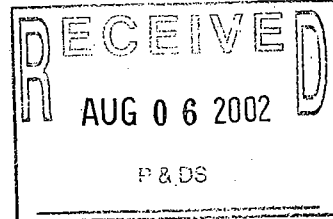


CITY OF  
**SHORELINE**

**AURORA**

**CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



Log # 12

Aurora Avenue 145-165 Open House August 6, 2002

General Public Comment Form -- Not for EIS

Name TOM Maddy

Address 15205 Aurora AVE N  
Seattle, Wa. 98133

Phone (206) 364-3300

Comments:

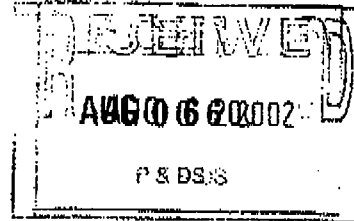
- 12-1 I oppose the Aurora Corridor project. A & L  
~~No left turns~~ means too much lost business.  
A lot of our business comes from south  
of 145th
- 12-1 A lot of business will be lost to Seattle  
and Snohomish County with the center  
median and no left turns
- 12-2 8 foot wide sidewalks will never be needed!!!  
there will never be enough pedestrians!!!
- 12-3 I oppose alternative A and B

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

Comments must be received no later than Friday, August 16, 2002 5 p.m.

DEIS Open House and Public Hearing  
Tuesday August 6, 2002  
Verbal and Written Presentation



**Log # 13**

*Let me start my presentation by reviewing facts that some people may have ~~been~~ forgotten.*

13-1 | In August of 1999 The Aurora Concept was born. This concept was the result of an extensive, fair, and open process. Each and every citizen, and yes, each and every merchant had an equal opportunity to express their views, their opinions, and their hopes for what Aurora - OUR Main Street needed to become.

Every view, and every suggestion was heard - often times very loudly, and considered. Many of these ideas became part of the Aurora Concept. Some were not. That's the way it is. *Most people in our city understand that you can't always have everything your way.*

**Three years wasted** - We have had three years of delays thus far. I would like to take a few moments to speak first of the cost of the delays to date. Then I will speak about the cost of further delays.

**Inflation Costs** - We lose an estimated \$1 million per year due to inflation. Remember - Grants are for fixed amounts - they don't increase at the rate of inflation. It's money gone forever.

**Societal Costs** - These have been estimated at \$10 million per year for our 3 mile stretch of Aurora! There are many accidents each and every year - and the two way left turn lane is a major reason. Our section of Aurora is one of the most dangerous stretches of road in the state of Washington. This was stated recently at a Community meeting by WASDOT Secretary Doug McDonald.

Other cities and states with roads similar to our stretch of Aurora report that replacing two way left turn lanes with raised medians, with cut outs for business access and u turns, eliminates nearly half of the accidents, nearly cuts in half vehicle injury rates - and cuts pedestrian fatality rates - by nearly 80%.

Page one

Keeping things the way they are is costing us ~~\$8~~<sup>5</sup> million per year – every year!

**Businesses that we want** - Wouldn't it be great to have a thriving and vibrant Aurora Ave running thru our city? Our stretch of Aurora is not something to be proud of. So many empty lots, empty buildings, and run down and unattractive businesses. A redeveloped Aurora will be the impetus for much needed change and improvements.

Sadly, Underhills Furniture is closing it's store in Shoreline. I suspect that the many delays have disillusioned the owner, and were part of the decision to leave. With it go tax revenue, as well as a good local business. We must move forward now – to keep good businesses – and create an atmosphere and climate that will attract new businesses.

Starbucks and Sundae's Ice Cream Shop have recently become tenants of the old KFC building on the West side of Aurora between 200<sup>th</sup> and 205<sup>th</sup>. What a pleasant addition they are to our community. All in a stretch with a raised median!

If you do the math – the delays have already cost \$15 million at the very least. **How?** - 3 years of losing \$1 million to inflation, and \$4 million in Societal Costs. This doesn't consider revenue - as businesses leave – and missed opportunity – as new businesses locate elsewhere – because a group of Merchants that claims to represent the majority of businesses on Aurora has done, and continues to do, everything that it can to sabotage this project.

It costs us \$5 million a year – at least – every year that we delay. Let's stop the delays – and let's follow the will of the majority – let's get started – transforming Aurora ~~into~~<sup>into</sup> our true Main Street.

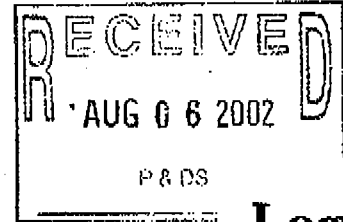
Thank you for your consideration,

Jim Shea  
16309 Interlake Ave N  
Shoreline WA 98133  
206-819-3300

Page two

CITY OF  
**SHORELINE****AURORA****CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET

Log # 14**Aurora Avenue 145-165 Open House and Hearing 8/6/02**  
**Public Comment Form**Name Les NelsonAddress 15340 Stone Ave N.  
Shoreline WA 98133Phone (206) 365-4123**Comments on the EA/Draft EIS:**

14-1 | EIS needs to include the entire project from 145th to 205th. Breaking this "project" into segments is a violation of State Law, as the entire plan must be presented in total in order for someone to make an informed decision.

14-2 | I also disagree with the need for additional lanes for transit as the benefit provided for a single hour of Northbound traffic does not justify the cost. Justification for Southbound BAT is not provided, and is only useful to allow for U-turns.

14-3 | Transit ONLY lanes are a safety hazard for vehicles leaving businesses. This has been proven out in Seattle.

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

53



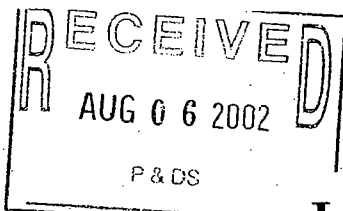
CITY OF

SHORELINE

AURORA

CORRIDOR

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



Log # 15

## Aurora Avenue 145-165 Open House and Hearing 8/6/02

### Public Comment Form

Name Tenet WayAddress 940 NE 147th St  
Shoreline, WA 98155Phone (206) 365-4477

I represent Thornton Creek Legal Defense Fund +  
Comments on the EA/Draft EIS: Paramount Park Neighborhood Group.  
I am skeptical of this plan!

I have <sup>concerns</sup> with the following issues regarding the environ-  
- additional runoff possibilities + impervious surfaces  
- adverse impacts to wildlife from new impervious surface  
especially on Endangered species, threatened + Priority spec  
- concerns about pollutants  
- cumulative impacts to salmon + other fish +  
cumulative impacts to neighborhoods  
- cumulative impacts on small businesses

I support true sustainable development, but only that  
which provides water + air quality improvement.  
Sustainability does not sacrifice the environment or neighborhood.

15-1 I believe many citizens have proven that 15th Ave NE  
has a far greater safety problem than Aurora.

I see the Aurora Corridor project as a potentially destructive  
concept but if it were modified it might become beneficial  
IF the city would truly listen to those affected by the proposal.

Overall, I believe the Aurora Corridor Proposal is not  
fully thought out regarding its potential impacts to  
the environment + the community. Thornton Creek

15-2 MUST receive documented water quality improvement, by 2005  
before this project can ever proceed (over)

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

Comments must be received no later than Friday, August 16, 2002 5 p.m.

~~various ungulates~~ - clunook, coho, sockeye, cutthroat, rainbow trout,  
steelhead,  
River otter, Great Blue Heron, Beaver, muskrat, Pileated Woodpecker, Red Tail Hawk,  
Bald Eagle, Peregrine Falcon, Sharpshinned Hawk, Barred Owl,

Include by reference-

- Shoreline Corps Plan
- N M F S 4-D rule.
- "Thornton Creek Watershed Characterization Report"  
THOR. Watershed mgmt. Committee
- "Basin-wide Flow Study for Thornton Creek or  
"Entrance Report"
- Shoreline Critical Areas Amendments proposal  
(before planning Commission July 11,

Respectfully Submitted,

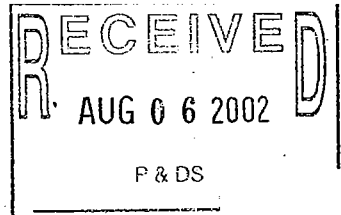
Janet Way



CITY OF  
**SHORELINE**

**AURORA CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



Log # 16

**Aurora Avenue 145-165 Open House and Hearing 8/6/02**  
**Public Comment Form**

Name VIRGINIA BOTHAM

Address 16334 LINDEN N  
SHORELINE WA 98133

Phone (206) 542-7793

**Comments on the EA/Draft EIS:**

- 16-1 1) It is my understanding after reading the Aurora Corridor DEIS (long version) that all collected surface water will eventually end up in Shoreline streams. Although the water will first go through concrete retention vaults, it will eventually end up in salmon streams. Is this legal? Is this good for the fish? Concrete vaults will change the water's PH.
- 16-2 2) I strongly oppose night work on this project for any reason. 7 AM to 10 PM is more than adequate (it is excessive!) for roadwork on an arterial abutting residential neighborhoods. Let us sleep after 10 PM. PROJECT IS EXPECTED TO LAST 18 MONTHS.
- 16-3 3) Current sign ordinance is too restrictive for businesses while construction is occurring in their vicinity. IMPACTED BUSINESSES NEED TO BE ALLOWED TO PUT UP/OUT ADDITIONAL SIGNS / ROOFTOP BALLOONS, BANNERS.
- 16-4 4) EIS SHOULD COVER 145th to 205th, NOT JUST ONE SMALL SEGMENT.

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

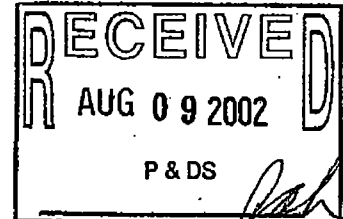
Comments must be received no later than Friday, August 16, 2002 5 p.m.



Log # 17August 9<sup>th</sup>, 2002

Kellie A. Swenson  
2308 North 149<sup>th</sup> Street  
Shoreline, WA 98133  
206-367-1396

City of Shoreline  
Tim Stewart, AICP  
17544 Midvale Avenue North  
Shoreline, WA 98133



Dear Mr. Stewart:

17-1 I would like to thank you and your staff for working so hard on the Aurora Corridor Project, the open house on August 6<sup>th</sup> was impressive. I support Alternative A since it provides beauty as well as functionality. I believe sidewalks open up businesses to the disabled. Currently our disabled community has very little access along Aurora Avenue and with sidewalks they can safely traverse it and enjoy the benefits as those who ride in cars.

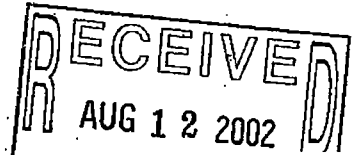
Certain groups have compared our section of Aurora Avenue to Lynwood's section of Aurora Avenue and there is one big difference between us, the majority of our businesses are along Aurora Avenue. Lynwood's business district centers on Alderwood Mall, which is landscaped and has sidewalks. I want to attract business to Shoreline not turn it away because of lack of pedestrian accessibility and aesthetics.

Sincerely,

Kellie A. Swenson

CITY OF  
**SHORELINE****AURORA CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



P &amp; DS

Log # 18

## Aurora Avenue 145-165 Open House and Hearing 8/6/02

### Public Comment Form

Name TOM Maddy

Phone (206) 364-3300

Address 15205 Aurora Ave  
Seattle, Wa. 98133

**Comments**

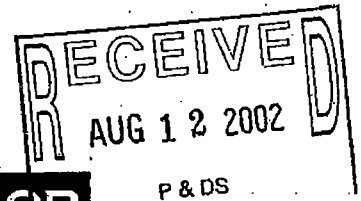
- 18-1 I oppose Alternative A and B. much of our business comes from south of 145th. No left turns means loss of business with the center median.
- 18-2 The center median will cause too much business to flow out of Shoreline resulting in loss of tax revenues for the city. Also emergency vehicles may not be able to get to needed locations. Seattle and Edmonds will benefit!!
- 18-3 8 foot wide sidewalks will never be needed. There will never be enough pedestrians on Aurora to justify 8 foot sidewalks.

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

CITY OF  
**SHORELINE****AURORA****CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



Log # 19

**Aurora Avenue 145-165 Open House August 6, 2002**  
**General Public Comment Form -- Not for EIS**

Name Keith B. Cottingham Address 350 NW 175 ST  
Seattle WA  
 Phone (206) 546-3030 98177  
At August 6, 2002 ~ Aurora Corr Hearing.

Comments:

- 19-1 ① You really screwed up by not doing the complete EIS from N. 145 to N. 205
- 19-2 ② Your "divide + conquer" approach to issues that cannot be separated into 145-165 makes a meaningless and confusing project.
- 19-3 ③ The cost of 30 million dollars per mile in Shoreline is extremely expensive and not in keeping with good sound economics or engineering.
- 19-3 ④ The project should pay more attention to improving capacity of the highway, improve safety to drivers and pedestrians and pay less attention to URBAN RENEWAL, which should not receive \$'s under the cloak of improving capacity and safety.
- 19-3 ⑤ Start paving asphalt shoulders of 3' to 8' wide, label them as sidewalks, add raised markers to separate and use some of the reduced Aurora money to make ALL of Shoreline a Pedestrian safe area to walk, day/night!

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

CITY OF  
**SHORELINE****AURORA CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET

Log # 20

RECEIVED

AUG 12 2002

P &amp; DS

Aurora Avenue 145-165 Open House and Hearing 8/6/02

Public Comment Form of August 6, 2002

Name Diane CottinghamAddress 350-NW-175Phone (206) 542-9332Sea Wa  
98177Comments on the EA/Draft EIS:

- 26-1 (1) With BAT lanes & 5 other lanes we now have, how does the A1A or A1B improve capacity on Aurora - ?  
(no addressed in DEIS)
- 26-2 (2) Isn't \$30 million per mile far in excess of Value Engineering recommendations?  
(Not addressed in DEIS)
- 26-3 (3) Do wider sidewalks 12' or 8' or 5' have anything in common with safety? What source of info -  
(Not covered in DEIS)
- 26-4 (4) How can capacity be improved with addition of traffic signals which is contrary to WAC 468?
- 26-5 (5) How can the raised median be required when WAC 468 states that CLASS 4 highways can have existing or planned "NON RESTRICTIVE MEDIAN"?  
The DEIS misstates the requirement of the WAC  
(Not correctly analyzed in the DEIS)
- 26-6 (6) Would not a widened Aurora with sidewalks and TWLTL fit within the existing R/W, 7 lanes, at far less cost?  
(not addressed in DEIS)

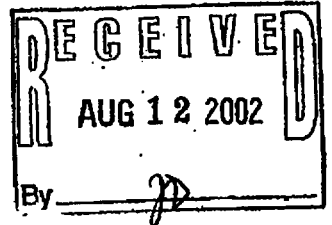
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Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

Log # 21

Mr. Aubrey L. Sansini  
 1562 NE 177th St #21  
 Shoreline WA 98133  
 (206) 363-3428



City of Shoreline

ATTN: Aurora Corridor SEPA OFFICIAL,

I am not in favor of any money  
 spent on the Aurora Corridor PROJECT. Instead,  
 spend this money on building new swimming  
 pools with saunas & jaccuzzis. You can  
 build a new Senior/Community Center with  
 a large dance floor say for square dancing.

Put more money into the local  
 police. DO NOT START THIS PROJECT.

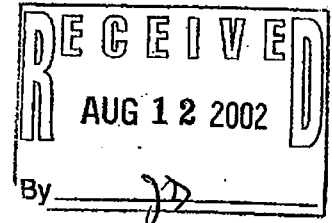
Sincerely

Aubrey L. Sansini

8/12/02

**Log # 22**

August 3, 2002



Aurora Corridor Responsible SEPA Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133-4921

Dear Sir or Madam:

22-1 | I served as the chairperson of the Aurora Pre-Design Citizens Advisory Task Force. This committee was made up of representatives from business, the Shoreline Chamber of Commerce, neighborhood groups, and community activists. Early on in our meetings it became clear that the overriding concern of the group was for pedestrian safety and the safety of occupants in vehicles as more and more cars took to this corridor in the future. Our first meeting was on December 10, 1998 and our committee generally met every two weeks. During each of these meetings, the public was given an opportunity for input. Between the bi-monthly meetings the community had the opportunity to view other communities, talk to people in our own community, and hold community Open Houses. By August of 1999, the committee had arrived at a consensus that **Alternative A** was in the best interest of the citizens and business owners in Shoreline and presented their proposal to the Shoreline City Council, where it was unanimously approved.

22-2 | **I am writing this letter in support of Alternative A.** The task force committee members felt it was very important that a four-foot amenity strip be provided between vehicular traffic and pedestrians walking along Aurora. The members considered it extremely dangerous to have cars and buses traveling between 30 and 40 miles an hour next to pedestrians walking along the roadway. This four-foot amenity strip would provide some space between the pedestrians and the vehicles. Opponents to this alternative will state that no pedestrians use Aurora. But, that is not true. We have video documentation and statistics of accidents that show that not only do pedestrians walk along this roadway; they get hit and killed along this roadway. Buses traveling along Aurora pick up and drop off numerous riders every day who currently run the risk of being hit. Many of these riders attempt to cross Aurora only to find that this, too, is very dangerous. The task force did not believe that a narrower sidewalk would provide adequate space for lighting, signage and other amenities to be placed in the travel portion of the sidewalk. The task force considered ways to move people from one side of the roadway to the other and provide a safety zone in the median for those individuals who could not make it safely across during one light change. I urge your support of Alternative A.

To approve Alternative B after the community and City Council has already established their support of Alternative A would be to ignore the democratic process and allow special interest groups to control the destiny of projects like the Aurora Corridor.

Sincerely,

A handwritten signature in cursive script that reads "Harley D. O'Neil, Jr.".  
Harley D. O'Neil, Jr.

*City of Shoreline*

17544 Midvale Avenue North  
Shoreline, Washington 98133-4921  
(206) 546-1700 ♦ FAX (206) 546-2200

November 3, 1998

Harley O'Neil Jr.  
17844 8th Avenue NW  
Shoreline, WA 98177

Re: Aurora Pre-Design Citizens Advisory Task Force

Dear Mr. O'Neil Jr.:

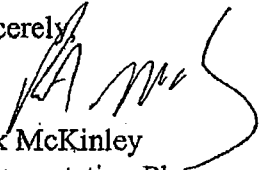
I would like to thank you for applying to serve on the Aurora Pre-Design Citizens Advisory Task Force (CATF). We received a total of 36 applications; a larger number than we expected. City staff were very impressed by the level of effort by all in filling out the applications, and with the obvious interest and enthusiasm of the community for this study process. Coming up with a recommended list for the Council to consider for appointment was not an easy task.

I am pleased to inform you that you have been appointed to this committee by the City Council on Monday, October 26. The membership list and agenda for the first meeting is enclosed.

Please mark your calendars for the evening of **Tuesday, December 10**, as the kickoff meeting for the committee. We will meet at 7:00 PM in Room #305, City Hall, 17544 Midvale Avenue North. We will try to end the meeting by 9:00 PM.

Again, thank you very much for agreeing to serve on this committee. I believe that this will be a very exciting and rewarding process. I look forward to hearing your ideas as the CATF develops their vision for Aurora. Please feel free to call me at 546-3901 if you have questions or information to share. I will be out of the office from Friday, November 6, through Wednesday, December 2. If you have questions in the meantime, please feel free to phone Chuck Purnell of our Public Works Department at 546-0774.

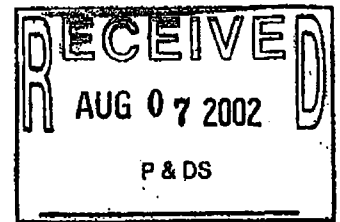
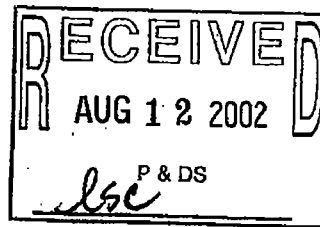
Sincerely,

  
Kirk McKinley  
Transportation Planner

KM/pn

Enclosure

Jerilee Noffsinger  
17920 Stone Avenue North  
Shoreline, WA 98144



July 22, 2002

Log # 23

Shoreline Planning Commission  
17544 Midvale Avenue North  
Shoreline, WA 98133

Attention: EIS Hearing Examiners  
Aurora Corridor

To Whom It May Concern:

23-1

I am writing to voice my objections to Alternatives "A" and "B" presented in the Aurora Corridor Improvement EIS as adopted by The City of Shoreline.

23-2

I object to 12-foot sidewalks which will take business frontage along Shoreline's 3-mile stretch of Aurora and force many of the businesses out of business. In many places 12-foot sidewalks will eliminate business parking and front row display space for current businesses. If the Interurban Trail project which parallels Aurora provides a safe place for pedestrians to walk adjacent to Aurora, why do we need 12-foot wide sidewalks which will close minimally 25 businesses along the 3-mile corridor. The stated 25 businesses

23-3

does not include the businesses which will close due to loss of parking. My perception is that pedestrians will not choose to walk Aurora when they can walk the Interurban Trail. They will not choose to walk Aurora whether or not we have the Interurban Trail.

23-4

I am going to speak to the losses of CarePlus Medical Center. If 12-foot sidewalks and the center median goes in per the plan adopted by The City of Shoreline, CarePlus will lose its front parking (so will the businesses south of CarePlus). CarePlus will also lose its handicap access. Since we are an "Urgent Care Clinic" as well as a "Family Practice" clinic, loss if just these two critical requirements for our type of business could quite conceivably shut us down. When a person is experiencing chest pain or is lacerated, easy access is critical. If the sidewalks take out the parking and the median



23-4  
cont...

forces the patient to drive beyond the clinic, find a left U-turn lane and come back, chances are, we could actually lose lives because of this project. (Quite frankly, I cannot picture my 80 year old patients doing left U-turns across 3 lanes of traffic. Also, emergency vehicles currently use the center two-way turn lane to get to us in time to transport critical chest pain, burns, etc., to the hospital in time to save lives. As I see it, the one life a year from traffic incidents DOT feels they will save by putting a center median with U-turns in, could cost as many as seven (7) lost lives from my clinic alone. In addition, the lives lost in neighborhoods from cut-through traffic must be taken into consideration when weighing the benefit of a project that will create additional cut-through traffic. It is clear to me that this project will create additional neighborhood cut-through traffic because I will educate my patients of the other routes available to them if they do not want to adventure onto Aurora. So what I am saying here is how is the issue of the additional cut-through traffic that these alternatives create being addressed.

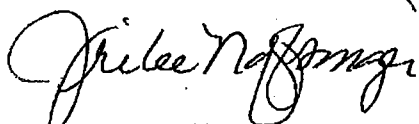
23-5

23-6

Secondly, with regards to the center median, I have asked the question several times of WSDOT, to show us studies which provide proof of their statement that center U-turn lanes are safer than open two way left turn lanes. They are unable to direct us to any studies which prove their theory. I would be very grateful if this issue could be addressed in the EIS using studies done on a similar urban commercial corridor.

I question the wisdom of WSDOT and the City of Shoreline who would risk losing more businesses, which offer many family wage jobs, in an already distressed business environment. When you take away our accessibility, our visibility (trees blocking signage) our parking and our display areas, businesses and family wage jobs are going to go away.

Sincerely,



Jerilee Noffsinger

Business Manager, CarePlus Medical Center

Resident Meridian Park Neighborhood

P.S. I totally & completely object to the waste of my tax dollars to do this extravagant plan. Am

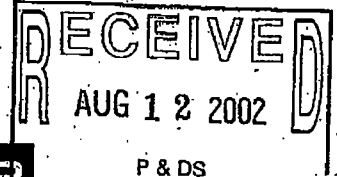
PLANNING COMMISSION / SEPA OFFICER  
 16 AUGUST 2002, 5:00 PM  
 CITY OF SHORELINE  
 SHORELINE, WA 98133



CITY OF  
**SHORELINE**

**AURORA CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



Log # **24**

**Aurora Avenue 145-165 Open House and Hearing 8/6/  
 Public Comment Form**

Name HAN WON SUP

Address 1616 NW 185TH STREET  
SHORELINE, WA 98177

Phone (206) 542 0555

Comments on the EA/Draft EIS:

~~My property is located at 16523 Aurora AVE N. By the cities Aurora corridor plan, there will be a traffic light to be built, but unfortunately my property is located too close to the traffic lights, which is less than 200 feet to change 3 different lanes to reach~~

To whom it may concern:

I am a property owner on Aurora which is located at 16523 Aurora AVE N. I am very concerned about the Aurora corridor plan because by the plan, there will be a traffic light to be built at the intersection of 165th & Aurora AVE N. Unfortunately for me, my property is located too close to the traffic lights. As a matter of fact, to make a left turn from my property, people have to change three different car lanes to reach the left turn pocket to wait for the signal. As you may know that situation will be very dangerous especially in traffic. Which Aurora AVE N. witnesses numerous amount of times. In the near future, I'll be building

See Attached →

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

an auto service mall, which will contain 20,000 sq. ft. My prospective tenants will have a tough time dealing with the problem. That will lead me into trouble finding tenants which ultimately holding me back from building a future success on Aurora Ave N.

Please find a solution for my situation or please reconsider the corridor plan, there should not be any victims because of the corridor plan.

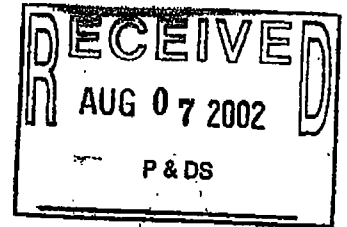
Thank You for your time.

Won S. Han

206 542 0555

*W. Han*

08/07/02

Log # 25

Daniel A. Mann  
17920 Stone Avenue North  
Shoreline, WA 98133

July 22, 2002

Attention: EIS Hearing Examiners

Shoreline Planning Commission  
17544 Midvale Avenue North  
Shoreline, WA 98133

To Whom It May Concern:

25-1 | I am writing to object in the most strenuous terms to Alternatives "A" and "B" in the Aurora Corridor EIS and the process by which they were developed.

25-2 | My objections start with the fact that the Citizens Advisory Task Force was not representative of the Aurora businesses nor of the most impacted neighborhoods. There were only two Aurora Avenue merchants on the task force, instead of the five originally agreed to by the council. There was no representation from Meridian Park, one of the most highly impacted of the residential neighborhoods despite the application of several of its residents.

The Citizens Advisory Task Force was chaired by someone who stands to make *millions of dollars* on the basis of this plan raising the value of his real estate holdings. This was a clear conflict of interest that should have disqualified him from participation, let alone leadership. Additionally, there are few records, if any, of the alleged meetings and only one record of any voting - and that record is disputed by two of the participants.

25-3 | I also object to plan design features that waste precious commercial Aurora corridor real estate and make doing business more difficulty in an already difficult business environment. The 12-foot sidewalks are an extravagant waste of limited commercial frontage for an already built-out urban

25-3  
CONT. commercial corridor. In many instances, those sidewalks will take most or all of small business parking - making the land commercially useless.

25-4 The continuous raised center medians will reduce access for customers and cause many of them to simply drive by without stopping. We (Aurora

25-5 Corridor Merchants) have seen no proof from WSDOT that focused mid-block U-turns are safer than mid-block left turns. Common sense tells me that a U-turn across three lanes of traffic is more dangerous than a left turn. Furthermore, the medians are a huge impediment to freight mobility

25-6 on this commercial corridor. Large trucks and semi-trucks are unable to make U-turns in the space available within the median, and will be compelled to access their customers by traveling through adjacent residential

25-7 neighborhoods. Emergency vehicles will also be impeded by the medians.

25-8 The alternative plan for Aurora created by the Shoreline Merchant's Association will solve the traffic problems at less than one-third the cost without destroying businesses, jobs and tax flow. It increases capacity with less stoppages than the city's plan, and provides greater emphasis on pedestrian safety. It's a sensible alternative that meets the traffic, safety, and economic needs of the community.

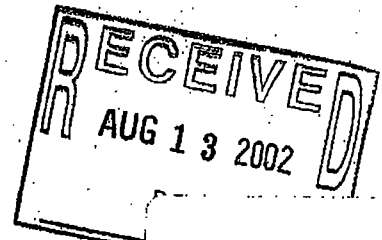
Sincerely,



Daniel A. Mann  
Aurora Business Owner and  
Meridian Park Resident

CITY OF  
**SHORELINE****AURORA****CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET

Log # **26****Aurora Avenue 145-165 Open House and Hearing 8/6/02****Public Comment Form**

Name

*Barbara B. Fay*

Address

*19275 Stone Aven*

Phone

*(206) 546-3793**Shoreline, WA  
98133 - 3612***Comments on the EA/Draft EIS:**

- 26-1 We didn't see the <sup>Entire</sup> Draft! There was a \$12 fee to copy it ahead of time. I stopped by our 185th St. Police Station - it had neither draft nor summary available. No one there to explain either was available.
- 26-2 The "Summary" at Open House was extremely vague. No one was there to give details at the E1 Hearing, as I first to listen to 3 min. of speakers expressing their views. I planned, I learned nothing in depth on the EIS - other than by speaking to and asking questions of the Oil Containment Mechanism during the Carillon Open House by a sincere helpful gentleman.

Held 5:30 - 10pm on a summer night in August when people are on vacation or at work and deserve a meal first (other than we retired folk).

Is this a how can we do all this? Sincere sharing educational offering.

Please leave your comments with us tonight or mail your comments to: Dr. an "on Record" expert  
Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

10 There was insufficient time to view Corridor plans A+B in Section 1, speak with those helping to clarify, and read the new Summary before the actual hearing began. Prepared speakers were able to express their views (yet many didn't stick to environmental issues it seemed) and I learned from them all.

In hindsight: the Summary should have been available weeks ahead for study, and free, so the sense of "railroading" would have been dispelled. A Sept. hearing, when residents are more likely to be in town to consider and give input, would measure confidence in the process. I sensed "pressure"

I would wish for a Sept. followup with business' Plan C also considered environmentally (or clarified as to why it was not studied) and/or a panel that could respond to questions, informatively.

The general Summary is so vague esp. concerning areas of water quality, storm drainage, "accommodate", "treat..." run off do not give us a good enough picture. What is considered "adequate"? Safe?

Draft EIS Comm rts continued  
(upon reflection and reading 26-3 Summary at home)

26-5

2

## Aurora Corridor EA/Draft EIS

26-6

I heard many concerns for fish habitat. How will the "treating" affect those people ~~on~~ our lake to the north and those who fish and swim in it from the surrounding neighborhoods at the public park's north end?

26-7

Our Echo Lake Comm. Assn. of homeowners, <sup>renters and</sup> apt. owners around the lake has been assured that our environmental concerns will be fully studied and discussed at the appropriate time. Our President, David Ashton has a letter on file in your City Office with these concerns. When is "appropriate"?

I came to the meeting to learn more of each plan's environmental impact on Section One. I felt if one plan is deeply favored, the likelihood of its continuance in the subsequent sections on Aurora would be difficult to alter.

26-8

Other than oil I need to know what will end up in Echo lake. Following the

72

"Prohibited Discharge" Regulations...



3.

back, a trap was supposedly added to catch oil, sediments and trash. It's somehow ineffective, with no one correcting.

No agency claims responsibility or desire <sup>or budget</sup> to test the lake water in earnest for its water quality even now.

For any environmental statement regarding the lake, I request it to be tested by the city now - for safety and future comparison.

If it's unsafe now (for fishing, swimming) the neighborhood should be alerted.

If, hopefully, it is safe for these activities so enjoyed, you will have background standards to measure water quality as you build the corridor in future sections and the Urban Trail behind the Lake. Thinking ahead... more people will discover this lovely Echo Lake and it could be a point of pride for us all,

4.

"After the fact" discoveries, too late, can be so disheartening. I'm addressing this now, for I feel one plan's approach surely affects the subsequent ones along the Highway and Trail.

26-a

In the City Council's 2002-2003 Work Plan recently published, it places "Building the Corridor" as a first priority on the list ..... and "developing a water quality and environmental program up to state and federal regulations" .... next to last!

That seemed illogical to me and presents some concerns. Along with the fluctuations in hearing decisions over Aegis Construction with a "build now, get permit later" approach, it's stressful!

May we count on the Planning Commission and our City now responsible for SEPA, to do an in-depth study of environmental impact, not revealing.

74

5,

having to rely on "public controversy" to do so, that keeps our sole swimming lake safe? [People Swim, lifeguards are parents.]

We must believe the Planning Commission deserves our respect and supports the code of values recently pledged in "Vision Shoreline". We want to believe it.

Help us maintain a "safe place to live, with pride in our neighborhood with its beautiful outdoor and recreational opportunities."

I'm not against Corridor improvement, I'm solely advocating lake testing now, and intensive means of protection <sup>planned</sup> for this lovely lake that could become a low level "dumping ground of progress" gone wrong, unless the city shares our concerns and values it, and protects it.

My children, who grew up on the lake and now bring grandchildren, are asking "is it still safe?" They will assure you I'm no "eco-terrorist", just one who deeply values those who...

6.

on Echo Lake, a dear part of  
our life's memories and pleasures.  
(I'm a full fledged "Vision  
Shoreline" Code supporter, and  
I also volunteered as a  
reading tutor at Echo Lake  
Elem. School last year.)

Respectfully,

Barbara B. Lacy



# FERRELL-PENNING, INC.

GENERAL CONTRACTORS

(206) 546-5166

(206) 522-0857

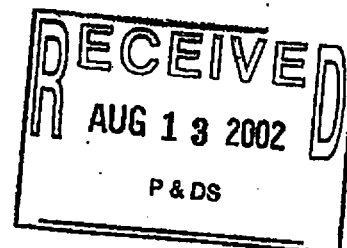
FAX (206) 522-1202

17510 Aurora Avenue North  
Shoreline, Washington 98133

**Log # 2**

August 9, 2002

Mr. Timothy M. Stewart  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Ave. N.  
Shoreline, WA 98133



Subject: Comments on the Draft EIS for the SR99 Aurora Ave N. Multimodal Corridor Project: North 145<sup>th</sup> St. to North 165<sup>th</sup> St.

Dear Mr. Stewart:

27-1 I join virtually every other business owner located on Aurora Ave. in Shoreline, in opposing either of the City's proposed plans A or B. My opposition to the project design is rooted in the fact that either build  
27-2 alternative will result directly in the unnecessary destruction of several existing businesses (see Table 3-39). What's more, the final configuration, with relatively continuous raised center medians will I  
27-3 believe, result in the eventual destruction of dozens of other existing businesses. This belief is  
27-4 supported by several examples, the most dramatic of which is Union Avenue, in Portland, where a once  
27-5 thriving commercial strip was decimated by the introduction of a raised median. 80% of the businesses  
27-6 along that strip failed within 10 years after the median was installed. The City of Portland has since  
27-7 removed the median, and the area is now recovering smartly.

The whole argument for a median is based upon two false premises:

- 27-3 1. WSDOT's contention that Aurora Avenue, through Shoreline, is one of the most dangerous sections of highway anywhere in the State. WSDOT's own accident statistics show that to be an outright lie. No part of this strip is anywhere to be found in WSDOT's latest list of the 71 most dangerous sections of highway in the state.
- 27-4 2. That WSDOT regulations require a raised center median. SR99 though Shoreline remains a "Class 4" highway, under WSDOT's own standards. "Highways in this class are typically distinguished by existing or planned non-restrictive medians" (see WAC 468-52-040).

27-5 WSDOT and FHWA must demand the City perform a NEPA EIS, which requires a study of the Socio-economic impacts of the project. How can our city officials be expected to make wise decisions on this project, which will shape the future of Shoreline forever? I strenuously object to this project going forward without such a study.

27-6 I am struck by the fact that the City of Shoreline has relegated the Aurora Avenue business and property owners to the status of outsiders. These are the very people whose lives and livelihoods will be most impacted by the project, and consequently should have been the most important stakeholders involved in the design and decision process. But from the beginning, the City seems to have deliberately excluded us. I cite as evidence the following:

1. The City ignored the recommendations of its own CPAC (Comprehensive Plan Advisory Committee), which stressed the need to respect the Aurora business owners, and wanted nothing to do with 12' wide sidewalks.

- 2 -

August 9, 2002

- 27-7 2. The City Council resolution passed on October 26, 1998 authorizing formation of the CATF stated that there should be 5 positions for Aurora Ave. business or property owners plus one for a Chamber of Commerce representative on the 13-member task force. Defying that resolution, they appointed only 1 Aurora Ave. business owner (Chuck Olson). They hand picked the task force, including the City's landlord, one of his employees (neither of whom had businesses on Aurora), plus representatives of 2 other businesses not on Aurora, to fill the other Aurora business positions. The City's landlord owns and manages several properties that stand to benefit financially, if the project is constructed under either Alternative A or B. As such, there was a clear conflict of interest for him to even serve on the task force, let alone be appointed its chair.
- 27-8 3. The CATF did not keep adequate records. Of the 14 meetings, they have records of only four. The minutes, such as they are, make no mention of the testimony of dozens of business owners and individuals opposed to the City's designs. They make no mention of the debate over sidewalk the width, nor do they record any votes on sidewalk widths. The only vote they do mention is recorded on a different night than when it actually occurred. These are important points, since they give such weight to the CATF recommendations throughout the DEIS.
- 27-9 4. The City proceeded to divide the project into 3 phases, submitting only the 145<sup>th</sup> St. to 165<sup>th</sup> St. segment for EIS review. From an EIS standpoint this makes no sense I believe it violates EIS regulations. It makes sense only if they are attempting to get approval of their flawed design on the least controversial section of highway, so they can ram this same design down our throats on the other sections, where the impacts will be even more devastating.
- 27-10 5. The City is also taking advantage of the fact that ethnic minorities own a disproportionately large percentage of the businesses in this first section, many of whom do not speak or understand the English language well. For cultural reasons, they are much less likely to even get involved, let alone raise their objections to this project. The City has violated the principle of Environmental Justice.
- 27-11 6. The City initially applied for a NEPA Categorical Exclusion instead of doing an EIS. The Categorical Exclusion can only be used if there is no significant opposition to the project. That was patently untrue, and the City knew it when it submitted the documents.
- 27-12 7. The EIS process requires the City to consider at least one design alternative plus a "No Build" alternative. For this purpose, the City should have considered the design concept used on the Lynnwood Model (page 2-8), but refused.
- a. To suggest that the Lynnwood model was unworthy of study because it lacked pedestrian crossings is absurd. The Shoreline Merchants Association (SMA) has demonstrated how easily and inexpensively the Lynnwood plan could have been modified to satisfy that desire.
  - b. Access management is another straw man in this argument. As you know, access management principles can be applied to any plan.
  - c. The body of study on raised center medians versus two-way left turn lanes (TWLTL's) does not support the conclusion that "Traffic crashes would remain at high levels..."
  - d. The most ridiculous objection to the Lynnwood model is the suggestion that it does not support transit use. I suppose their HOV lane is not used for that purpose.
- 27-13 8. The City refused to even consider the plan prepared by CCFS and SMA (recently referred to by many as Alternative C). That plan met all of the goals of the project, and offered flexibility with regard to pedestrian safety crossings, medians at strategic locations, and access management. That plan had the additional benefit of staying almost entirely within the existing right of way, resulting in dramatically reduced costs and disruption of the businesses. At a 6/26/02 meeting with WSDOT officials, Mr. Phil Fordyce agreed that WSDOT would study the safety implications of the CCFS/SMA plan, as compared to the City's alternatives, but their representative, Mark Leth, has since refused to return repeated phone calls, to further the dialog in this matter.
- 27-14 9. We have not found a single Aurora Ave. business owner who prefers the City's plan to the CCFS/SMA Plan. What is more, the Mayor could not name even one business that preferred the City's plan.
- 78

- 3 -

August 9, 2002

- 27-15 10. Because the City has refused to consider the CCFS/SMA Plan, and refused us the opportunity to present the plan to the public in a City approved forum, the citizens of Shoreline have been denied benefit of a fair and open debate. The citizens deserve the opportunity to compare the plans side by side. That can only happen when the City includes such a study in a corrected EIS.

The current Draft EIS is incomplete and inaccurate in other ways, and must be sent back for corrections and additions. I cite the following reasons to support this conclusion:

- 27-16 1. The segmenting of the project does not meet the test for logical termini. No amount of spinning can change the fact that N. 165<sup>th</sup> is a minor side street, which dead-ends 1-1/2 blocks to the East. It does not have the capacity to support the traffic associated with a logical terminus. I do not object to phasing the construction of this project, for funding or other purposes. However, the EIS must be done on the entire 3-mile section of SR99 through Shoreline, in order to accurately reflect the environmental impacts, which certainly do not end at N. 165<sup>th</sup>.
- 27-17 2. Storm water characteristics do not simply start and stop at arbitrary lines drawn on a map. N. 165<sup>th</sup> can hardly be considered a logical terminus in this regard. Further, the diversion of portions of the Thornton Creek watershed to Boeing Creek could forever change the character of both creeks, impacting their abilities to support various protected fish species.
- 27-18 3. The EIS must also address impacts beyond the immediate construction area. I believe there will be serious long-term changes in traffic patterns that will negatively impact the neighborhoods adjoining SR99. The EIS suggests that traffic will be reduced through the neighborhoods, when logic dictates otherwise. The EIS provides no documentation to support its erroneous claim.
- 27-19 4. Little or no attention has been given to the cumulative impacts of all 3 phases of the Aurora Corridor Project, the Interurban Trail Project, and other major projects planned for this City within the same time frame. The EIS must correct this serious lapse.
- 27-20 5. The EIS does not address serious problems with emergency vehicle access, created by the introduction of a raised center median, under both Alternatives A and B.
- 27-21 6. The EIS does not address freight mobility problems, created by the introduction of a raised center median, under both Alternatives A and B.
- 27-22 7. The EIS claims the build alternatives will improve traffic, but logic dictates that the addition of lanes for the near exclusive use of busses will do little to improve traffic. The EIS must produce evidence to support its claims, or change the lane designation to HOV.
- 27-23 8. The EIS claims to enhance safety, but provides no evidence to support this claim. WSDOT has repeatedly made demonstrably false claims in this regard. If such claims are to be part of the EIS, they must be documented in a corrected EIS.
- 27-24 9. If the City were serious about safety, it would have embraced the SMA's Safety Now concept. That is, install streetlights at the dimly lit locations, add pedestrian safety islands, and reduce the speed limit throughout the 3-mile length of the corridor, now! I believe these could be implemented at a relatively low cost, and will do more to prevent accidents and save lives than anything else the City is planning. Yet the City insists on making 2 miles of the Aurora Corridor wait a decade or more to see any improvements.
- 27-25 10. I challenge the accuracy of the EIS with regard to its tables comparing impervious areas under Alternatives A and B. How can the City claim that the existing impervious areas are 868,400 sf under Alternative A, yet 826,500 sf under Alternative B? This failure to use the same baseline creates the erroneous impression that Alternative B results in a dramatic increase in impervious area. That is hardly likely, when B occupies a much smaller footprint.

27-25A In conclusion, this Draft EIS is incomplete and filled with omissions and inaccuracies. The City must do a NEPA EIS, in order to fully comprehend and mitigate the biological and socio-economic impacts that this project will create. It must study the entire 3-mile section of SR99, as well as the traffic impacts in the neighborhoods on either side. It must use up-to-date and accurate data in its studies and best available science to mitigate impacts. It must provide documentation to support its claims and omit all

- 4 -

August 9, 2002

2725B of the claims it cannot support. It must study the CCFS/SMA plan that it has thus far refused to even consider for political reasons.

The City's irresponsible conduct is fully to blame for any and all delays this project has suffered, or will suffer in the future. It may fall to the courts to decide whether the City's deliberate efforts to exclude the Aurora businesses from the debate is actionable. At the very least it has been unethical, and a horrible precedent. I urge the City to attempt to correct these wrongs by re-opening the debate, to include the more reasonable alternatives offered by CCFS/SMA.

Constructively yours,  
FERRELL-PENNING, INC.

  
Randy Ferrell, Vice President



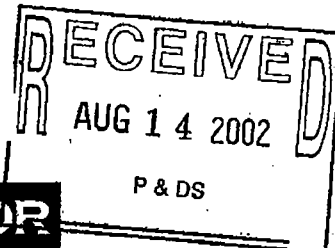


Log # 28

CITY OF  
SHORELINE

AURORA CORRIDOR

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



## Aurora Avenue 145-165 Open House and Hearing 8/6/02 Public Comment Form

Name CARYN TENIN  
Phone (206) 542-1578 (TDD)  
Relay # 711 first

Address 700 160<sup>th</sup> St.  
A103  
Shoreline 98133

### Comments on the EA/Draft EIS:

I've moved to the area in April. Don't feel too comfortable walking on Aurora because of no sidewalks. It is very dangerous for people with disabilities. I'm deaf blind (I am able to see pretty well but very difficult to see at nights).

I favor Plan A for few reasons:

- 28-1 A) wider sidewalks for wheel chair users  
B) spaces for people walking with canes. Blind people won't be hit by trees if Plan B is selected. Both are under ADA regulations.

Once the construction is completed, we may have more people w/ disabilities be visible on Aurora due to better safety in the future.

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

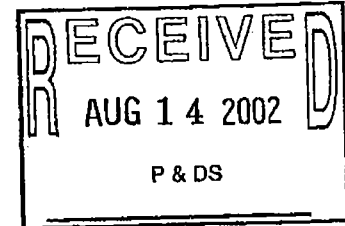
Comments must be received no later than Friday, August 16, 2002 5 p.m.

Log # 29

Fleischman Properties  
917 North 130<sup>th</sup>  
Seattle, Washington 98133  
206 365 2200

August 12, 2002

Timothy M. Stewart, AICP  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, Washington 98133



Re: Draft EIS SR 99 Aurora Avenue North Multimodal Corridor Project  
North 145<sup>th</sup> Street to North 165<sup>th</sup> Street

29-1 We own the property located at 15201-33 Aurora Avenue North, Shoreline, Washington and have been aware of the SR 99 Project for a very short time. In my review of this Draft EIS and Environmental Assessment I find it difficult to believe that the city of Shoreline was not required to prepare a EIS for the entire 3 mile length of the City of Shoreline. This EIS is very confusing since it only addresses one mile of improvement at what seems to be to be an outlandish cost, without any economic data as to how many businesses will be displaced not in just the one mile portion but in the entire area that SR 99 occupies in Shoreline.

29-2 I also do not feel enough attention has been paid as to where all the water will go that is being replaced with pavement, sidewalks, medians, etc.

29-3 In Alternate B there is no mention of any access to my property by Northbound customers which will cause great harm to my business tenants. Alternate A proposes to add 3 more lights to a 10 block area which will mean a total of 5 lights (adding 145<sup>th</sup> and 155<sup>th</sup> to the mix). These five lights I believe will result in traffic jams and do not make sense to me.

29-5 In Alternate B Property Acquisition (3-59) you state that "the amount of property needed for the current design of Alternative B is less than the property take under Alternative A" and the following paragraph while it admits that some parking would be reduced actually ignores that without parking available or even the reduction of any parking availability to businesses, many will fail. I see no mention of how many businesses will actually fail nor do I see any concern for the failure of those businesses.

29-6 I feel this Draft EIS is flawed in that it does not address costs for the entire project of 3 miles, it does not seem to be concerned about water flows into existing streams when we cover additional ground and feel that the Draft EIS does not give me enough information regarding project costs, destruction of business ability to operate, tax losses due to reduced business activity. I understand there is a requirement to produce a NEPA evaluation when an "assessment" is flawed and urge the city of Shoreline to comply with NEPA requirements, to produce a document that addresses social, taxable, and economic impacts for the entire three mile stretch of Shoreline not for just one mile and that the entire document is flawed because it is a series of meaningless statements that do not address the issues as to what is going to be done and how much it will cost to do the entire section of SR99 and how much will be lost because of not realizing that lack of business access and parking will be greatly reduced.

Yours very truly

Dick Fleischman

Cc: Elizabeth Healy, FHWA, Washington Division

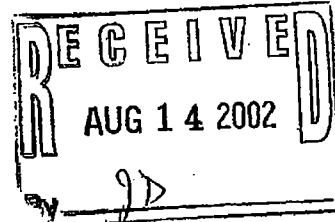
Log # 30paulette gust

14805 whitman avenue north #10  
shoreline, washington 98133-6533  
206 364-0625 paulette@thegusts.com  
day phone 206 628-0044  
fax 206 628-0045

August 13, 2002

SEPA Responsible Official  
City of Shoreline  
17544 Midvale Ave N  
Shoreline WA 98133-4921

Re: Aurora Corridor DEIS



Good morning:

30-1 Thank you for Inviting my comment on the DEIS for the Aurora Corridor. Please record this missive as testimony in support of Alternative A, the proposal CH2M Hill distilled from hours of public meetings and reams of public commentary. This alternative comes closest to meeting the goals of creating a safer streetscape for all users, an environment for economic vitality previously unseen in Shoreline, and a sense of place.

Because the process of developing Alternative A has been called into question, following is an outline of that process as I remember from my participation in it.

The State Department of Transportation gave the new city of Shoreline an opportunity to develop a re-design for Aurora -- which was good because one of the reasons Shoreline Incorporated was to "do something about Aurora". If Shoreline had not developed a state-approved design, or if the city fails to implement it, State DoT will step in to reconfigure the roadway according to its own requirements. The City set about to create a Citizens Advisory Task Force (CATF), an ad hoc committee to create a design for Aurora to meet the City's goals as well as the State requirements.

To prepare for creation of the CATF, the stakeholders had to be identified. The City hired a consultant to interview civic and neighborhood leaders. Those leaders referred the consultant to other leaders who in turn named still other local leaders. This very broad outreach was groundwork just to identify the stakeholders and make sure all were represented on the CATF.

The City received at least thirty-six applications for the thirteen positions. Five positions were reserved for representatives of business or property owners along the corridor plus a sixth seat was reserved for a representative of the Shoreline Chamber of Commerce. Three positions represented neighborhoods along Aurora and two other seats were for neighborhoods at large. The thirteenth position represented the interests of ADA, transit, bicyclists and pedestrians.

All of the CATF meetings were open to the public and besides setting aside time for public comment at each meeting, the chair could recognize speakers during the body of the meeting. Interest in the CATF process was so strong that by the third meeting the CATF meeting was moved from City Hall to larger quarters at Shoreline Center.

During the months the CATF met, outreach continued with additional public meetings and at least three open houses. In a heroic effort to effort to spread the word about the process, CATF members even went door-to-door along Aurora to speak with business owners and managers. Every effort was made to raise awareness and identify issues. The process as open and small-D democratic as possible.

The CATF was appointed to identify the issues along Aurora and produce three distinct approaches to address the issues. These became known as the Alternatives.

This was a highly systematic process. At the first CATF meeting, members performed a mind mapping exercise to identify the issues along Aurora. The issues identified revealed the convergence and sometimes conflict of community needs.

One of the obvious conflicts concerned the City's interest in Aurora's role as Shoreline's "Main Street" versus the State's interest in Aurora as part of a regional transportation network. Two of the three alternatives developed for study emphasized these conflicting needs. The other alternative, called the People Mover alternative, was something of a compromise between Local and Regional Access needs.

Each alternative (Local Access, People Mover, and Regional Access) was constructed to be the epitome of its type. By emphasizing the differences, the three alternatives illustrated the broadest range of design possibilities.

Each element (such as sidewalk widths) of the alternatives was considered in a decision matrix of pros and cons (such as wider sidewalks make a more comfortable pedestrian environment versus wider sidewalks incur greater costs -- especially if more right of way is needed).

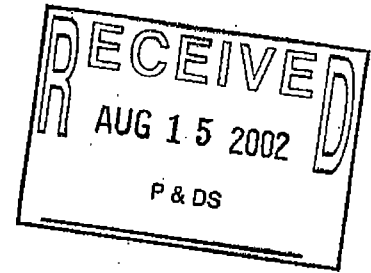
Each alternative was measured against criteria such as "funding feasibility" and "economic development". The criteria used to evaluate the alternatives emerged after public scrutiny of an even wider variety of criteria. Every step of the process gave the CATF and other citizens an opportunity to shape the process and challenge assumptions.

The CATF was encouraged to be farsighted, to look beyond the next five or ten years and formulate a concept that would serve Aurora for decades to come. Tradeoffs were necessary. The People Mover alternative (aka Alternative A) for Aurora is the closest we can humanly come to satisfying our diverse community's need for safety, mobility and a sense of place.

Please build this project; build it expediently and with an eye to the future.

Respectfully submitted,



Log # 31

August 13, 2002

Mr. Tim Stewart  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Avenue N  
Shoreline, WA 98133-4921

Re: Aurora Corridor Project

Dear Mr. McKinley,

31-1

The purpose of this letter is to express support and enthusiasm for *Alternative A* of the Aurora Corridor Project.

*Alternative A* will successfully promote the economic vitality of the corridor by  
1) increasing traffic capacity; 2) improving safety for pedestrians and motorists;  
3) enhancing the livability of surrounding neighborhoods; and 4) providing the  
infrastructure for businesses that provide family-wage jobs. Furthermore, the  
alternative will require much less right-of-way than other designs considered during  
the Pre-Design public study process.

The Aurora Corridor Project represents a great economic development opportunity for  
the City of Shoreline and its residents.

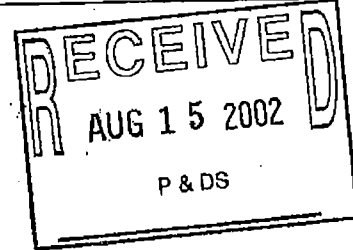
Thank you for your time and consideration.

Sincerely

Art Scheunemann  
President & CEO

cc: Shoreline City Councilmembers: Kevin Grossman, Scott Jepsen, Bob Ransom,  
Rich Gustafson, Linda Montgomery, John Chang, and Ron Hansen

Log # 32



August 13, 2002

Timothy M. Stewart, AICP  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Avenue N  
Shoreline, WA 98133

Dear Sir,

The Shoreline Chamber of Commerce respectfully submits our concerns for submission into the Aurora Improvement Project Draft Environmental Impact Statement process.

32-1 The disruption caused by the Aurora Project will be an additional stress on already overstressed businesses. We do not agree that the effect on retail sales would be "short term and not substantial" (Draft Environmental Impact Statement (DEIS), pxx). Speed of construction is essential to minimize damage to existing businesses. Reducing short and long term expense of the project would be prudent. The Shoreline Chamber of Commerce based our position on the issues our members tell us concern them most. Alternative B closest serves the business community if the following solutions were integrated into the plan.

**Points of Concern:**

- 32-2 1. **Signage.** (p3-64 DEIS), Mitigation measures "economics" street signage for businesses is not addressed.  
**Concern:** Loss of existing signage and loss of roof mounted or pole signs causing loss of business. Expense of moving signage is another concern.  
**Solution:** Any grandfathered signage that needs to be relocated should retain all of its grandfathered rights. The cost of relocating signage should be covered by the project.
- 32-3 2. **Sidewalks.** (pxvii DEIS), Alternative "A" would construct 8 ft. sidewalks, plus an 8 ft. amenity zone.  
**Concern:** The expense of wider sidewalks and amenity zones in construction costs and maintenance is unnecessary. Currently it is required that when a property is sold on a lot where the sidewalk has been reduced to mitigate impacts on a building, that the new owner is required to bring the sidewalk up to code. This could cause a devaluation of the property. This should be changed to be consistent with other code requirements to mitigate impacts.  
**Solution:** Sidewalks should be 8 ft. maximum including any amenity zone. Sidewalks should be reduced to a 5' minimum where it will save existing buildings and parking. In

Timothy M. Stewart, AICP  
August 13, 2002  
Page 2

32-3  
CONT.

event that the sidewalk is reduced to accommodate an existing building, the subsequent owner will not be required to widen the existing sidewalk and adjust the front of their building unless the building is being altered in excess of 50% of the assessed value of the land and buildings combined.

32-4

3. **Medians.** (p2-16) Both alternative "A" and alternative "B" provide less than adequate access to business. There are only 5 dual left turn lanes in alternative "A" (p2-14 DEIS) and 6 dual turn lanes in alternative "B".

**Concerns:** Extra construction costs. More time for construction causes hardship for businesses. Reduced visibility of businesses causes loss of customer traffic. Limiting access for emergency vehicles. Increased costs for maintenance of the median plantings.

**Solution:** There should be no center medians except for pedestrian safety islands at crossing areas (such as those currently at 170<sup>th</sup> and 165<sup>th</sup> on Aurora). The pedestrian islands should be no wider than 12'. For the safety of pedestrians, vegetation should be low growing. Alternative "B" with these listed modifications is preferred.

32-5

4. **Trees.** (p3-134 DEIS), Visual quality; "different maple trees would be planted along the project area".

**Concern:** Trees will cause businesses to be less visible, reducing customer traffic. The cost of maintaining trees is of concern. The extra construction cost for watering, drainage and proper soil preparation is unnecessary. The extra time needed for construction is a burden for businesses.

**Solution:** In amenity zones there should be no trees. Vegetation planted should be low growing.

32-6

5. **Mitigation of Impacts** (p3-21 DEIS), "Partnerships with adjacent businesses would be maintained throughout."

**Concern:** The construction process will hurt access to businesses and disrupt customer traffic.

**Solution:** Finish the project as quickly as possible. Maintain good communication with merchants to minimize negative impacts. Facilitate ingress and egress to businesses.

32-7

6. **Assessment of Property** (p3-33 DEIS), "Property acquired ... at fair market value."

**Concern:** That fair market value be paid for any buildings or property that the project displaces.


**Solution:** Increase the allowable expense for assessing property value to \$15,000.00. Have a mediator available to resolve disputed values.

Timothy M. Stewart, AICP  
August 13, 2002  
Page 3

- 32-8 7. **Cost of Hookups and Utilities.** (p3-139 DEIS), "The removal of utility lines would reduce the visual clutter..."  
**Concern:** Cost of hook ups and underground utilities will be an additional burden to businesses already hurt by the construction process. Many businesses require a steady source of power to operate. Interruptions could hurt their ability to stay open.  
**Solution:** The project should pay for any hook ups and utility connections the construction process requires. Every effort should be made to maintain power to businesses relying on continuous power.
- 32-9 8. **Project Cost.** Table 3-39 (p3-122 & 3-123 DEIS) and "secondary & cumulative impacts" are presented for alternative "B" only (p3-62 DEIS)  
**Concern:** The cost of alternatives "A" and "B" are not estimated for Phases II & III of the project. Most of cost incurred for building demolition will happen during Phase II. The EIS does not give a true picture of the costs of the alternatives.  
**Solution:** Analyze the true cost of alternative "A" & "B" in Phase II and present analysis to the public for comment to help direct design choice.
- 32-10

Thank you for the opportunity to express these concerns. The business community urges the City Management and Council to take these concerns into consideration as you move forward with the planning and implementation of the Aurora Avenue Corridor Project.

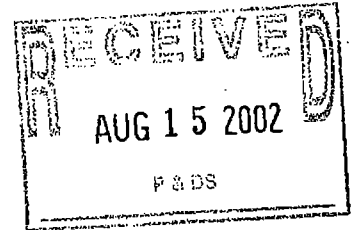
Sincerely,



Greg Olson  
President, Shoreline Chamber of Commerce

General Manager,  
Chuck Olson Chevrolet-KIA





Dale Wright  
18546 Burke No  
Shoreline, Wa 98133

Aurora Corridor Responsible SEPA Official  
City of Shoreline  
17544 Midvale Ave. No.  
Shoreline, Wa 98133-4921

August 15, 2002

**Log # 33**

Dear Sir,

33-1 I enthusiastically support alternative A in the Draft Environmental Impact Statement for the Aurora Corridor Project, N. 145<sup>th</sup> to 165<sup>th</sup> Streets, for the following reasons:

33-2 It will enable the city to achieve the Community's official goals for the Aurora Corridor. Alternative C will not.

The raised medians and the access management should result in a significant reduction of accidents on Aurora. and also reduce significantly the annual societal costs. It has been proven in other states that accident rates are reduced significantly by converting from two way left turn lanes to raised medians.

Other states have also proven that converting from two way left turns to raised medians economically benefits the adjacent business community. Ease of access is not the determining factor of where consumers shop. The determining factors in descending order are customer service, quality of product, and competitive prices. These factors are in control of the businesses.

The overall plan will result in an infrastructure and environment that will permit and encourage our current businesses to grow and prosper and will encourage new business investments. It will enable Aurora corridor to achieve its economic potential, which is necessary for the financial well being of our city. I view alternative A as a pro business plan.

The traffic flow and capacity will be enhanced by limiting access, vehicles using the bat lane to access and egress from businesses, the busses stopping in the bat lanes, elimination of two way left turn lanes and the resultant reduction of conflict points, and the synchronization of the traffic signals.

By enhancing the flow and capacity of the corridor it should encourage side street traffic to the corridor and thereby reduce neighborhood cut through traffic. In addition, the city has committed itself to take corrective action where cut through traffic does occur.

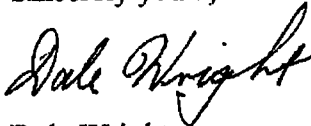
The corridor will be more attractive and esthetically pleasing thereby enhancing the quality of life and attracting consumers to Shoreline.

The financial grants were based upon traffic and pedestrian safety, movement of transit vehicles, and access management. If these criteria are not met, these grants may have to be refunded and/or cancelled. Alternative A will meet the criteria.

A comparison to Lynnwood's highway 99 construction is not appropriate. Theirs is basically a repaving job and was done under expired regulations. Specifically two way left turn lanes are no longer permitted for roads such as Aurora. The Lynnwood project did not address water quality, did not include illumination, did not improve capacity, did not include undergrounding of over-head utility lines, and did not include landscaping. Worst of all, they did include and retained the two way left turn lanes.

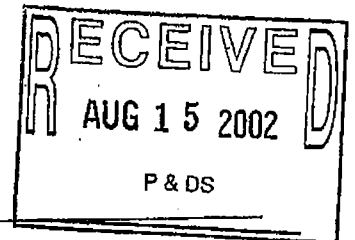
Of prime importance, alternative A will fulfill the community's vision for aurora and it will enable the Aurora Corridor to become a great asset for our city for decades to come;

Sincerely yours,



Dale Wright

E.J. OR FAYE M. GARNEAU  
AKA GARNEAU PROPERTIES



951 North 100th Street  
Seattle, Washington 98133  
206 526 1366 office  
206 528 5590 fax  
Garneau\_Properties@msn.com

**Log # 34**

August 13, 2002

Timothy M. Stewart, AICP  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, Washington 98133

Re: Draft EIS SR99 Aurora Avenue North Multimodal Corridor Project  
North 145<sup>th</sup> Street to North 165<sup>th</sup> Street

We are the owners of commercial property located in the City of Shoreline and have been following the suggested improvements to Aurora Avenue in the City of Shoreline.

34-1 We do not understand why there is a EIS that is only covering one mile of the project when the entire project will encompass three miles. It seems rather shortsighted to make decisions and recommendations on what may or may not occur in a one mile stretch of highway when actually the decisions and recommendations on what may or may not occur on the remaining two miles of highway will effect the entire city and all three miles of highway.

34-2 The total water runoff of all three miles will certainly effect the streams and creeks in the city and most certainly the landscaping will be costly to maintain but I see no mention of effects of water runoff on all three miles or cost of landscaping maintenance for the city on the three mile stretch. Accumulation of water run off and landscaping costs will surely effect the city budget be it for one mile or three!

34-3 Also in some of the meetings I attended there was another alternative suggested by the business community, (who of course are most drastically affected) I believe it was Alternate C, that was not included in the Draft EIS. Why is that? In other EIS's that I  
34-4 have seen there is usually a no change alternative or at least a consideration given to

34-4  
CONT business interests. This Draft EIS does not appear to have considered any business effects that may be caused by condemnation, sidewalks, consolidation of driveways, elimination of "easy" parking etc. Why is this?

34-5 In one alternative (a) it appears that the city will be installing 3 more lights to make a total of 5 lights in a 10 block area. Is this considered good traffic management? Will this not cause traffic jams that will cause drivers to look for other alternatives to driving along SR99? Will this not cause additional traffic out into and on the neighborhood streets?

34-6 Even though our property is not located directly on SR99 we are concerned about the additional real estate taxes that will be levied to finish this project. To indicate that "government" funds will be available is not truthful since those "government" funds are our tax dollars also. It seems unreasonable to spend 20 to 30 million dollars to fix up one mile of SR99 when we actually need to fix up three miles! Where will those additional dollars come from, my tax dollars again?

We never got too excited about the proposed plans because we felt that city officials and employees would be careful with our tax dollars but it appears that we were wrong.

This Draft EIS is so confusing that an average citizen would not be able to understand it and it makes so many conflicting statements that is not a usable explanation of what is going to be done except perhaps to destroy the ability of businesses to operate along SR 99 in the City of Shoreline and spend a lot of money.


SR 99 is a state highway and should be used to travel on, it is not the center of any city, nor is it a simple arterial. It should be remembered that the highway was there before any businesses located along it and in fact it brought the businesses to it, however, when the highway becomes unfriendly to businesses they will re-locate elsewhere. We cannot believe that the City is trying to destroy the business climate of Shoreline but that is what appears to be happening.

34-7 In the final EIS we would like to have more information on costs, how many businesses will fail in actual numbers, how many parking spaces in actual numbers will be lost and how much will the purchase or condemnation of property cost? This information is not clear in the Draft EIS Assumptions are being made that have no basis that businesses will not be drastically affected by lack of access, parking and construction. We would also  
34-8 like to see the Final EIS address NEPA and environmental issues, especially water run offs addressed in a clear concise matter. The vague assumptions that "nothing much will happen" which permeates this document simply cannot be true.

Yours very truly

GARNEAU PROPERTIES

Faye M. Garneau



AUG 15 '02 08:55AM TRAFFIC MANAGEMENT 8/15

P.2/2



# City of Seattle

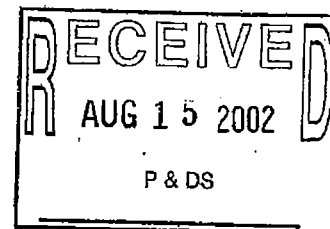
Gregory J. Nickels, Mayor

Seattle Transportation

Grace Crunican, Director

August 13, 2002

Timothy M. Stewart, AICP  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133



Log # 35

Dear Mr. Stewart:

35-1

In response to your recently issued Draft Environmental Impact Statement, I am writing on behalf of the City of Seattle's Department of Transportation to report that my staff will work in coordination with the City of Shoreline in the implementation of improvements to SR 99 (Aurora Avenue North).

In an attempt to address some of the safety, accessibility and mobility issues that currently hinder the movement of people and goods on Aurora Avenue, the Washington State Department of Transportation (WSDOT), in partnership with the City of Seattle, King County Metro and the City of Shoreline, is conducting the SR 99 North Corridor Study. While the Study will not be complete until the end of the year, we already have identified several high accident locations in need of near-term attention.

Based on the Study's findings and our discussions with impacted business owners, the City will propose several short-term and long-term improvements to the SR 99 Corridor between North 38<sup>th</sup> and North 145<sup>th</sup> Streets. We will work with the City of Shoreline to ensure a smooth transition from Aurora Avenue's roadway design north of 145<sup>th</sup> to the roadway design south of 145<sup>th</sup>. As the improvements are implemented, the City of Seattle will remain committed to working with businesses along Aurora to maintain access to their locations.

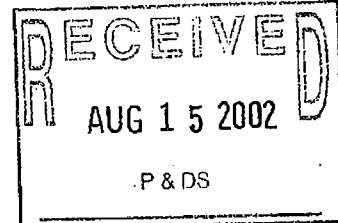
We look forward to working with you in the near future to improve Aurora Avenue North. In the meantime, should you have any questions regarding the City of Seattle's efforts along Aurora Avenue North, please do not hesitate to contact Transportation Planner Thérèse Casper, Seattle Department of Transportation at (206) 615-1963.

Sincerely,

Grace Crunican, Director  
Seattle Department of Transportation

GC:jn

cc: Paul Haines

**Log # 36**

Cody & Cindy Ryu  
15215 Aurora Ave N  
Shoreline, WA 98133-6123  
(206) 362-8832 9-6 M-Th/9-5 Friday  
(206) 533-1251 or (425) 672-1019 H  
(206) 363-7040 Fax

August 14, 2002

City of Shoreline  
Planning Department  
17544 Midvale Ave N  
Shoreline, WA 98133

RE: Aurora Corridor Project SEPA Comment

We live, work, and own property in Shoreline. Our three children attend schools in the Shoreline Public Schools. The property we own in Shoreline are:

1434 NW 198 <sup>th</sup> Place	(SF residence)
15215 Aurora Ave N	(Commercial Building)
15221 Aurora Ave N	(Commercial Building)
19836 Palatine Ave N	(SF residence)

We own the Allstate Insurance agency in the 15215 Aurora Ave N building. We plan on rebuilding on the two parcels at 15215 & 15221 Aurora Ave N in 4-5 years (when tenants' leases end and we have paid off our real estate loan) so we will be starting the permitting process in a couple of years.

36-1 We protest vehemently either Alternative A or Alternative B for the following reasons:

1. **Diminished Access:**

36-2 All northbound customers to our office as well as to our tenants' stores will have to go up to 155<sup>th</sup> then make a U-turn, then find our driveway. We fear during this process, the customers will change their minds, keep going, or find another restaurant or office to go to without the hassle.

36-3 All northbound traffic out of our property will have to go south to the next intersection, do a U-turn, and head north. Our concern is that we have a very short distance (200-300 ft?) to cross THREE lanes of traffic to get into the fourth left turn lane. We will not make it safely across except during

36-3 | hulls in traffic, especially with the additional the U-turn traffic we will be  
cont. | getting from N 155<sup>th</sup> intersection.

36-4 | The reason diminished access has such an impact on us is the effect it has  
| both on our insurance business and rental income from tenants. If current  
| and future tenants perceive detrimental effect of reduced access, we will  
| either not have tenants at all or we will have to lower our rent. Either way,  
| the economic impact on us is tremendous.

## 2. Safety and Visibility

36-5 | Even though safety is cited as the reason for all the money we are spending  
| on this project, we cannot believe that making half the people who want  
| access to local businesses on Aurora to do U-turns will improve it. We  
| personally will have a harder time getting out of our property and we wonder  
| whether we will continue to frequent other Shoreline merchants on Aurora  
| Avenue if THEY have accessibility problems. The volume definitely will  
| increase since we have to traverse further to get anywhere, unless the goal is  
| to reduce volume (i.e. make the area undesirable so we don't get as much  
| local traffic).

36-6 | Visibility is another concern. If vegetation, barriers, and distance (due to  
| widening of Aurora) reduce visibility of our buildings to the traffic, it  
| impacts us economically.

## 3. Economic Impact

Loss of access to local businesses, perception of potential tenants and customers of Shoreline as a difficult place to run a business, burdensome cost of this project, and hostile relationship between merchants and city managers will all lead to a detrimental economic impact on the City of Shoreline. Before the city funds are affected, individual merchants and landlords will feel the impact first.

36-7 | We understand we do not own a significant enough amount of real estate to  
| make any difference to the City. Some of our options are: try to sell the  
| properties (run away from the problem), do not build (keep as is), or live  
| with what is being forced on us. Another option is to get our very own turn  
| out in the concrete barrier so that we have access. We want a turn out in  
| front of our property.

If we cannot, we will be looking at who all got the turn outs and we will be going to court and to the press to contest the discriminatory favoritism. At the most, our access will be maintained; at the least we will hold up the process as long as we have money and breath left in us.

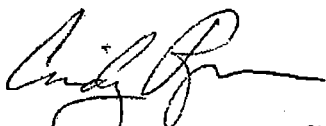
36-8 | Also, for us to be able to live with what either options would entail after all that, we would like a real mockup of 3 or 4 lane U-turn intersections to demonstrate viability of both alternatives. Put up TEMPORARY concrete barriers to give a real live feel for how it will work before we put in permanent barriers.

36-9 | In summary, we are very worried about either of Alternative A or B being considered. The No Action Alternative you wasted effort and time in preparing the EIS is a put down of the people of Shoreline. We are not saying we love Aurora the way it is.

36-10 | However, there must be another alternative to A & B that address beautification, safety, and traffic volume concerns and is mutually acceptable to both the city managers and the merchants. Perhaps it may even cost less.

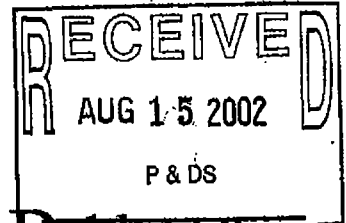
Please take another hard look at what raised landscaped median barriers down the middle of Aurora will do to the economic health and psyche of the Aurora Corridor merchants. We do not want to have to sell everything we own in Shoreline and try to settle somewhere else nor do we relish the idea of a long drawn out battle with the staff of City of Shoreline.

Sincerely,

  
Cindy Ryu, MBA & Cody Ryu



Log # 37

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August 14, 2002

Timothy Stewart  
SEPA Responsible Official  
Aurora Project, N. 145<sup>th</sup> to N. 165<sup>th</sup> Streets  
Planning and Development Services, City of Shoreline  
17544 Midvale Avenue North  
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RE: Comments on EA and DEIS for Aurora Project, North 145<sup>th</sup> to North 165<sup>th</sup> Streets

Dear Mr. Stewart and Ms. Healy:

I am writing on behalf of the Shoreline Merchants Association ("SMA") (previously known as the Aurora Improvement Council) to comment on the Environmental Assessment and the Draft Environmental Impact Statement (DEIS) for the Aurora Corridor Improvement Project from N. 145<sup>th</sup> to N. 165<sup>th</sup> Streets. The members of SMA and their experts have provided to you detailed, specific comments on the adequacy of the DEIS with respect to its discussion on traffic impacts, land use impacts, economic impacts, etc. This letter provides the legal context in which to incorporate those comments submitted by others.

A. Time Limit for Commenting is Too Short

Several members of the SMA requested an extension of the written comment period (as did I) and all were denied. This is extremely disappointing as it overlooks the importance of public participation in SEPA and NEPA.

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37-1 The Aurora project raises numerous issues, many of which are rather complex and controversial. It took almost a year for the City and the Federal Highway Administration (FHA) to prepare the DEIS that we are now commenting on. The citizens, having no idea what would be in the DEIS before it was issued, could not even begin to prepare comments until after July 10, 2002. They were allowed approximately one month to respond. The comment period fell at the heart of summer when most people are on long vacations -- leaving some only one or two weeks to comment. To make matters worse, the "meat" of the DEIS, the studies that support the conclusions therein, were not even attached as Appendices despite that they typically would be.

37-2 The DEIS incorporated studies that supported its conclusions by reference. However, agencies may do this only if it does not impede public review of the action. 40 C.F.R. §1502.21. "No material may be incorporated by reference unless it is reasonably available for inspection by potentially interested persons within the time allowed for comment." *Id.* Here, the material that was incorporated by reference was not reasonably available within the time allowed for comment. The documents were at three locations -- the WSDOT Office, the City Clerk's Office, and the FHA. They were not at the library. Therefore, the public could inspect them only by going to one of these locations during business hours (a difficult task when people must work). Furthermore, the studies required hours and hours of time for an adequate review. Few people had time within the short comment period to spend several hours during the work week at one of these agencies to review the studies.

I ask again that the comment period be extended to allow more time for these reasons.

B. The DEIS should have been prepared for the entire Aurora Corridor Improvement proposal, not solely for North 145<sup>th</sup> to North 165<sup>th</sup> Streets.

37-3 There should be just one EIS prepared now for the entire Aurora Corridor Improvement Project, from North 145<sup>th</sup> Street to North 205<sup>th</sup> Street, and it should be prepared in conjunction with the requirements of not only the State Environmental Policy Act (SEPA), but also the National Environmental Policy Act (NEPA). This will ensure consistency with both laws early in the process, and will avoid delay and duplication of efforts in the end.

1. Consideration of just N. 145<sup>th</sup> to N. 165<sup>th</sup> Streets constitutes improper phasing of environmental review.

The DEIS being prepared for just a portion of the three-mile corridor improvements constitutes improper phasing of environmental review. The City cannot prepare one EIS for half of the project and then, later, a separate EIS for the other half of the proposal.

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The SEPA rules state:

Proposals or parts of proposals that are related to each other closely enough to be, in effect, a single course of action *shall* be evaluated in the same environmental document. (Phased review is allowed under subsection (5)). Proposals or parts of proposals are closely related, and they shall be discussed in the same environmental document, if they:

- 37-3  
CONT.
- (i) Cannot or will not proceed unless the other proposals (or parts of proposals) are implemented simultaneously with them; or
  - (ii) Are interdependent parts of a larger proposal and depend on the larger proposal as their justification or for their implementation.

WAC 197-11-060(3)(b) (emphasis supplied). As the quoted provision above states, environmental review may be phased, but the rules make clear that phased review is not appropriate when:

- (ii) It would merely divide a larger system into exempted fragments or avoid discussion of cumulative impacts; or
- (iii) It would segment and avoid present consideration of proposals and their impacts that are required to be evaluated in a single environmental document under WAC 197-11-060(3)(b) or 197-11-305(1); however, the level of detail and type of environmental review may vary with the nature and timing of proposals and their component parts.

WAC 197-11-060(5)(d). Federal law requires that the EIS consider "connected actions," "cumulative actions," and "similar actions." 40 C.F.R. §1508.25.

The "Aurora Avenue North Multimodal Corridor Project," which has been analyzed over the last three years, has consistently been defined as the three-mile portion from the City of Seattle limits,

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37-4 | north to the King County/Snohomish County border.<sup>1</sup> The proposal for N. 145<sup>th</sup> to N. 165<sup>th</sup> is clearly related to the proposal for N. 165<sup>th</sup> to N. 205<sup>th</sup> closely enough to be, in effect, a single course of action. Indeed, the two combined constitute a single course of action that has been analyzed and developed as one single project over the last three years. In 1998, the City of Shoreline began the "Aurora Avenue North Multimodal Corridor Study" with federal grant monies. The project was, and always has been, defined as improvements to Shoreline's three-mile portion of State Route 99 (SR 99), which will extend from N. 145<sup>th</sup> Street to N. 205<sup>th</sup> Street, not just N. 145<sup>th</sup> to N. 165<sup>th</sup> Street.<sup>2</sup> Throughout the process, the City has consistently analyzed the *entire* three miles as one project. For example, the City analyzed the existing transportation conditions and the existing roadway operations for the entire three miles, such as traffic patterns, traffic growth, average daily traffic and expected future traffic volumes, and intersection levels of service. The City put together a Citizens Advisory Task Force and an Interagency Technical Advisory Committee, and held open houses to develop and define exactly what the improvements should be for the entire three miles, not just for N. 145<sup>th</sup> to N. 165<sup>th</sup>. The participants developed issues and concerns for the entire three miles and analyzed design issues and options to address those concerns. This resulted in the development of three distinct alternatives for the entire project, which were outlined and analyzed in significant detail with respect to a coherent project from N. 145<sup>th</sup> to N. 205<sup>th</sup> Streets. After all of this work on one single project, it makes no sense for the City to prepare one EIS for the improvements from N. 145<sup>th</sup> to N. 205<sup>th</sup>, and then conduct separate environmental review (presumably, a second separate EIS) for the exact same type of improvements from N. 165<sup>th</sup> to N. 205<sup>th</sup>.

37-5 | As is clear from the formation of the proposal as one project over the last three years, development of N. 145<sup>th</sup> to N. 165<sup>th</sup> and development of N. 165<sup>th</sup> to N. 205<sup>th</sup> are clearly interdependent parts of the larger proposal and depend on the larger proposal for their justification. Preparing two separate EISs would avoid adequate discussion of the impacts of the entire project because it would avoid disclosure and analysis of impacts that would be considered if the entire project was reviewed in one EIS. For example, from our review, the impacts to water quality and quantity from surface water runoff created and directed into Thornton Creek or Boeing Creek are significant for the entire

37-6 | 1

I assume that the Multimodal Corridor Project Design documents for the entire project (from 145<sup>th</sup> to 205<sup>th</sup>) that have been prepared over the last three years are considered part of the record for the DEIS. If they are not, I request that the City include those documents in the record. In addition, I request that the City include the minutes from City Council meetings over the last three years that are relevant to this proposal in the record.

2

The Base Mapping, Preliminary Engineering, and Environmental Review Project Workplan and Instructions (July 2000) describe the project as to "provide mapping, environmental assessment, and preliminary engineering services to the City of Shoreline for improvements to Aurora Avenue North between North 145<sup>th</sup> and North 205<sup>th</sup> Street (approximately three miles)."

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37-7 project. But the DEIS discussion of these cumulative impacts is conclusory and far too brief because the focus is secondary on the second project (it receives less than a page of consideration in the DEIS). Contrary to the brief conclusory statements, the stormwater impacts from the entire development, from N. 145<sup>th</sup> to N. 205<sup>th</sup>, are significant when considered together. As another example, the combined projects will have a significant impact on the existing businesses on Aurora, severe enough to put them out of business entirely or cause them to leave the City of Shoreline. The DEIS that discusses the impacts to businesses from N. 145<sup>th</sup> to N. 165<sup>th</sup> only has omitted a realistic and credible discussion of the significant adverse impacts that will occur to these businesses once the combined projects of the Interurban Trail and improvements to N. 165<sup>th</sup> to N. 205<sup>th</sup> are considered. The DEIS has improperly left the impression that the cumulative impacts of all of these projects will improve business in the City. The failure to combine consideration of the projects avoids discussion of the cumulative impacts of business loss over the entire stretch of Aurora within the City of Shoreline.

37-8 Phased review segments and avoids present consideration of the already well-defined proposal to develop N. 165<sup>th</sup> to N. 205<sup>th</sup> and those impacts. The proposal for N. 165<sup>th</sup> to N. 205<sup>th</sup> is as clearly defined at this stage as the proposal from N. 145<sup>th</sup> to 165<sup>th</sup>. Indeed, they are the same proposal. Therefore, preparing the DEIS on the former and not the latter constitutes improper phasing.

2. The City and FHA cannot delay environmental review of the N. 165<sup>th</sup> to N. 205<sup>th</sup> portion of the project because the principal features of the proposal and its impacts can be identified now.

37-9 The City and FHA cannot prepare one EIS (or EA) on half of the project now, and delay preparing an EIS on the N. 165<sup>th</sup> to N. 205<sup>th</sup> Streets portion of the project when that latter proposal is as well-defined now as the first proposal. The process must be integrated with agency activities at the earliest possible time to ensure that planning and decisions reflect environmental values, to avoid delays later in the process, and to seek to resolve potential problems. WAC 197-11-055(1); 40 C.F.R. §1501.2. The agencies are required to prepare an EIS on a proposal (N. 165<sup>th</sup> to N. 205<sup>th</sup> Streets) at the earliest possible point in the planning and decisionmaking process, when the principal features of a proposal and its environmental impacts can be reasonably identified. WAC 197-11-055(2); 40 C.F.R. §1502.5. An EIS shall be prepared early enough so it can serve practically as an important contribution to the decisionmaking process and will not be used to rationalize or justify decisions already made. WAC 197-11-406.

A proposal exists when an agency is presented with an application or has a goal and is actively preparing to make a decision on one or more alternative means of accomplishing that goal, and the environmental effects can be meaningfully evaluated.

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WAC 197-11-055(2)(a) (emphasis in original). See Indian Trail Property Association v. Spokane, 76 Wn.App. 430, 440-441, 886 P.2d 209 (1994) (Because the principal features of a proposal and its environmental impacts could be reasonably ascertained at the time that a request for a zoning interpretation was made, the County was required to conduct a SEPA review for the interpretation.) Here, the City has a goal to develop not just the first half of the project, but also the second, and has been actively preparing to make a decision on the means of accomplishing that goal over the last three years. The proposal for N. 165<sup>th</sup> to N. 205<sup>th</sup> is as far along in the process as the proposal for N. 145<sup>th</sup> to N. 165<sup>th</sup>. The environmental effects of the former can be meaningfully evaluated because that proposal is defined now to the same degree as the latter.

Early review and disclosure of the portion from N. 165<sup>th</sup> to N. 205<sup>th</sup> would best serve the purposes of SEPA:

The procedural duties imposed by SEPA—full consideration to environmental protection—are to be exercised to the fullest extent possible to ensure that the ‘attempt by the people to shape their future environment by deliberation, not default’ will be realized.

37-10 Citizens v. Klickitat County, 122 Wn.2d 619, 640, 860 P.2d 390 (1993), quoting Eastlake Community Council v. Roanoke Assocs., Inc., 82 Wn.2d 475, 490, 513 P.2d 36 (1973). Appropriate consideration of environmental information on the second half of the project must be completed before the City commits to the improvements on the first half of the project. WAC 197-11-055(2)(c). No action may be taken by the City or the FHA that would limit the choice of reasonable alternatives. WAC 197-11-070(1)(b); 40 C.F.R. §1506.1. An agency shall not commit resources prejudicing selection of alternatives before making a final decision. 40 C.F.R. §1502.2. If the agencies prepare an EIS (or EA) of just N. 145<sup>th</sup> to N. 165<sup>th</sup>, and then proceed with approval of permits and construction of just that portion, it will improperly lock in the choices of alternatives for the northern half of the project.

#### C. An EIS is Required under NEPA

NEPA establishes “action-forcing” procedures that require federal agencies to take a “hard look” at the environmental consequences of their actions. Kern v. Bureau of Land Management, 284 F.3d 1062, 1066 (9<sup>th</sup> Cir. 2002); Metcalf v. Daley, 214 F.3d 1135, 1141 (9<sup>th</sup> Cir. 2000). NEPA’s policy is to ensure that an “agency will not act on incomplete information only to regret its decision after it is too late to correct.” Marsh v. Oregon Natural Resources Council, 49 U.S. 360, 317 (1990). For this reason, “agency action taken without observance of the procedure required by law will be set

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aside." Metcalf, 214 F.3d at 1141; Save the Yaak Committee v. Block, 840 F.2d 714, 717 (9<sup>th</sup> Cir. 1988).

NEPA requires that an EIS be prepared for all "major federal actions significantly affecting the quality of the human environment." 42 U.S.C. §4332(2)(c). If, in light of the environmental assessment, the agency determines that its action will significantly affect the environment, then an EIS must be prepared. See 40 C.F.R. §§1501.4, 1508.9; Kern, 284 F.3d at 1067.

37-11 "An agency cannot avoid its statutory responsibilities under NEPA merely by asserting that an activity it wishes to pursue will have insignificant affect on the environment." Alaska Center for the Environment v. U.S. Forest Service, 189 F.3d 851, 859 (9<sup>th</sup> Cir. 1999). If an agency decides not to prepare an EIS, it must supply a "convincing statement of reasons" to explain why a project's impacts are insignificant. National Parks and Conservation Association v. Babbitt, 241 F.3d 722, 730 (9<sup>th</sup> Cir. 2001); Metcalf, 214 F.3d at 1142; Blue Mountains Biodiversity Project v. Blackwood, 161 F.3d 1208, 1211 (9<sup>th</sup> Cir. 1998). The statement of reasons is crucial to determining whether the agency took a "hard look" at the potential environmental impact of a project. Blue Mountains, 161 F.3d at 1212; Save the Yaak, 840 F.2d at 717.

37-12 "An EIS must be prepared if 'substantial questions are raised as to whether a project may cause significant degradation of some human environmental factor.'" Idaho Sporting Congress v. Thomas, 137 F.3d 1146, 1149 (9<sup>th</sup> Cir. 1998) (emphasis in original) (quoting Greenpeace Action v. Franklin, 14 F.3d 1324, 1332 (9<sup>th</sup> Cir. 1992)). Here, there can be little question that substantial questions are raised as to whether the Aurora Project may cause significant environmental impacts. The City has acknowledged this fact in that it prepared an EIS already. As the comments herein and those submitted by SMA members, SMA experts, and other members of the public demonstrate, there are significant adverse impacts caused by the proposal that were not adequately disclosed in the EA/DEIS.

The CEQ regulations set forth general factors agencies must consider in determining whether a contemplated action is a "major federal action significantly affecting the quality of the human environment," thus requiring preparation of an EIS. 40 C.F.R. §1508.27. An EA must analyze the impacts of the proposed federal action on the environment both in terms of "context" and "intensity." Id. As to "context," the agency must consider whether the action has impacts on "society as a whole, ... the affected region, the affected interests, and the locality." Id. at §1508.27(a). As to "intensity," the agency must consider, among other factors, whether the action "is related to other actions with individually insignificant but cumulatively significant impacts," id. at §1508.27(b)(7); whether the action "threatens the violation of federal, state or local law or requirements imposed for the protection of the environment," id. at §1508.27(b)(10); the degree to which the effects on the quality of the human environment are likely to be highly controversial; id. at §1508.27(b)(4); the degree to

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which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration, *id.* at §1508.27(b)(6); the degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant historical resources, *id.* at §1508.27(b)(8); and, the degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act. *Id.* at 1508.27(b)(9). The examination of any one of these CEQ factors reveals that when the proposed action may have significant environmental impacts, an EIS must be prepared. See *National Parks*, 241 F.3d at 731; *National Audubon Society v. Butler*, 160 F.Supp. 2d 1180, 1188 (W.D. Wa. 2001). Here, not one, but several of the factors delineated by this CEQ are implicated by the Aurora project.

- 37-13 Applying each of these criteria, the first consideration is the degree to which the proposal threatens a violation of Federal law. In this case, this proposal violates federal laws concerning environmental justice. The members of SMA have submitted detailed comments on that issue. Further, the comments submitted show that the effects on the quality of the human environment in the City are highly controversial. There are serious disputes over whether the proposal will improve traffic and safety conditions or actually make the situation worse. The EA does not adequately disclose this real dispute -- providing instead only one perspective. In addition, this is essentially an urban renewal project that will force numerous existing small and/or family-owned businesses to go out of business entirely or leave the City of Shoreline. Regardless of whether or not the City wants to take this path -- it certainly will have significant and highly controversial impacts. The action on 145<sup>th</sup> to 165<sup>th</sup> represents a decision in principle about a future consideration -- that is, approval of the same proposal from 165<sup>th</sup> to 205<sup>th</sup>. As the comments submitted by SMA members elaborate, the proposal will cause the loss or destruction of historical resources. Finally, the proposal will impact threatened species that are found in the Boeing Creek, Thornton Creek, and McAleer Creek Basin areas (as the comments submitted by the members reveal).
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D. Cumulative and Similar Impacts of the Proposal and Other Projects Must be Considered.

The EIS must include consideration of not just direct and indirect significant impacts of the project, but also cumulative and "similar" impacts caused by the proposal. WAC 197-11-792; 40 C.F.R. §1508.25. "To determine the scope of Environmental Impact Statements, agencies consider three types of actions, three types of impacts, and three types of alternatives." WAC 197-11-792. Impacts may be direct, indirect, or cumulative. WAC 197-11-792(2)(c).

A cumulative impact is "the incremental impact of the action when added to other past, present and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions." 40 C.F.R. §1507. Cumulative environmental impacts may be



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significant where "the action is related to other actions with individually insignificant but cumulatively significant impacts." 40 C.F.R. §1508.27(b)(7). If several actions in a discreet geographic area may have cumulatively significant environmental effect, "the consequence must be considered in an EIS." Blue Mountains, 161 F.3d at 1214 (emphasis added); see also, Kleppe v. Sierra Club, 427 U.S. 390, 410 (1976) (emphasis added).

Similar impacts have similarities that provide a basis for evaluating their environmental consequences together, such as common timing or geography. An agency should analyze these actions in the same EIS when the best way to assess adequately the combined impacts of similar actions or reasonable alternatives to such actions is to treat them in a single impact statement. 40 C.F.R. §1508.25(3).

"Consideration of cumulative impacts requires 'some quantified or detailed information; . . . [g]eneral statements about 'possible' effects and 'some risk' do not constitute 'hard look' absent a justification regarding why more definitive information could not be provided.'" Kern, 284 F.3d at 1075 (quoting Neighbors of Cuddy Mountain v. United States Forest Service, 137 F.3d 1372, 1376 (9<sup>th</sup> Cir. 1998)). The cumulative impact analysis "must be more than perfunctory; it must provide a 'useful analysis of the cumulative impacts of past, present and future projects.'" Kern, 284 F.3d at 1075 (quoting Muckleshoot Indian Tribe v. United States Forest Service, 177 F.3d 800, 810 (9<sup>th</sup> Cir. 1999)).

37-18 I discussed above the importance of preparing one EIS for the entire project because of the likelihood that cumulative or similar impacts would not be discussed. The proposal will have a significant impact when considered in conjunction with the proposed Interurban Trail Project, the proposed Ronald subarea plan, and the North City subarea plan. There is also a transit-oriented development being proposed at the Park 'N' Ride at N. 192<sup>nd</sup>. Yet another project being considered that will cause cumulative impacts is redevelopment of the Sears Square, between N. 155<sup>th</sup> and N. 160<sup>th</sup> west to Dayton. The EIS must consider the impacts of the project *combined* with the impacts of the proposal for development of 165<sup>th</sup> to 205<sup>th</sup> as well as the other known projects in the pipeline -- such as the Interurban Trail project. In this case, it is obviously "reasonably foreseeable" that the project from 145<sup>th</sup> to 165<sup>th</sup> will lead to cumulatively significant environmental impacts when "added to past, present, and reasonably foreseeable actions." The impacts of this proposal are also clearly "similar" to the impacts of the proposal from 165<sup>th</sup> to 205<sup>th</sup>.

37-19 In some respects, the DEIS states that it is considering the cumulative impacts of these combined projects, but for reasons described by the SMA members' and experts' comment letters, it fails to disclose adequately what those impacts truly are. For example, the DEIS states that there was some consideration of the cumulative impacts of stormwater for the entire project (from 145<sup>th</sup> to 205<sup>th</sup>) combined with the Shoreline Interurban Trail, but the conclusion that the impacts are minimal is not

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37-19  
CONT. accurate (and the analysis to support this conclusion is itself nowhere included in the DEIS). In  
37-20 another respect, the DEIS fails to consider the cumulative impacts of these proposals at all. For  
example, the description of land use impacts in the DEIS summary is inadequate. As described  
above, this is an urban renewal project that, when combined with the other projects, will have  
significant adverse impacts on the existing businesses. This DEIS leaves the decisionmaker to  
believe that the proposal will require acquisition of minor amounts of property. On the other hand,  
37-21 if the DEIS were considering the entire project, as well as the Interurban Trail, it would disclose that  
the number of acquisitions will be significant from 165<sup>th</sup> to 205<sup>th</sup>. The EIS should have thoroughly  
analyzed the right-of-way acquisition process for the entire project and should have thoroughly  
analyzed the expected needs and detail of not just construction within the existing right of way, but  
also what new right of way will be purchased for the entire proposal and each alternative. It is  
37-22 important that the disclosure of impacts be specific in defining exactly which properties will require  
right-of-way acquisition and which will require construction within existing right of way. Because  
the EIS is being prepared to support a decision on a right-of-way permit, the City must have before  
it the impacts of the proposal all the way from 145<sup>th</sup> to 205<sup>th</sup>, as compared to the impacts of  
alternatives along that entire stretch, so that it can truly understand these different impacts prior to  
making a decision on the right-of-way permit. In that same vein, the FHA should have a detailed  
understanding of the impacts along the entire stretch before granting funding for just one piece of  
the proposal.

Without consideration of cumulative or similar impacts, the agencies might approve funding or permits for just this portion of the project, locking in the design for the other half of the project, without a full understanding of the impacts of the entire project on existing businesses.

E. Alternatives to be Considered in the EIS.

37-23 The alternatives analysis is the "heart of the EIS." 40 C.F.R. §1502.14. The EIS must include  
"actions that could feasibly attain or approximate a proposal's objectives, but at a lower  
environmental cost or decreased level of environmental degradation." WAC 197-11-440(5)(b).  
Here, the alternatives studied within the EIS should have included "Alternative 1," which was  
presented and analyzed in the Aurora Multimodal Predesign Study. However, to ensure that  
"Alternative 1" would feasibly attain or approximate the objectives of better traffic access and  
circulation, improvement of economic development, and limiting the right-of-way needs and impacts  
on existing businesses, the sidewalk widths for that Alternative should be changed from 12 to 16 feet  
to 5 feet.

The City Council, the Citizens Advisory Task Force, and the Interagency Technical Advisory Committee, after several meetings and open houses, spent considerable time developing alternative proposals for improvements to the corridor based on certain objectives defined by them. The CATF

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and ITAC apparently brainstormed in response to the question "What issues do I want to see addressed in the Aurora Corridor Project?" and, through an interactive process of mindmapping, the members provided information that provided guidance for a consultant team to prepare design options to support the group's objectives.<sup>3</sup> The group then analyzed the issues as related to potential design options. The City put together a complete collection of design investigation technical memoranda, along with the predesign study. Each member of the CATF and ITAC was then provided with the design option memoranda and, after several sessions of discussion, the CATF began assembling design alternatives. From that process, four alternatives for improvement of the Aurora corridor were developed, one no-action alternative and three that included some measure of improvement over existing conditions. Those were then presented within the Multimodal Predesign Study. Despite the level of work that was put into developing alternatives, the DEIS considers an alternative that was not one of the three developed by the process above -- "Alternative B."

37-24 "Alternative 1," presented in the Multimodal Study, was completely different from "Alternative B." "Alternative 1" proposes four general traffic lanes through the corridor, with medians installed only at intersection approaches. Segments of the center two-way, left-turn lanes would be retained. The SMA requests that the EIS analyze "Alternative 1," but with a decrease of the size of the sidewalks from 12 to 16 feet, to less than half that size, so that the proposal would meet the goal of promoting economic development and limiting the right-of-way needs and impacts to existing businesses.

37-25 The SMA traffic expert, Ken Cottingham, has prepared an "Alternative C" as well. Considering that this alternative best represents a proposal that meets the purpose and need of the project, while improving safety and traffic congestion and lessening the adverse impacts to local businesses, it should also be considered in the EIS.

#### F. Right-of-way Issues

The EIS will be relied upon for the City's decision on the right-of-way permit. When a decisionmaker considers a final decision on a proposal, the impacts and alternatives discussed in the EIS must be considered. "The range of alternative courses of action discussed in EISs shall encompass those to be considered by the decisionmaker." WAC 197-11-402(9). See also WAC 197-11-655(3)(b).

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<sup>3</sup> While the study indicates that the public and businesses were invited to add to the issues represented on the mind-map, SMA feels strongly that they were left out of the process and that their objectives and comments were disregarded entirely. Other comment letters from the members of SMA describe this in more detail.

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37-26 The standard of review for a right-of-way permit, which triggers environmental review, requires the City to consider whether the proposal would serve the public needs and the overall interests of the City residents. SMC 12.25.070. Before approving the permit, the City must find that the City's proposal for a right-of-way permit would "serve the public interest." SMC 12.25.070. Therefore, the EIS must analyze the public needs and the overall interests of the City residents and the impacts of the proposal and the alternatives to those needs and interests.

G. Significant Adverse Impacts of the Proposal were not Adequately Disclosed or Analyzed

The EIS must disclose and analyze the environmental impact of a proposed action and any adverse environmental effects which cannot be avoided should the proposal be implemented. RCW 43.21C.030(2)(c). Agencies are required to "carefully consider the range of possible impacts, including short-term and long-term effects." "Impacts must include" those that are likely to arise or exist over the lifetime of a proposal or, depending on the particular proposal, longer." WAC 197-11-060(4)(c). A proposal's effects include direct, indirect and cumulative impacts caused by a proposal. Impacts include those effects resulting from growth caused by the proposal, as well as the likelihood that the present proposal will serve as a precedent for future action. WAC 197-11-060(4)(d).

The range of impacts to be analyzed in an EIS (direct, indirect, and cumulative impacts, WAC 197-11-792) may be wider than the impacts for which mitigation measures are required of applicants. WAC 197-11-660.

37-27 The EIS should not portray the process so far as being the result of significant community input and agreement. Several citizens, including members of SMA, disagree strongly with implementing Alternative A or B and have considered the process so far to be problematic in that the final decision on how Aurora should be improved appears to have been made several years ago, and any "public input" that was inconsistent with what the City Council wanted to do from the beginning was disregarded entirely. The EIS should reflect this perspective of the community.

The EIS has not adequately considered the impacts of this proposal to air quality; surface water (movement/quantity/quality); groundwater (movement/ quantity/quality); habitat for plants, fish, or other wildlife; the built environment (noise, releases or potential releases to the environment affecting public health, such as toxic or hazardous materials); land use (socioeconomic impacts on businesses, relationship to existing land use plans and to estimated population); traffic; and public services and utilities (fire, police, and schools).

37-28 Overall, the limitation of consideration of impacts of this proposal to only 50 feet outside of the right of way is a gross violation of NEPA and SEPA requirements, considering that the agencies are

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required to consider all significant adverse impacts of the proposal and, clearly, as has been repeated in detail (and elaborated upon) by the comment letters submitted by SMA members and experts, this proposal will have significant adverse impacts well beyond 50 feet outside of the right of way. SMA members and experts have submitted letters that provide greater detail overall on the inadequacy of the DEIS analysis and disclosure of impacts than I provide in this letter. I incorporate those letters herein and touch upon general issues of concern with the DEIS.

1. Traffic

37-29 The DEIS did not adequately analyze the existing transportation conditions of the project area or how the proposal and alternatives will impact or change those conditions. As the comments of many members of SMA as well as Ken Cottingham reveal -- the DEIS provides only a one-sided and far too rosy perspective on supposed improvements to traffic congestion, safety issues, traffic capacity and operations, access management, the impacts of right-of-way acquisition, the impacts of construction within existing right-of-way, the impacts of loss of parking, the need for additional capacity at intersections, traffic spillover onto streets other than Aurora, construction and maintenance costs, access to and from the city, level of service at intersection, accommodating future traffic forecasts, traffic delays, and traffic safety -- ignoring likely significant impacts related to each of these issues.

37-30 The DEIS should have devoted more time to the adverse impacts on existing businesses caused by traffic impacts. A major corridor improvement project can disrupt businesses during construction and affect local access to businesses once the construction is complete. For the Aurora Corridor Project, the disruptions from an extended period of construction along the corridor and restricted left-hand turns once the construction is complete present forces of negative impacts to local businesses. The loss of parking will also contribute to these impacts. In addition, property values along the corridor could change as a result of the project. Changes in long-term traffic patterns could change the desirability of the land for commercial uses.

2. Land use

The DEIS failed to consider the true adverse impacts of this proposal to the existing business community on Aurora and how the proposal and the alternatives will change or affect the existing land use.

37-31 The widening of the public right of way for the proposed project could potentially reduce the size and usefulness of adjacent parcels to such an extent that it will seriously diminish the value of those parcels. Furthermore, the widening of the public right of way, and new development within the right of way, may force businesses to remodel, remove parking, move signs, or make other changes, and

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37-31  
CONT. with a new development code, dramatically change what each business can do on its property. The increased use of the right of way and/or acquisition of additional right of way will not only cost the businesses in direct loss of space and use of that area, but each business will be forced to incur costs to make their properties consistent with the new code.

### 3. Water, streams, and fish habitat

As will be elaborated upon in the comments submitted by Tom Holtz and SMA members, the DEIS did not adequately consider stormwater quality and quantity impacts, surface water quality and quantity impacts and groundwater quality and quantity impacts.

37-32 As the DEIS reveals, this project will directly impact all three major watersheds in the City of Shoreline: the Boeing Creek watershed; the Thornton Creek watershed; and the McAleer Creek watershed. The Aurora corridor falls on the dividing line between the Boeing Creek watershed and the Thornton Creek watershed. All of these creeks provide important fish habitat, and Thornton Creek and McAleer Creek have been the focus of considerable attention over the last years as they provide important habitat for species listed as priority species and/or threatened/endangered species under the state law and federal laws. At N. 192<sup>nd</sup>, on the north side of Aurora, is Echo Lake, which drains to Lake Ballinger. Lake Ballinger is the headwaters of McAleer Creek, a chinook-bearing stream. As the comment letters submitted by experts and individuals show, the impacts to these areas were not adequately addressed in the DEIS.

### 4. Built environment

37-33 The DEIS failed to adequately consider the impacts of noise from construction of the project as well as potential releases of hazardous or toxic materials. This section provides general short conclusory statements with an alarming lack of detail.

37-34 The DEIS also fails to adequately consider the adverse impacts to businesses caused by the project as described above. The DEIS also fails to consider whether the proposed project represents the most efficient use of public dollars to meet Shoreline's infrastructure needs. The cost of the project is grossly understated for many reasons -- including cost of condemnation and cost of clean-up of hazardous waste sites. In addition, the EIS should look at how relocation of some or all businesses and loss of revenue experienced by other businesses will impact the City and citizens.

### 5. Air quality

37-35 Because the DEIS failed to adequately address the adverse impacts to traffic, it in turn failed to adequately address the adverse impacts to air quality caused by the traffic impacts of the proposal and the alternatives.

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H. The DEIS is Invalid because CH2M Hill has a Conflict of Interest

The EIS "shall" provide an impartial discussion of significant environmental impacts. WAC 197-11-400. It "shall" serve as a means of assessing the environmental impact of proposed agency action rather than justifying decisions already made. WAC 197-11-402. The credibility and validity of the analysis and conclusions in the DEIS are at issue because the consultant who prepared it, CH2M Hill, prepared the design of Alternative A and has a financial stake in the approval of funding and permits for this proposal.


37-36  
If the agency chooses to have a contractor prepare an EIS, that contractor must not have any financial or other interest in the outcome of the project. 40 C.F.R. §1506.5(c). A contractor with a known conflict "should be disqualified from preparing the EIS." 40 Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations ("40 Questions"), 46 Fed. Reg. 18226, 18031 (Council on Environmental Quality 1991). CH2M Hill has an incentive to promote the project because the City has designated CH2M Hill as the contractor to perform the work on the actual project itself. In addition, CH2M Hill was required to execute a disclosure statement specifying that it has no financial or other interest in the outcome of the project. Here, SMA has not seen such a disclosure statement.

I. Conclusion

In conclusion, on behalf of SMA, I appreciate the opportunity to submit these comments on the adequacy of the DEIS. Thank for your consideration of these issues.

Very truly yours,

BRICKLIN NEWMAN DOLD, LLP



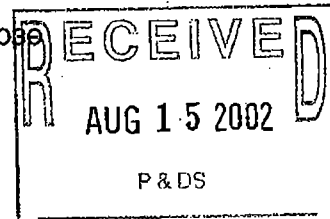
Claudia M. Newman

CMN:kmw/dab

cc: Aurora Improvement Council  
Ben Brown, Washington Department of Transportation

**COTTINGHAM TRANSPORTATION ENGINEERING**

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**Log # 38**

Mr. Timothy M. Stewart, AICP  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline WA 98133-4921

August 16, 2002  
Friday by 5:00pm

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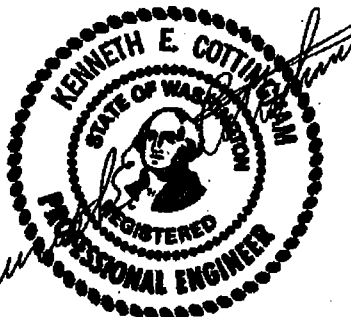
**RE: REVIEW OF DRAFT ENVIRONMENTAL IMPACT STATEMENT of July 9, 2002  
AURORA AVENUE NORTH, North 145 Street to North 165 Street**

Dear Mr. Stewart:

I have reviewed the above noted document, DEIS and have previously submitted comments regarding the content of this study prior to it's inception (letter of August 24, 2001). These comments were developed with others and from my own training, experience and education knowledge in transportation engineering and jointly with the Shoreline Merchants Association (SMA). This four page document was submitted for the August 24 cutoff date for items to be included in the scoping process for the DEIS. In a summary of my comments that also represented the SMA, were the following:

**[COPY ATTACHED]**

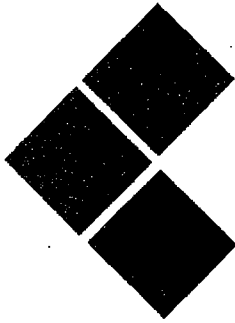
1. Project Purpose and Need
2. Description of proposal
3. Location of proposal.
4. Alternatives A and B.
5. Scoping/Public comments
6. Previous Studies of the multimodal corridor project.
7. Traffic Signal System.
8. Accident Analysis.
9. Summary.



#7355

EXPIRES  
03/16/03



**REVIEW OF DRAFT ENVIRONMENTAL IMPACT STATEMENT**

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**AUGUST 24, 2001 SUBMITTAL**

38-1 It appears that very little was inputted into the DEIS of the above comments. At the top of the list would be the unreasonable section of a one mile DEIS for a three mile section. Wherein the one mile must depend upon operational features that are contained in the total three mile area. This would be true as it relates to drainage, signal system interconnection, impact of east/west streets outside of the one mile corridor that will input traffic origin and destination within the total three miles, including the one mile section and the termination of the first mile section at North 165 Street, a minor cross street that is intended to be signalized by the City. This section cannot stand alone without addressing the full three mile section and was not adequately considered in the DEIS.

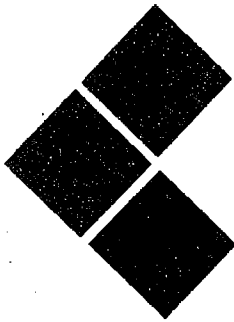
**N. 165 STREET TRAFFIC SIGNAL**

38-2 The inclusion of a traffic signal at North 165 Street is unreasonable and unwarranted for various reasons, but in particular because it violates the WAC 468-52-040, which states that signalized intersections spacing shall be one-half mile apart with signal progression. Neither the one-half mile requirement nor the signal progression requirement has been met by the DEIS. In order to keep the one-half mile requirement under Class 4 in the WAC, the traffic signal must be removed at N. 160 St. Thence we will have one-half mile spacing from 145 to 155, 155 to 165 and 165 to 175 and 175 to 185. Clearly the three-mile section should have been considered in order to properly apply WAC 468-52-040, and the need for traffic signal progression must be identified as feasible. It will not be feasible under the proposed plan and was not addressed in the DEIS.

**BAT LANES AND LEVEL OF SERVICE (LOS)**

38-3 The BAT lane (business and access lanes) are "coined" in this description different than commonly used descriptions in the State of the Federal Standards and Guidelines. However, these two additional lanes will not be carrying thru traffic, only busses and turning. With very little bus traffic [estimated by others that one bus line each way], there will be little if any, increase in capacity of Aurora. Capacity calculations in the transportation literature envision a right only or left only lane as

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**REVIEW OF DRAFT ENVIRONMENTAL IMPACT STATEMENT****Page 3****#2034-1****August 16, 2002**

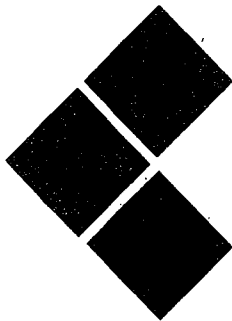
38-3  
Cont. improved capacity, along with the thru lanes and the traffic signal timing. However, a continuous lane that is simply right turning and busses in each direction will not significantly improve capacity on Aurora Avenue beyond the right turn lane and has not been addressed to properly in the DEIS.

**LEVEL OF SERVICE (LOS)**

38-4 The level of service indicated in the report gives the reader a misleading result. Many of the intersections in which only the side street capacity of the LOS F are indicated and to the untrained eye, attempts to relate this to the LOS of Aurora Avenue, when it does not. These two items, namely BAT lanes and LOS are erroneously described and misleading in the DEIS and should be rewritten to indicate capacity levels on Aurora and exactly how they will be increasing capacity, when in fact only a capacity decrease by the addition of traffic signals, such as North 165 Street. BAT lanes do not improve capacity over right turn lanes and LOS of Aurora does not increase with Alternate A or B.

**ALTERNATE C**

38-5 An Alternate C was recommended in the submittal of August 24, 2001, and reiterated at the August 6, 2002 public hearing. Nothing in the DEIS indicates that Alternate C received any consideration. Reference was made to a close approximation to Alternate C in the DEIS and rejected. However, Alternate C is a valid method of constructing Aurora to improve capacity and safety, without additional signals at North 165 and other locations, and with pedestrian crossing protection in a median island. This was clearly presented by this writer and SMA contributions, and erroneously rejected even though it fit within the right-of-way and at considerably lower cost. The DEIS failed to properly evaluate the input from the public as well and glossed over the important parts of improving capacity and safety on Aurora Avenue. Erroneous interpretation of WSDOT Design Standards and the WAC lead to elimination of Alternate C.



**REVIEW OF DRAFT ENVIRONMENTAL IMPACT STATEMENT**  
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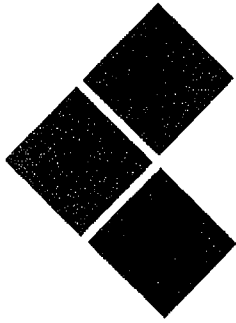
**CATEGORICAL EXCLUSION**

38-6 The original submittal of this project to WSDOT and FHWA was a Categorical Exclusion (CE) which was denied by FHWA and covered North 145 Street to North 165 Street, a one mile section of SR99, Aurora Avenue in Shoreline. The CE was rejected by FHWA as not representative of the project. Major transportation elements were deleted from the present DEIS, namely the heaviest accident intersection within Shoreline at North 175 Street. This obvious "working around" the problem areas and bringing in sections that have unimportant termini such as North 165 Street, fragments and defuses persons who may wish to comment on the full section of North 145 to North 205 Street. Clearly this is not an appropriate place to break up a three mile project into one mile sections and this tactic should be unacceptable to the reviewers of the DEIS. The DEIS has failed to present a workable section that can stand alone and by itself under the description of project contained in the DEIS.

38-7

**WASHINGTON ADMINISTRATIVE CODE (WAC) 468-52-040**

38-8 A major fault in the DEIS is the application of WAC 468-52-040 in which a Class 4 Highway has been designated by WSDOT to include this section of SR99. A careful reading of the Class 4 requirement includes a non-raised, non-restrictive median. However, a misinterpretation of this median by the DEIS then precludes consideration of other alternates by stating they do not meet design requirements. This is not so, and a re-reading of this as attached, clearly indicates "highways in this class are typically distinguished by existing or planned non-restrictive medians". The DEIS failed to use proper analysis of the WAC and continued to reject alternates that did not have raised medians. Another misinterpretation of the DEIS is the speed limit. Clearly within the plans for Aurora, year 2020 is stated several times as the target year and design year. Clearly the 40 mph existing speed limit will more than likely than not, and more probable than not, be 35 mph from end to end. Since the design year is the proper standard for evaluation of the WAC, some mention should be made of the 35 mph speed limit since it has been advocated by the various groups including SMA, to be the speed limit posted for Aurora Avenue 145 to 205. No mention of this is made and the DEIS has failed to discuss the speed limit classification in Class 4 Highways. The value engineering study completed in mid 2001 also recommends 35 mph speed limit.

**REVIEW OF DRAFT ENVIRONMENTAL IMPACT STATEMENT**

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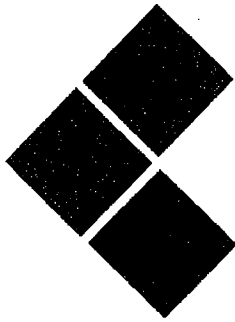
Further on in the WAC is a statement that "it is imperative that the location of any public access be planned carefully to ensure adequate signal progression". "Where feasible, major intersecting roadways that may ultimately require signalization shall be planned with a minimum of one-half mile spacing." "Addition of all new connections, public or private, that may require signalization will require an engineering analysis signed and sealed by a qualified professional engineer, registered in accordance with Chapter 18.43 RCW." This has not been done in the DEIS even though WSDOT indicates that the WAC shall apply to the design standards. It seems incredible that the State should sign off on this DEIS when in fact, it violates their own State Law in WAC 468-52-040.

**[COPY ATTACHED]****DEVIATIONS TO STANDARDS**

It is well recognized that "deviations" to various standards can be requested through the State WSDOT. However, no mention of deviations has been mentioned, nor has the City indicated any involvement in initiating such deviations, such as may be required for the 30 to 35 mph bracket range in the WAC. Clearly this is done on many projects in which deviations are requested and normally with supporting data approved by WSDOT. No such mention in the DEIS is there any indication of the deviations that may be requested or needed in order to construct the one mile of the three mile project. With the City holding the request for deviations and not providing such requests, the State has a problem in responding to the DEIS when in fact data is not submitted by the City.

**ACCIDENTS - PREVIOUS YEARS ANALYSIS**

The accident analysis in the DEIS does not show the correct numbers of accidents in Shoreline, and therefore in presenting the calculations, comes up with the erroneous number of accidents per MVM (million vehicle miles of travel). Throughout the DEIS is the indication that Shoreline is the highest accident rate in the State, of which no supporting data shows this accident rate except the calculated erroneous 8.30 MVM. None of these accidents can be attributed to a raised median or a two-way left-turn lane, flush median. Only by going through the original accident recording system can this data be applied to this project, and it is very time consuming and was, more likely than not, rejected the time-consuming effort during the preparation of the DEIS. However, the importance of a



## REVIEW OF DRAFT ENVIRONMENTAL IMPACT STATEMENT

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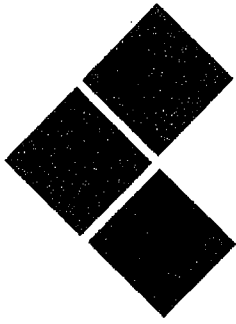
38-  
12 raised median versus a flush median usually relies on a safety feature in which accidents are a major portion of the analysis. There is no indication that a raised median or a flush median will increase or decrease accidents on Aurora Avenue in section of one mile, or section of three miles. The only reference is that it will "increase safety by reducing injuries and fatalities". There is no support to this in the DEIS, and in a further analysis of the same data by this author, there is no substantial evidence that this would or would not change the accident rates. The DEIS infers improved safety but does not offer any data to support the claim.

38-  
13 Figures produced by WSDOT for 1999 and 2000 shows that accidents are decreasing all in the Shoreline section of SR99, including the accident rates, fatalities, injuries. This same data is available in our office and is substantially correct except that we calculated on 6.08 MVM, which is far lower than the 8:30 MVM contained in the DEIS. Clearly the accidents have been overstated by the DEIS and based on erroneous information or analysis.

38-  
14 In the high accident corridor by WSDOT (HAC) there are no listings for SR99 Aurora Avenue in the City of Shoreline in the 71 locations listed. However, the DEIS indicates this is a high accident corridor for the northwest region of WSDOT, and it is not so when based on 1996 thru 2000 collision data, [which includes partial years for 1997 and 1998]. The DEIS misstates and misquotes figures when referring to HAC, since none of these accidents in the list occur in the three mile section for the City of Shoreline, nor the one mile section. While traffic is increasing, pure numbers of accidents on SR99 Aurora have decreased from previous years when comparing to 1999 and 2000. [COPY ATTACHED]

When comparing HAC corridors statewide and based on the same 1996 thru 2000 [and the partial years of 1997 and 1998], we find no entry in this list for the City of Shoreline, SR99, Aurora Avenue North. The DEIS does not include, but only infers that the high accident rate for Shoreline is on SR99, when in fact it is not one of the highest and is one of the lowest for an arterial of its type.

The cost of accidents is another way of looking at the same accidents and in a review of just 1999 and 2000 from WSDOT, the 'societal' costs of accidents is the highest in the State on Interstate 5 Near the Tacoma Dome vicinity at \$11,544,000 per year. In this same listing, Shoreline is number 22 from the top at \$2,456-500 per year, near North 175 Street. However, this intersection is not included in the DEIS since it cuts off at North 165 Street. Shoreline once again shows up in this same listing as

**REVIEW OF DRAFT ENVIRONMENTAL IMPACT STATEMENT**

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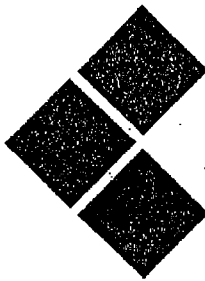
August 16, 2002

number 31 from the top at \$2,188,000 per year, in the vicinity of North 155 Street and is number 40 on the same list, at \$2,045,000 per year, also at the vicinity of North 155 Street. Shoreline does not appear again in the list when looking at the top 150 intersections. An analysis of the separation of these areas and the commonality of the locations should have been discussed, and was not, and gives the wrong impression to the lay person or engineer reviewing these figures as to the real cause and costs of accidents. The DEIS did not consider this in a manner that would be useful to the reader, nor objective to the proposed project. However, it should be noted that Priority 22 includes North 175 St. which is listed as between Mile Post 41.71 and Mile Post 42.11 and has \$2,456,500 'societal' accident costs and is not included in the first Aurora section. Clearly this is reason enough for including North 175 Street in the present project in order to attack the first and highest costs accident location, but it has been left out of the N. 145 to N. 165 section. [COPY ATTACHED]

**VALUE ENGINEERING STUDY**

The Value Engineering Study that was done in June of 2001 by the firm of Value Management Consulting, Incorporated, recommends several items that would reduce the cost of the Aurora project. One of these recommended items was the State to reduce the speed limit to 35 mph now rather than later. This would reduce the cross section by using standards appropriate to the 35 mph speed limit. It also asks for 11 foot interior lanes versus the 12 foot, reduce the width of sidewalks adjacent to walls, use the outside lane for bus, HOV, and right turn movements, and other improvements and changes to the project that would considerably reduce the cost of the Aurora Corridor. The DEIS does not adequately address to the recommendations nor the cost saving of the Alternate C that would have included nearly all of the Value Engineering recommendations. The recommended items will improve capacity and safety if adopted by the City and State but were not addressed in the DEIS.

Attached are additional accident listing pages to support the above review. These attached pages are from WSDOT and prepared by the keepers of the accident reports and the computer listings as presented herein. Enclosed are "Draft Comments of Draft EIS" dated August 8, 2002. Rather than reprint the DEIS, reference is given on each comment such as Attach Page XYZ here to indicate the pages in the DEIS the comment is applicable. Some of the comments may duplicate or reiterate items contained in this letter.

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Mr. Timothy M. Stewart, AICP  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Avenue No.  
Shoreline, WA. 98133-4921

August 24, 2001

#2034-1

RE: SEPA NOTICE, AURORA CORRIDOR PROJECT

Dear Mr. Stewart:

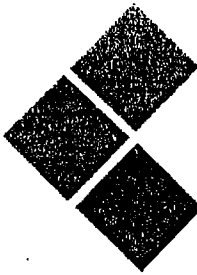
38-17 It appears unreasonable for the DEIS (Draft Environmental Impact Statement), be prepared for only 1/3rd of the 3 mile section in the City of Shoreline. Although construction projects may be identified as specialty work within a 3 mile section and therefore be an economical approach for either 2,3, or even 4 projects, it is unreasonable to put the same burden on the public and breakout 3 or even more sections for an Environmental Impact Statement when each section relies heavily on the adjacent section for input into the items to be studied.

We have reviewed the Interurban Trail which parallels very closely on the east to the Aurora Corridor and noted that it's entire length has been given to the public in a scoping as North 145th Street to North 200th Street. At that point, it will join a City street system to go into Edmonds at North 205th Street. Aurora similarly has continuity through the 3 mile section of North 145th to North 205th Street, and the communality of items to be addressed in the DEIS will dictate that only one study be done in order to insure knowledgeable input to the citizens and to incorporate the necessary abutting trail of the Interurban Trail.

38-18 PROJECT PURPOSE AND NEED: There is no unusual or precluding argument that would allow the breakup into the small sections of 1 mile each when the total Aurora Corridor is only 3 miles in length, has thru traffic continuity, and most importantly must be considered as a single element with its abutting properties, cross streets, driveways and traffic signals that must operate on a common system between Seattle and North 145th and Edmonds at North 205th.

This is the missing link between Seattle and Edmonds and it will divide the community such as to get response on one section that may or may not be appropriate for the other sections. Although each respondent can address to a specific cross street or abutting ownership, the total impact for the 3 mile section should be considered at one time, and with one set of abutting owners and developments. At the present time Top Foods is actively preparing their site on North 175th Street, just east of Aurora. Certainly traffic diversions and generations of traffic should be considered in the total context of traffic on Aurora Avenue for the 3 mile section. Any effort to break out a 1 mile section and still attempt to use generated traffic from the next section will be inconclusive, confusing, and probably not possible to do under the constrictions of the present wording of the SEPA Notice.

38-19 When Resolution #156 was approved, the project limits included No. 145th St. to No. 205th St. as stated on Exhibit "A". When the Aurora Corridor-Pre Design Study was approved as Exhibit "B" it included the Citizens Advisory Task Force recommendations that covered No. 145th St. to No. 205th St. in the 32 listed improvements desired. The frequently asked questions by the City of Shoreline with answers thereto covers the 3 mile section from No. 145th St. to No. 205th St. Continuity of route makes the entire route inseparable for the DEIS in the 3 mile Aurora Corridor.



Mr. Timothy M. Stewart, AICP  
SEPA Responsible Official  
Page Two

August 24, 2001

RE: SEPA NOTICE, AURORA CORRIDOR PROJECT

38-20  
DESCRIPTION OF PROPOSAL: The origination of the term BAT LANES (Business Access Transit), unfairly describes that these are HOV Lanes under the description of the MUTCD, and will be so marked and not available for ordinary thru traffic. It may be innovative to call them BAT LANES, but it is not in keeping with terminology used in transportation for restricted lanes. The description given in the SEPA Notice implies that all traffic may use these lanes if they intend to go to a business, which of course nearly all traffic is bound to do. However, these lanes will be filled with traffic that under the terminology BAT, does not indicate the signage, the markings, or the enforcement that will be utilized in the right lane Northbound and Southbound.

The very inclusion of these specialty lanes in the proposal thru the whole 3 mile section indicates the need for a 3 mile section EIS and not to put it off as 1 mile sections in which different arguments can be used for different sections, and therefore tend to confuse and misinform the public on the true purpose of the EIS. Once again, construction contracts can separate into smaller sections and with specialties into sub-contracting, but the whole project is North 145th to North 205th Street, City of Shoreline.

38-21  
LOCATION OF THE PROPOSAL: The location of this project should of course be North 145th to North 205th Street. This will give an opportunity for adverse effects as well as the beneficial effects of the project, or a "no build" project. Since major utilities go thru this section, a 3 mile section, it is near impossible to describe a 1 mile section of a major conduit that may be electrical, electronic, water, sewer, or high voltage without addressing the whole length of the 3 mile corridor. A resort to a 1 mile EIS will not give a meaningful assessment to the public and will tend to confuse and separate issues into a meaningless document.

38-22  
ALTERNATIVES: Three items are discussed as "no action", "Alternative A", and "Alternative B"; the shortcoming here is that there is no "Alternative C", which would discuss the construction of the minimum standards to obtain funding that would provide all of the sidewalk, lane widths and turning lanes and be called "Alternative C". This "Alternative C" would meet the goals of Level of Service and abutting service to properties, but would be a less costly alternative that would incorporate the State's concerns in their "design manual" and provide 5' sidewalks, plantings and poles behind the sidewalks, curb and gutters, islands of sufficient width for all traffic, no raised islands, and right-in and right-out turning at non-signalized intersections. Cross traffic could be deleted from several more minor streets and should be addressed in the DEIS as an "Alternative C". This alternative would stay well within the present right-of-way of Aurora Avenue and still provide the amenities, widening, special lanes and turning lanes as envisioned in the other options, but do so at a minimum cost and a minimum disruption to the abutting owners. The terminology "may also be considered in the SEPA Notice", does not give enough assurance that IT WILL BE CONSIDERED, and will be considered as Option "C".





Mr. Timothy M. Stewart, AICP  
SEPA Responsible Official  
Page Three

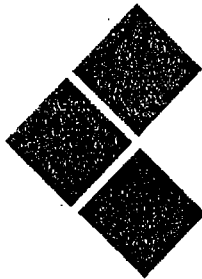
August 24, 2001

RE: SEPA NOTICE, AURORA CORRIDOR PROJECT

38-23  
SCOPING/PUBLIC COMMENTS: The initial notice of 21 days mislead the public and was such a short notice that it expired on August 16, 2001. We understand by the grapevine that August 24th at 5PM is now the closing time of this notice. Received in the mail on Saturday 081801 is a fold-out indicating that the final date is August 24th at 5PM, 6 days after receiving in the mail a notice and received on a weekend. This type of notification is what the group, that I am retained by, have been faced with since the beginning of all projects on the Aurora Corridor. It is far too short a notice for anyone who is on vacation and we note that many of the City employees being requested for answers are also on vacation. This 6 day notice of which 2 of the 6 days fall on weekends could not be considered relevant notice, and in fact far short of even customary courtesy or normal procedures for the City of Shoreline. These short notices unnecessarily complicate the procedure, our responses, and tend to build distrust into the system for receipt of timely and proper notice. This date of August 24th at 5PM should have at least a 30 day response time if not longer for all professional courtesies and in accordance with practice and procedures of the City of Shoreline.

38-23A  
PREVIOUS STUDIES OF THE MULTI-MODAL CORRIDOR PROJECT: A review of Phase 1 dated May 11, 2001, by CH2M, the total project for the City of Shoreline is described as "North 145th, North 175th and North 205th." This appears in the introduction of the document under "Project Information". This write-up of course was done for the previously rejected Categorical Exclusion which has not been denied. However, the terminology is correct in that the total Corridor is North 145th to North 205th and as stated several times in the CH2M Study.

38-24  
TRAFFIC SIGNAL SYSTEM: It has been long recognized that a traffic signal system is required on heavily traveled major and principle highways of which Aurora Avenue is one of these. A system which is now in effect will need modification but it does connect North 145th Street thru North 205th Street as a common length and with a master computer controller that controls the mini sub-frame computers at each of the signalized intersections. To break this into three 1 mile sections or even into two 1-1/2 mile sections is inconceivable in the analysis of the progression of traffic peak and off-peak thru the Aurora Corridor. Only a DEIS that includes the total 3 mile sections will be viable and only with knowledgeable engineering will this progression and calculation of peak-hour, splits for east/west traffic, turning volumes, and the green-band progression thru the 3 mile section be possible. Shorter sections will not work in a study of this type, it needs the total 3 mile section, and more.



Mr. Timothy M. Stewart, AICP  
SEPA Responsible Official  
Page Four

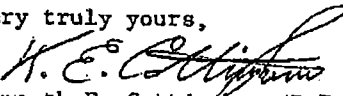
August 24, 2001

RE: SEPA NOTICE, AURORA CORRIDOR PROJECT

38-25  
ACCIDENT ANALYSIS: Traffic accidents kept by the State on the 3 mile section of Aurora are broken into two section, namely SR 523-North 145th Street to North 175th Street, and thence 175th Street to SR 104, Snohomish County North 205th Street. Those two sections are the only breakdown in the Washington State Department of Transportation Accident Printout. Further breakdowns by Mile Post is possible for the entire section. An analysis of the accidents for only 1 mile of the section of road, namely 145th to 165th, does not adequately provide accident rates, fatality rates, and injury rates that can be compared rationally with other sections of the road, it's just too small a section. For this reason, accidents throughout the entire area, and as related to intersection, non-intersection, and driveways needs to be done. However, this analysis will not give adequate information as to whether raised islands or painted islands have an effect on the accidents since that information is not kept. A more detailed examination of the original accident sheet as filled out by the investigating officer, needs to be done in order to adequately assess sections on a 3 mile section basis and as related to raised channelization which is now existing in some areas versus the non-raised channelization. This has not been mentioned in the SEPA Notice but certainly should be considered because there will be some indication and recommendation as to channelization made in the design and construction of the Aurora Corridor, North 145th Street to North 205th Street.

In Summary, the SEPA Notice falls far short in it's introductory as noted in the August 2001, Volume 3, Aurora Corridor mailer. The alternatives discussed fall far short of giving a full evaluation and need to be amended with items contained in this report as well as others being prepared on other items of soil, air quality, noise, chemicals, water, social impact, economic, traffic and safety. The organization that I am providing services to want to have a 7 lane Aurora with sidewalks and with the right-of-way of Aurora Avenue. It can be done and it can be done at a cost that is acceptable to all and within the standards for the maximum traffic flow, noise and pedestrian amenities. Under the present scope envisioned for the EIS, it will not be adequate unless amplified by the enclosed comments.

Very truly yours,

  
Kenneth E. Cottingham, P.E.  
Transportation Engineer

KEC/RM<sup>2</sup>



#7322

EXPIRES  
03/603

## DRAFT COMMENTS OF DRAFT EIS

August 8, 2002

38-26 | A & B alternates are raised medians and there is no SMA alternates. This shows on page V. [Attached are the three fact sheets (V, VI, VII) before the Table of Contents, from the Draft Environmental Impact Statement of July 2002]

From this point on, the DEIS ignores all prior timely input to have alternates considered by businesses and citizens that would add lanes and sidewalks to SR 99 Aurora Avenue that would offer equal or better capacity and safety for drivers, and meet all standards and requirements.

## DRAFT COMMENTS OF DRAFT EIS

August 8, 2002

38-27 | Page XVII Summary and description of the alternatives considered show the two raised medians. Alternatives A & B but with a poor description in that it doesn't give total outside to outside width, and therefore leaves the reader not knowing that the number of lanes or the total width can be considered. Once again no SMA is given here. [Attach page xvii here.]

## DRAFT COMMENTS OF DRAFT EIS

August 8, 2002

38-28 | Page XXIII Indicates that there is substantial traffic congestion, unsafe pedestrian facilities and unsightly commercial strip development. There is no indication that any alternate or the no-build alternate would be any improvement to this. The accident  
38-29 | statistics do not support improved capacity and safety by either alternate over no build.

38-30 | The DEIS misleads and misuses "traffic congestion" without identifying the background data to support the statements. [Page XXIII attached]

Page 1-1 The vehicular safety paragraph indicates 8.3 crashes per million vehicle miles (MVM). Our calculations when deducting those in Edmonds and in city of Seattle show that in the two years, 1999 and 2000 calculate to be 533 crashes for those two years and results in 6.08 crashes per million vehicle miles (MVM). This is considerably different and the basic calculations are not provided for proper analysis.

38-31 There are no accident figures for 1997 & 1998 and also previous are the four years that include 1993, 1994, 1995 & 1996. Looking at these accident figures, we see that accidents are decreasing and the state acknowledges that they are decreasing based on the 1999 & 2000 figures. The published annual report from WSDOT shows 1993 thru 1996 as 7.9 accidents per MVM for four years, with the last year of 1996 as 7.5 MVM, a lowering of the rate. Then the only following full year figures are for 1999 & 2000, and shows a substantially lower rate of 6.08 for the entire Aurora Corridor of N. 145<sup>th</sup> to N. 205<sup>th</sup> Streets. Clearly the 8.3 accidents per MVM in the DEIS misstates the accident rates which are then used to support the erroneous concept that safety is needed on Aurora when we are now experiencing a safer Aurora with the present traffic and road-way geometrics.

[Attach page 1-1]

## DRAFT COMMENTS OF DRAFT EIS

August 8, 2002

38-32 Page 1-3 Under legislation, Aurora is designated as a class 4 facility according to WSDOT. This is in reference to WAC-468-52-040 and it is agreed that the class 4 is correct; however, what is not stated is that for urban roadways of 30 to 35mph, a non-restrictive median is existing or planned. The DEIS erroneously indicates medians without specifying that they can be non-restrictive existing or planned medians. Also the sped limit is not discussed in this paragraph which should be 30 to 35mph and has been left out of the description of the WAC.

The DEIS repeatedly states that a non-traversable median must be utilized on Aurora Avenue and as included in Alt A and B. A careful reading of the authority of WSDOT is to be found in WAC 468-52-040 which states that a class 4 highway (as WSDOT agrees) is "typically distinguished by existing or planned non-restrictive in Alt A and B. This error permeates and destroys the entire DEIS by stating the driving force to eliminate viable alternates is a non-traversable or raised median. This is not so and the WAC 468-52-040 speaks for itself.

38-33 The intersection spacing for Class 4 highways between signals shall be planned with a minimum of one-half mile spacing. Signal progression must be ensured and carefully planned. However, the spacing proposed between N. 160<sup>th</sup> Street existing signal and the proposed signal at N. 165<sup>th</sup> Street violates this one-half mile spacing by placing the signals one-quarter mile apart and is not addressed in the DEIS.

[Attach page 1-3 & WAC 468-52-040]

## DRAFT COMMENTS OF DRAFT EIS

August 8, 2002

38-34

The traffic signal at N. 165<sup>th</sup> Street will attract and divert traffic from N. 160<sup>th</sup> Street signal, which now feeds to and from Shoreline Community College at Greenwood Ave and N. 160<sup>th</sup> Street. By adding the signal to Aurora at N. 165<sup>th</sup> Street, traffic will bypass the five legged intersection on N. 165<sup>th</sup> Street between Greenwood Avenue and Aurora. The present residential street of N. 165<sup>th</sup> Street will become an arterial in practice without the designation of such. The impact will be severe to this section of N. 165<sup>th</sup> Street from Greenwood Avenue N. to Aurora Avenue N. This impact has not been addressed to in the DEIS, but will be a negative impact that the residential district is not aware will occur.

38-35

Another omission to the DEIS are alternatives and impacts to traffic by not signaling N. 165<sup>th</sup> Street and therefore reduce East – West traffic with simple traffic control devices. Northbound and southbound left turns could be retained, but side streets would become right turn only. (Similar to N. 170<sup>th</sup> Street ). This impact and it's alternates are not addressed in the DEIS. Without a traffic signal at N. 165<sup>th</sup> Street and with traffic signals at N. 160<sup>th</sup> Street and N. 175<sup>th</sup> Street, the delays to Aurora Avenue will be lessened and the possibility of peak direction signal progression improved. This would truly increase capacity of Aurora Avenue and was not addressed in the DEIS. Additionally, the unusually low LOS F for N. 165<sup>th</sup> Street would be immediately revised to LOS B or better and at a lower cost. This easy to implement alternate is not considered in the DEIS.

## DRAFT COMMENTS OF DRAFT EIS

August 8, 2002

Page 2-2 Traffic volumes are indicated in this section that appear to be previous years and relatively low for the section. However, utilizing 40,000 ADT represents 160<sup>th</sup> to 165<sup>th</sup> Streets where we have the LOS - F. This is only because of the wait on the west leg and has nothing to do with the capacity or congestion on Aurora Avenue.

The impression is that this has much to do with the congestion described. It also goes on to explain that this is the highest traffic crash location when compared to the rest of the corridor.

38-36 On the next Page 2-3 is the quote HAL (high accident location) and PALS (pedestrian accident locations). N. 165<sup>th</sup> Street is indicated for one of these high accident rates, but in looking at the actual printout, N. 165<sup>th</sup> St. is one of the lowest in the whole corridor. Our calculations show 6.08 accidents per MVM, as compared to 8.3 in the DEIS. Our figures are an average for two years for the whole corridor of 145<sup>th</sup> to 205<sup>th</sup> Streets and are more accurately utilized based on the milepost method of recording. The DEIS only shows as low as 6.1 for that section from 165<sup>th</sup> to 205<sup>th</sup>. We question these figures as well as the HALS and the PALS. Since the last paragraph on Page 2-3 indicates N. 165<sup>th</sup> Street as a HAL and a PAL and the figures we have for 1999 & 2000 show this intersection to NOT be in those listings, we question the validity of the accident figures in the DEIS.

[Attach pages 2-2 and 2-3]

## DRAFT COMMENTS OF DRAFT EIS

August 8, 2002

38-37

Pages 2-5 thru 2-9 are alternatives from scoping and includes proposed alternatives submitted by the public during the scoping period. These should include those of SMA and have been rejected. Each of these is rejected based on erroneous application of the WAC - 468. Raised medians are not required under Class 4. One of the alternatives is rejected because of safe pedestrian crossings not included. However, the SMA did include safe pedestrian crossings more so than the draft EIS. It is also rejected because it does not meet WAC - 468.

38-39

Other alternatives are rejected because additional width of sidewalks compromises pedestrian environment and in some cases, safety. However, with the sidewalk, it has never been shown to correlate to safety with pedestrians and there is no reference as to that increased safety by the extra width sidewalk.

38-40

Continuing on Page 2-10, none of the alternatives described would meet the project's purpose and need so they have not been included in the document for full environment analysis. This has occurred because of erroneous application of the Class 4 WAC designation and that a non-restrictive or existing planned median could be installed under Class 4 and has not been considered as such.

[Attach pages 2-5, 2-9 and 2-10]

## DRAFT COMMENTS OF DRAFT EIS

August 8, 2002

38-41

Page 2 - 8 discards the alternate with seven foot sidewalks that more closely resembles the SMA proposal and the Cottingham Transportation Engineering proposal. However the erroneous analysis assumes it does not meet WAC 468-52-040 access requirements, does not improve traffic safety, does not encourage transit, among other erroneous conclusions. This Alternate does meet all of the above including more advanced methods of pedestrian crossing protection. Once again, the inappropriate WAC interpretation in this DEIS makes a gross error that continues throughout.

[Attach 2-8 and 2-9]



## DRAFT COMMENTS OF DRAFT EIS

August 8, 2002

38-42 | Page 2 – 10 Design alternative to meet full WSDOT design level describes a cross section that is nearly compatible and comparable to the SMA proposal, but does not describe the sidewalk width. Since part of the dimensions are left out it is impossible to tell the total width of this design alternative. The proposal goes on to discuss a four-foot wide outside shoulder for bike use. Since sidewalks and shoulders and total width are not described, this design cannot be analyzed by the average layperson much less engineers that find the missing figures and the descriptions. This alternative has been rejected and not included in the document for full environment analysis.

[Attach page 2-10]

## DRAFT COMMENTS OF DRAFT EIS

August 8, 2002

38-43 | Page 2 – 11 Both alternatives A & B consider a raised median except for signalized intersections where the left turns will be allowed and possibly some U-turns. No discussion was made of the fact that Class 4, Aurora Avenue, does not require a non-restrictive or planned raised median. This is on the basis of 30 to 35 mph speed limits. It is recognized that the present speed limit is 40 mph, but in all likelihood thru the design period and ten years in the future, 35 mph will be the speed. No discussion of the speed limit for this area has been addressed and the erroneous application of a non-restrictive existing or planned median is not discussed. Land use on Aurora is less probable to change in use and the ½ mile apart signals for progression will more likely than not be the case. The deletion of important parts of WAC – 468 allow limited analysis by layperson, much less engineers, as to what was considered for the final recommendation.

[Attach 2-11, Figure 2-2, 2-14, 2-15 and 2-16]

## DRAFT COMMENTS OF DRAFT EIS

August 8, 2002

38-44 The reported HALS & PALS on 3-6 and 3-7 are grossly exaggerated and are not the highest in the state and hardly qualify for priority treatment according to WSDOT's own figures. To indicate that Aurora is the highest in the state for an arterial of its type is erroneous and would lead the laypeople, as well as engineers, to question how these figures could be arrived at, based on the printout we have received from WSD OT which qualifies and quantifies those HALS & PALS much differently than the DEIS. Attach 3-6 & 3-7.

Additionally, from state records the highest accident corridor based on 1996 thru 2000 years, does not include Shoreline, Aurora Avenue, SR 99 in the top 71 of 77 locations in the entire state. Clearly Shoreline section of SR 99 is NOT a high accident corridor and is decreasing in more recent years. The DEIS does not address to this issue in a proper, unbiased approach.

38-45 The societal costs of accidents for 1999 and 2000 from WSDOT summaries show the highest in the state on SR 5 at the Tacoma Dome. Shoreline is number 31 and number 40 from the top of the list at \$2,188,000 and \$2,045,000 per year. However, N. 175<sup>th</sup> St. rates higher in societal cost of accidents at \$2,456,500 and rates number 22 or higher than N. 155<sup>th</sup> Street.

Shoreline, SR 99 does not appear again in the first 150 priorities!!!

[Attach pages 3-6 and 3-7]

## DRAFT COMMENTS OF DRAFT EIS

August 8, 2002

38-46

Page 3 - 7 Level of service (LOS) is presented as F at N. 165<sup>th</sup> Street is only side street delay and it is only for those vehicles wishing to cross Aurora. A simple right only from 165<sup>th</sup> Street would change the LOS to probably A, B or C, but has not been considered. Signalization at this point will only allow through east-west traffic and north and south left-turning traffic. No alternatives have been considered which is a requirement for signalization. A simple matter of a median and right only such as now exists at N. 170<sup>th</sup> Street will increase the LOS considerably, but has not been considered.

38-47

The accident record is almost non-existent for N. 165<sup>th</sup> Street in that the 1999 & 2000 have only a handful of accidents and no pedestrian accidents and no fatalities at this intersection. The DEIS fails to look and analyze the N. 165<sup>th</sup> project end point in a proper manner with alternates that will increase LOS without signalization and without turning the west leg of N. 165<sup>th</sup> Street into an arterial.

38-48

N. 152 LOS can also be dramatically improved by a right turn only which would nearly eliminate delay. The level "C" shown is erroneous as related to Aurora since no delay is experienced. However, the description on page 3-6 does not differentiate adequately Aurora LOS vs side street LOS, and therefore implies erroneous information in the DEIS.

[Attach 3-6 and 3-7]

## DRAFT COMMENTS OF DRAFT EIS

August 8, 2002

Page 3 - 9 U-turns are recommended for alternative B in that it will have slightly higher mid-block u-turn volumes. No discussion as to the lowering of safety by making a left turn at mid-block when they are all concentrated to focused left turn lanes versus two-way left turn lanes which spread them out over a distance. If u-turns are allowed mid-block at non-signalized intersections, they cannot be any safer than the two-way left turn lane and in fact, probably less safe due to the focusing of higher volume at specific locations. Additionally, the u-turn cannot be accomplished within the width provided by anything larger than a passenger vehicle or pickup. With curbs next to the sidewalk, a vehicle cannot encroach onto a shoulder as they do now. U-turns should be described in their proper mode as an unsafe maneuver and one that should be discouraged except at signalized intersections where additional width can be provided and traffic phasing provided for the turn. The focusing of left turns at intersections has the additional problem in that a u-turning vehicle will interfere with a side street vehicle making a right turn on red. The net result is no turn on red will be provided at the intersection, therefore reducing the capacity by allowing u-turns at intersections. Alternative A & Alternative B both will focus more left turners at signalized intersections and if the u-turn is provided, will seriously affect the capacity of the intersection, those same left turns and u-turns could have been made from the two-way left turn that now exists. None of this is discussed in the pages 3-8 nor 3-9.

[Attach pages 3-8 and 3-9]

## DRAFT COMMENTS OF DRAFT EIS

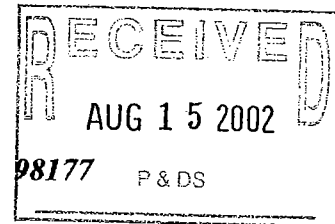
August 8, 2002

## DISCIPLINE REPORT TO DEIS --- August 2002

38-52 | On page 21 Operations under 2000 conditions states that LOS D is required by the City of Shoreline Comprehensive Plan. However, LOS E is stated in the DEIS on page 3-12 as LOS D as required in the Shoreline Comprehensive Plan. The DEIS does not clarify to the extent of avoiding confusion over the standard as LOS E or LOS D.

38-53 | Table 6 on this same page shows two unsignalized intersections as N. 152<sup>nd</sup> Street and N. 165<sup>th</sup> Street with LOS of B and B respectively and with only 12 and 14 second delay. This is highly unlikely and misrepresents the year 2020 delay, unless the intersections are reconstructed in some other way than described.

[Attach page 21 of Discipline Report]



**Roger-W. & Heidi-A. Day, 1035 -NW-166<sup>TH</sup> ST. SHORELINE, WA: 98177**  
**206-542-0900 / 546-1788 (FAX)**

RECEIVED

AUG 15 2002

August/22/2002

Aurora Corridor Responsible SEPA Official  
City of Shoreline  
15744 Midvale Ave. No.  
Shoreline, WA 98133-4921

CITY OF SHORELINE  
*Sharon Mattioli*

Dear SEPA Official,

This letter supplies vital information which will affect the Aurora Corridor Project if any surface water/ storm water accumulation is to be diverted, directed or otherwise placed into the Boeing Creek Drainage system. The focus of this letter concerns that part of the basin known as 'Reach 4" which extends West from Innis Arden Way to the Country Club Dam.

King County in pursuing its mandate to control stormwater runoff in the Boeing Creek Drainage Basin contracted with Brown and Caldwell for a series of stormwater Drainage Studies. Among the purposes of those studies was to determine basin capacities and flow rates, establish criteria for design standards and project solutions to enumerated challenges. Attached to this letter are selected pages from the Task B-1 study dated April 1980. This letter will direct your attention to selected portions of that study. The study can also be found in the files of the Dept. of Natural Resources, City of Shoreline.

The Brown and Caldwell report says on page 13-4:

"The natural channel capacity of the stream in the critical section has been identified as 12 cfs [cubic feet per second] (Task A-2, Appendix B). Model studies of flows indicate that peak flow rates at the critical section greatly exceed 12 cfs during the 25-year storm. Flow rate capacities in other reaches of the stream have been determined using the same critical noneroding velocity limit of 3.75 fps [feet per second]. It follows then that either the peak flow rate will have to be reduced or the stream channel will have to be increased to meet the criteria."

And further on Page 17 appears:

"Discharge to Boeing Creek west of Innis Arden Way would cause severe impact on the stream, whose noneroding channel flow limit is estimated to be 12 to 15 cfs."

King County failed to meet the criteria in its design of the North Pond. Flow gauge studies upon the completion of the Pond in 1991 and in the year following with the addition of the Saint Lukes' / Happy Valley neighborhoods in 1992 resulted in recording 24 rain events in a 31 day period of January 1992 and 26 rain events in November 1992 through January 1993 which resulted in flows

exceeding 12 cfs, the natural channel capacity limit. See two attachments labeled CP00347& 8. Boeing Creek channel was, with knowledge and warnings as to the consequences, overburdened by King County design, policy and construction.

As a direct result of the failure of the North Pond in January 1, 1997 the top half of Reach four suffered severe Destabilization resulting in major damage to public property as the streambed level dropped 6 to 8 feet causing major bank erosion and major landslides. Although an in-house review recommended settling four claims for damages, King County chose to ignore the problem and use its power in the courts to escape accountability. Reach 4 remains in its destabilized state and each year sees dramatic destructive changes. Boeing Creek channel continues to be overburdened by King County's neglect to repair the damages caused by the failure of the North Pond. The City of Shoreline is aware of the situation but claims lack of funding prevents any solution. The City of Shoreline seems to have money enough to make the problem worse, but none to make it better.

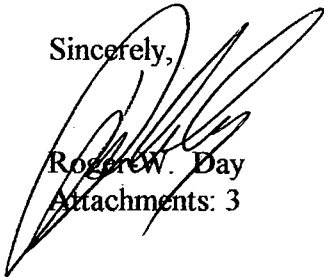
39-1

I believe that any additional flows into Boeing Creek from the Aurora Corridor will be a further contribution to the overburdening of the creek channel and will increase erosion creating a dangerous situation conferring liability on the City of Shoreline. Liability from overburdening of a channel and creating a dangerous situation are established legal tenants.

39-2

If any stormwater runoff from the Aurora Corridor is directed into the Boeing Creek Drainage System provision must be made for correcting the Destabilization and related erosion problems in Reach 4 as well as providing future protection. Repeating the conclusion of the Brown & Caldwell study: **"It follows then that either the peak flow rate will have to be reduced or the stream channel will have to be increased to meet the criteria."**

Sincerely,



Roger W. Day  
Attachments: 3

Figure 6. Boeing Creek Calibration -- Country Club Dam Gauge

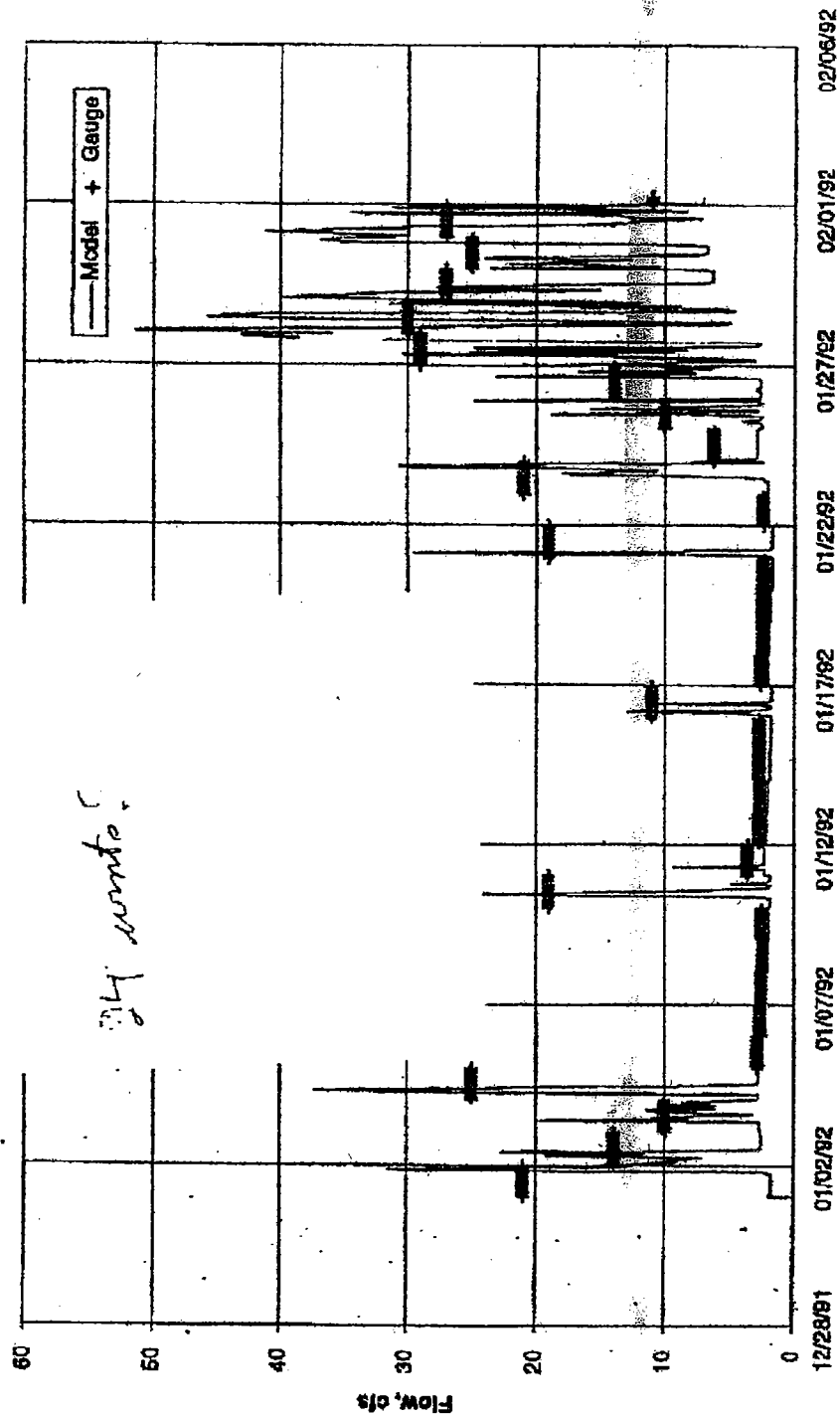


Exhibit-8: Brown & Caldwell: Storm-water-Drainage-Study: March 1993 (Mar./1993)

CP00347



Figure 7. Boeling Creek Calibration -- Country Club Dam Gauge

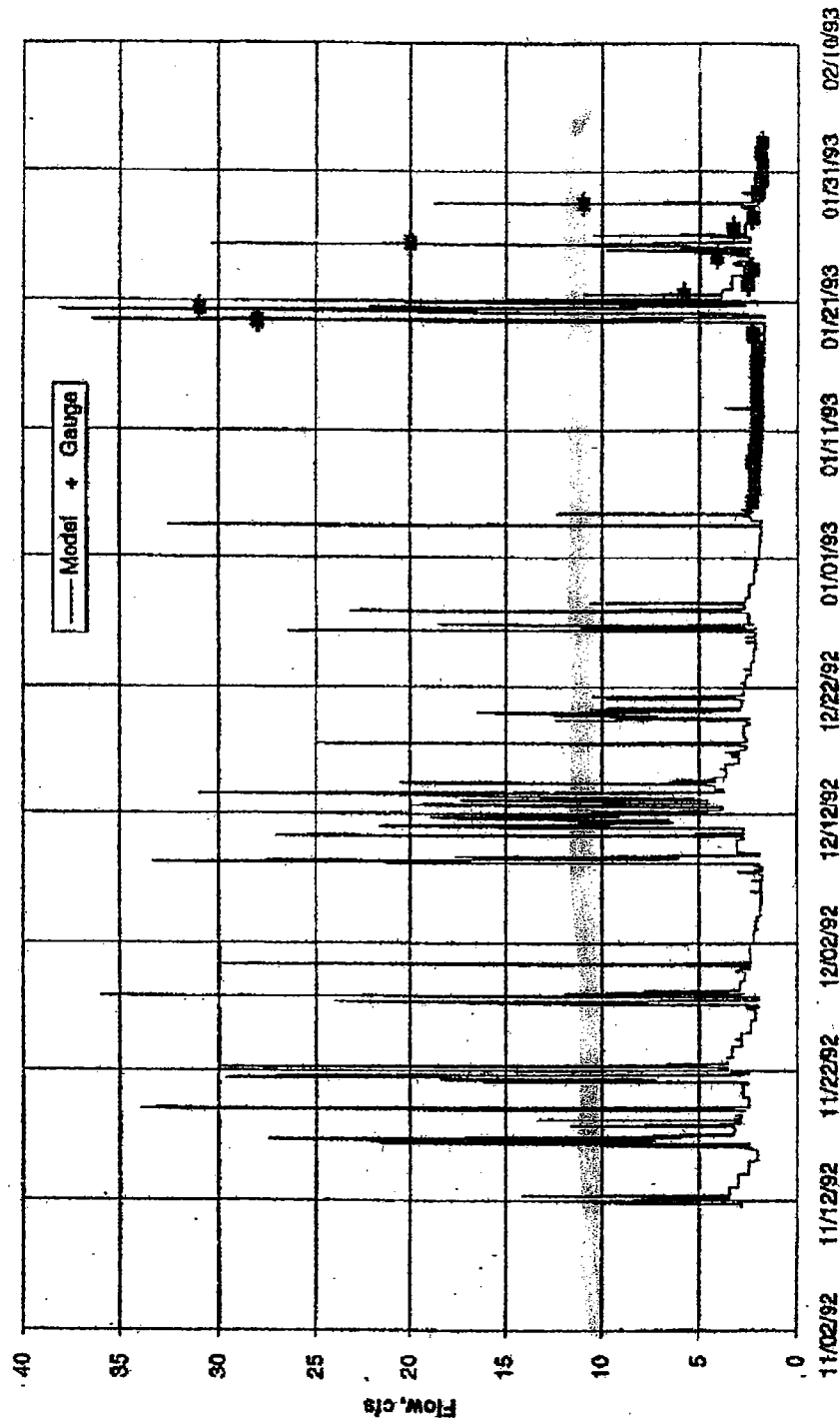


Exhibit-8: Brown & Caldwell: Storm-water-Drainage-Study: March 1993 (Mar./1993)

26 Pans 5/5/93 -> Tides me Low - Evening - Flow - 14.5  
 4 12 - 15 CES.

Hot-Item

80 Days

CP00348

TASK B-1

STORM WATER  
DRAINAGE STUDY  
OF  
BOEING CREEK

FOR THE  
KING COUNTY  
DEPARTMENT of PUBLIC WORKS  
DIVISION of HYDRAULICS

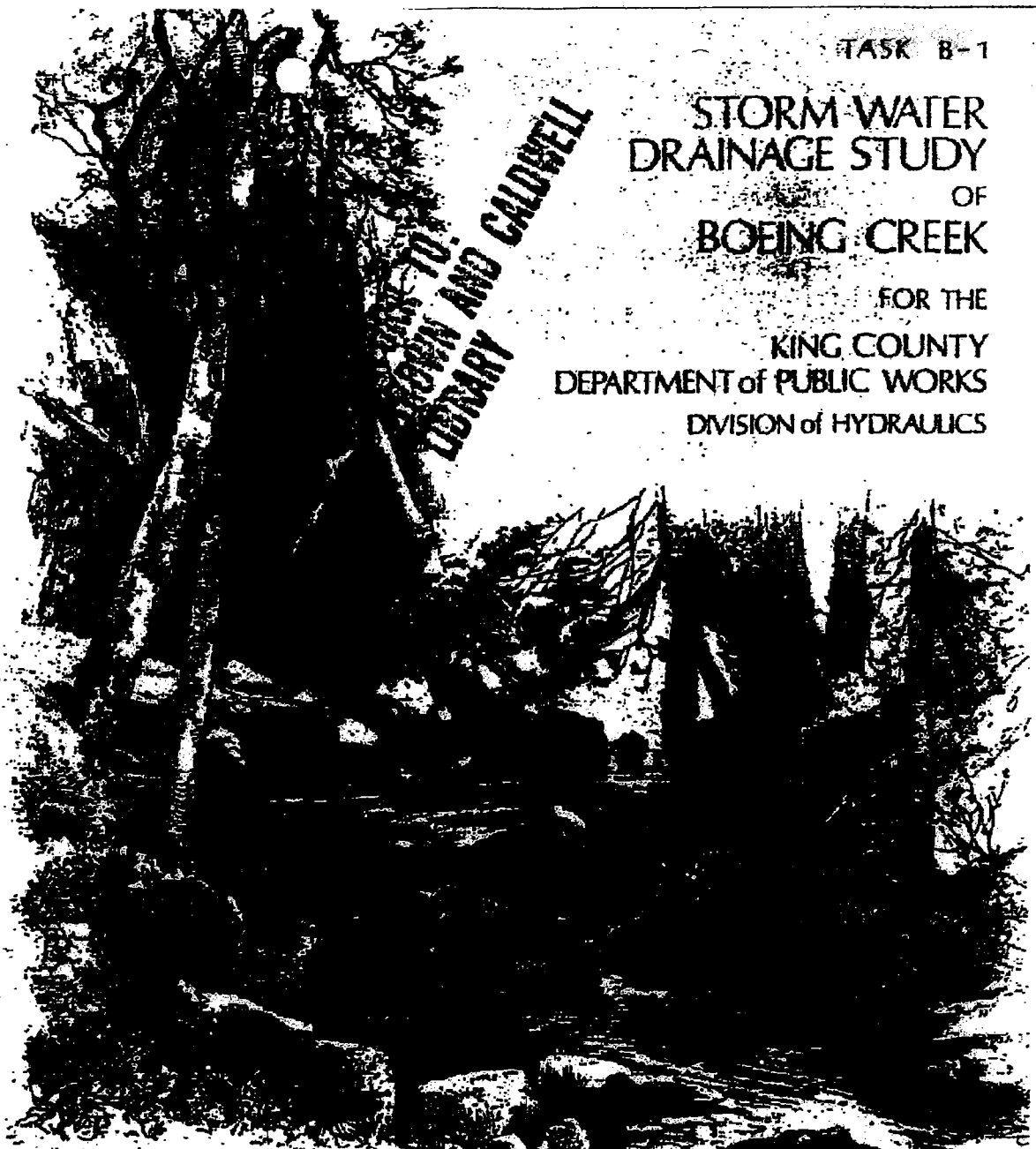


Exhibit 2: Brown & Caldwell - Storm Water Drainage Study of Boeing Creek: Task B-1: April 1980:

APRIL 1980

**BC** BROWN AND CALDWELL  
CONSULTING ENGINEERS

SEA 4/80-T



CP00328

# TASK B-1a--FORMULATION OF CRITERIA FOR CONCEPTUAL ALTERNATIVES

## Purpose

The purpose of Task B-1a is to establish criteria for developing alternatives for the creek system. The goals of this project,

- Alleviation of upstream erosion and concomitant downstream sedimentation of the creek;
- Control of flooding in the creek system; and
- Provision of enhanced fish habitat in the stream,

were in the original statement of the project, and previous tasks have provided the necessary background information to support decisions for alternatives to accomplish those goals.

As the study has progressed, the desirability of addressing certain specific upper basin problems has also been recognized. There is one goal in addressing solutions to those problems: the alleviation of local flooding.

The primary goals of this project are direct solutions to immediate problems; but the solutions can have a long-range effect of either maintaining or removing options for the maintenance of stream habitat and its use in the future as a recreational resource. During the accomplishment of previous tasks and in discussions between the consultant and county staff, several secondary goals have been identified which will ultimately affect the shape of alternatives. It is, therefore, important that the criteria that are established for alternatives take into account both the short- and long-term effects of the actions they support. In some cases it may be desirable to subordinate the immediate solution to the long-term desired effect in order to achieve the best mix of alternatives.

The secondary goals identified are a statement of the long-term intent for beneficial use of this stream resource, and solutions to immediate problems must be balanced with secondary goals. These long-term goals have been identified as:

- Re-establishment of Hidden Lake as a recreational resource;
- Maintenance of the natural character of the stream system to enhance the ecosystem and provide improved recreational opportunities;
- Alleviation of erosion downstream of Hidden Lake.

CP00329

### Development of Criteria

A set of criteria has been established which directly supports the immediate goals of the project, and in a broader sense also supports the long-term goals. There is a set of criteria common to any alternatives which may be established. These are:

1. Cost
2. Simplicity/reliability
3. Liability of the owner
4. Use of public vs. private land for improvements

The first cost of improvements as well as annual maintenance costs are important to the county in establishing the fiscal impact of the proposed program as well as projecting benefits and future costs for maintaining the system.

The system should optimize simplicity and reliability so that costs and impacts of unforeseen events may be minimized. Liabilities of the Owner for impacts resulting from improvements, both in terms of construction and low frequency events which exceed the boundaries of the design conditions, must be carefully evaluated for their relation to cost and legal consequences. Finally, there is a need to evaluate the use of land already in the public domain versus the need to acquire rights to the use of private land for improvements.

The remaining criteria for alternatives support the goals by directly addressing their requirements. A major factor in the consideration of alternative solutions is the choice of a frequency of occurrence of storm for design purposes. The county has defined the design storm for the alternatives to be the 25-year recurrent intensity. Therefore, alternatives supporting the goals shall be designed for coping with the 25-year storm, and this factor will directly affect the physical characteristics of all alternatives.

The following criteria have been established to guide the development of alternatives to support the goals of reduction of flooding, erosion, and sedimentation:

1. Peak flow rates in the creek shall not cause water levels which exceed channel boundaries.
2. Peak flow rates shall not erode channel materials.
3. Peak flow rates (velocities) shall not be high enough to transport sediment.

Criteria to support the enhancement of fish habitat in the stream are:

1. Minimum flow rates equal to dry-weather flow shall be maintained in the active stream.

CP00330

2. Water quality equal to dry-weather flow shall be maintained.
3. Natural channel and streamside conditions, pools, riffles, and shading shall be maintained at present levels or added to.

Criteria to support the secondary goals of re-establishment of Hidden Lake, maintenance of streambed natural character, and alleviation of downstream erosion are:

1. Morphometry of the lake shall be suitable to support recreational uses.
2. Access to the lake shall be compatible with uses and maintenance requirements.
3. Outlet control structures shall allow for stormwater detention in the lake.
4. Lake level and shoreline location shall not endanger or displace private property, nor cause further degradation of surrounding natural habitat.
5. Streambed channels shall be maintained in a natural condition, including retention of natural materials and maintenance of natural meandering alignment.
6. Peak outflow rates from Hidden Lake during the 25-year storm shall be below the critical channel capacity west of Innis Arden Way.

Criteria to support the goal of alleviation of flooding in the upper basin are the same as those which support alleviation of flooding elsewhere, namely, that flow shall not exceed channel (or conduit) capacity, and that private property shall not be endangered.

#### Relationships of Criteria to Accumulated Data

The goals and criteria described have been set forth on their own merit, without being related to the accumulated data. Before developing feasible alternatives, criteria will be compared with the data accumulated thus far to determine if the criteria represent a reasonable approach.

The first goal is reduction of flooding in the stream. For purposes of this system evaluation, flooding is defined as flow levels and rates which exceed channel capacity, creating abnormally high water levels, thereby causing erosion and sedimentation. The

CP00331

natural channel capacity of the stream in the critical section has been identified as 12 cfs (Task A-2, Appendix B). Model studies of flows indicate that peak flow rates at the critical section greatly exceed 12 cfs during the 25-year storm. Flow rate capacities in other reaches of the stream have been determined using the same critical noneroding velocity limit of 3.75 fps. It follows, then, that either the peak flow rate will have to be reduced or the stream channel capacity will have to be increased to meet the criteria.

The last primary goal is to establish an enhanced fish habitat. Minimum channel flow during the summer condition was measured at station 17+00 at 1.0 cfs  $\pm$ . This flow was measured at about the same date as biological and water quality samples were taken. The date of measurement was preceded by several days without rain, and the stream channel was dry above station 32+00. As pointed out in the Task A-1 report, the stream begins as groundwater at station 32+00. Since there is little direct control over minimum flow by virtue of this fact, there is a likelihood that it could, in severe drought conditions, drop below the minimum necessary to support fish. The criteria, therefore, are not directly supportable in the stream without the provision for flow augmentation. It is, however, supportable by establishment of a lake wherein flow would not be so important. A similar situation occurs with the other two criteria which support this goal. Streamside shading can be maintained, but water quality will assume less importance than minimum flow to support a stream habitat.

Review of the data accumulated indicates that the first secondary goal of establishment of Hidden Lake can be met within the criteria established. The support of this goal appears to be constrained more by cost of construction than any other factor. All the physical characteristics appear to be present to make achievement of this goal possible. The support of criteria for alleviating erosion downstream of Hidden Lake is affected by the alternatives possible in the upper streambed.

Criteria for maintenance of the natural character of the streambed through minimization of the alteration of alignment and vegetation, minimizing grounds maintenance requirements, and the maintenance of minimum water quality can be meshed with criteria supporting other goals. The primary objective in supporting these secondary goals is to keep their importance in the foreground during development of alternatives to support primary goals.

In order to synopsise and correlate the criteria presented here, the following table illustrates the applicability of each criterion to each goal. Cost is the most broadly applicable criterion, with liability and public land use having the second largest impact on goals. The goal requiring the satisfaction of the most criteria is enhancement of fish habitat, implying that this may be the most difficult to achieve.

CP002332

Two methods of accomplishment for this alternative are illustrated in Figure B1-6. A system of 48- and 60-inch pipe would be constructed beginning at Greenwood Avenue North and continuing west to ~~discharge to either Boeing Creek just west of Innis Arden Way or directly to Puget Sound.~~ Construction in the creek ravine is not feasible due to soil and topographic conditions as well as the desire to maintain the natural character of the system.

Impacts. Peak flow requirements for the 25-year storm are 280 cfs. Required pipe sizes are 48- and 60-inch. Peak flows from storm intensities greater than the 25-year event would enter the creek through overflow structures at each point of diversion. Storm flows from a 25-year frequency event that would enter the stream as non-point sources would add a peak flow of 17 cfs to the flow at Hidden Lake. [Hot-Item]

Construction impact on county rights-of-way would be major along the route indicated. Maximum excavation would be 15 feet, requiring a trench some 12 to 16 feet wide. Outfall to Puget Sound could enter the creek just east of the Burlington Northern Railway. Approximately 2,600 feet of pipe would cross private land. ~~Discharge to Boeing Creek west of Innis Arden Way would cause severe impact on the stream, whose noneroding channel flow limit is estimated to be 12 to 15 cfs.~~ [Hot-Item]

Advantages. The concept is simple and reliable. All flow is by gravity. Recurring maintenance to the system would be for the most part limited to debris removal from entrance and overflow structures. In-channel improvements would be limited to protection necessary to accommodate the anticipated overflows from events of intensities greater than the 25-year storm. Overall water quality in the creek system would be improved by the diversion of approximately the yearly storm total quantities of materials shown in Table 7, Task A-2 report, or approximately 41,000 pounds of suspended solids and 17,000 pounds of oils and grease. Erosion and sedimentation in the stream would be essentially eliminated, except for overflow conditions. Land use in the creek system would be negligible, with essentially all structures in county rights-of-way.

Disadvantages. Impact on Boeing Creek could be major depending upon the point of discharge. Construction, property, and legal impacts may be severe and costly to ameliorate. This solution does not deal with the long-range problem, but only transfers it to another location. All flows in the stream would be dependent on groundwater and local non-point runoff. Cost is a major impact. Estimated cost of the alternative is 3.5 to 4.0 million dollars.

## 2. Alternative 2: In-stream Flow Equalization

The second concept also deals with potentially destructive peak flow rates in the stream by dampening the flow peak and variation. This alternative creates storage points in the flow path which receive widely varying flow rates and volumes and translate

CP00334



# Shoreline Fire Department

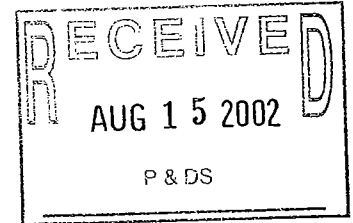
*Dedicated to the Protection of Life and Property*

Scott Keeny  
Jon Kennison  
Katherine S. Williamson  
Commissioners

J.B. Smith  
Fire Chief

August 14, 2002

**Log # 40**



Kirk McKinley  
Planning Manager  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, Washington 98133-4921

Re: Aurora Corridor EA & Draft EIS - Comments

Kirk,

First, I'd like to thank the City for including us in your process of evaluating alternatives for the Aurora corridor project. In a meeting during October of 2001 we outlined our concerns that included:

- Frequency of spacing and east / west alternation of fire hydrants
- Number of turnouts and / or left turn median cuts to assist with emergency vehicle access and response
- Potential of paving the tips of the medians to enhance our ability to u-turn apparatus
- Uniform street lighting & reduction of number of access points along Aurora

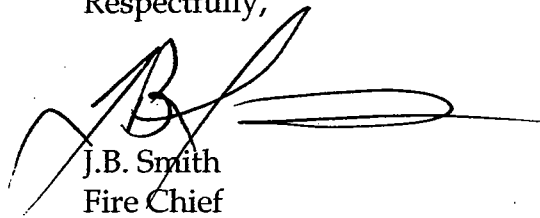
All items above, with the exception of the fire hydrant spacing issue, have been addressed satisfactorily with either Alternative A or B. The improvements outlined for Aurora will improve the safety condition of this major arterial and not hamper our response capabilities in any significant manner.

40-1 We do ask that consideration continue to be given to including improved fire hydrant spacing on both the west and east sides of Aurora in any further planning. This would enhance fire protection for all businesses along the corridor by making it less likely that the fire department would have to lay large diameter hose lines across Aurora during emergencies. It would also result in less traffic disruption should this eventuality occur.



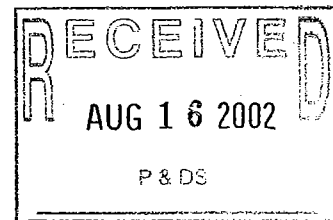
Thank you again for taking the time to personally brief us on the status of these projects and for being so receptive to our input.

Respectfully,



J.B. Smith  
Fire Chief

Cc:  
Board of Commissioners  
Deputy Chief Mehlert



*Richard E. Sola*  
2315 NW 197<sup>th</sup> St  
Shoreline, WA 98177

August 13, 2002

Aurora Corridor Responsible SEPA Official  
City of Shoreline  
17544 Midvale Ave N  
Shoreline, WA 98133-4921

Dear Responsible SEPA Official:

The Community of Shoreline decided in August of 1999 what we wanted the Aurora Corridor to become. This decision was the result of an extensive, open, public, legitimate process in which everyone had an equal opportunity in which to express their views and concerns. The views of the Aurora businesses were heard loud and clear and were clearly understood. Some of their suggestions were accepted and became a part of the consensus. Some of their suggestions we rejected because they were not compatible with the goals, objectives and logistics of the Corridor. This is the way decisions are supposed to be made in our democratic society.

The resultant consensus, called the Aurora Concept, was adopted unanimously by the City Council in August of 1999. The following is a brief review of the major elements that the community requested for the Aurora Improvement Project:

- 1) The Community requested that the corridor become significantly safer for car and pedestrian traffic. We want to take advantage of current traffic and access management techniques that have been proven successful. Other cities and states, with roads similar to Aurora, have found that their roads with raised medians have 45% lower vehicle accident rates, 43% lower injury rates, and 78% lower pedestrian fatality rates than those roads with two-way left turn lanes. It is reasonable to expect that we could achieve a similar reduction by converting from two way left turns to raised medians. It is estimated that our accidents on Aurora cause societal costs of approximately \$10,000,000 per year. If we were to reduce our accidents by 40% we would reduce our societal costs by \$4,000,000 per year.
- 2) The Community requested that the Aurora Corridor be attractive so as to enhance the quality of life and attract consumers to Shoreline rather than drive them away.
- 3) The Community requested that the Aurora Corridor have an infrastructure and

business environment that permits and encourages our current businesses to prosper and grow, and one that encourages new business investments. We want the Aurora Corridor to achieve its full economic potential, which is essential for our city's financial well being.

The opponents claim the raised medians would be disastrous for their businesses. Their position is not supported by the facts. The state of Texas found through an extensive study that converting from two-way left turn lanes to raised medians economically benefits the adjacent businesses. Their sales increased, their customers per day increased, and their property values increased. Based on these facts, we believe that our Aurora business community will also benefit from the Aurora re-configuration as stipulated in the Aurora Concept. We view this as very pro business.

4) The Community requested that Aurora become pedestrian and transit friendly. To achieve this, it is the consensus of the community, that a four-foot amenity zone and eight-foot sidewalks are required. We, by no means, consider this extravagant.

5) The Community requested that we take advantage of this once-in-a-lifetime opportunity to have the Aurora Corridor become a great asset for the City of Shoreline, instead of a detriment. This is an investment that will benefit us in the near term, as well as for future generations to come.

It is common knowledge that Dan Mann and the Aurora Merchants Association have refused to honor our democratic process for Community & Citizen input. For three years they have waged an aggressive campaign to diminish, derail and delay, in any way they can, the Aurora Improvement Project as adopted. Just in the last few weeks Mr. Mann again threatened further litigation if the City does not comply with their demands. The City Council during this three-year period of time has consistently rejected their demands that would decimate the Aurora Concept. I commend you for doing so, encourage you to continue to stand strong and give you my complete support in your continued efforts to honor and implement our community's vision for the Aurora Corridor.

41-1 | I am in full support of Aurora Corridor DEIS Alternate A and urge the City Council to adopt this for final project approval and implementation.

Thank you for your consideration.

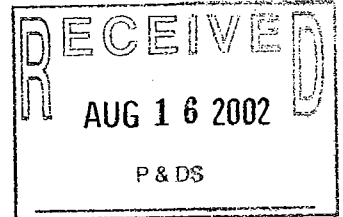
Sincerely,



Rick Sola

8/14/02

Aurora Corridor Responsible SEPA Official  
City of Shoreline  
17544 Midvale Ave. No.  
Shoreline, WA 98133-4921



Dear "Responsible SEPA Official":

I would like to make few general points regarding the Aurora Corridor Improvement Project.

1. Aurora Ave North for better or worse is the "Main Street" for the City of Shoreline. It is the center of our town. Aurora is not just a commercial area surrounded by residents indifferent or passively tolerating its existence. Rather Aurora is a thoroughfare, for which many local residents share a personal sense of community identity and a direct interest in how it will be developed.
2. Our "Main Street" could be a pleasant and beautiful place. A place for residents to spend time, to relax, to enjoy and appreciate. It could be more than just a roadway connecting Seattle with Edmonds or Lynnwood. It could be a place that enhanced the quality of community life for both residents and businesses alike.
3. If we could create a quality "Main Street" residents would be drawn to spend time and money there.
4. And more..... If Aurora was a pleasing destination, consumers from the surrounding area would find their way there. And conversely if this roadway was not beautiful or pleasant then consumers will just drive on through.
5. Once completed a quality "Main Street" would attract other businesses that will want to invest in our community. This, it would seem, is the common goal for both Shoreline residents and Shoreline business owners alike.

42-1 | I believe that Alternative A creates a better foundation for this "Main Street" than any other Plan.

I support Alternative A for the Aurora Improvement Project.

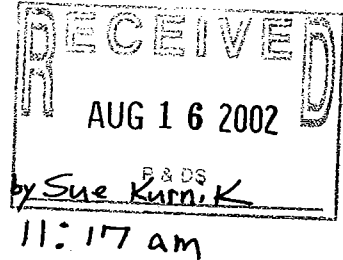
Sincerely,

Ron Greeley  
20233 - 23rd Ave NW  
Shoreline, WA 98177-2364  
206-546-8186  
Fax: 206-533-0153  
Email: [ragreeley@mindspring.com](mailto:ragreeley@mindspring.com)

A large, stylized handwritten signature in black ink, which appears to read "Ron Greeley".

## Log # 43

Timothy Stewart, ACIP  
City of Shoreline  
17544 Midvale Ave N  
Shoreline, WA. 98133-4921



August 15, 2002

RE: City of Shoreline AURORA CORRIDOR "Transportation Solutions for Shoreline's Main Street" Storm water comments on the EA/Draft EIS

Dear Tim;

It is impossible to do an intelligent analysis on this EIS document because the specifics and technical data have been omitted.

This EIS document blatantly and unreasonably tries to play down the environmental, economic and social impacts of this proposal.

43-1 | This EIS spends little, and inadequate space or time addressing the economic and social impacts of this proposal.

43-2 | This EIS does not recognize that "oil-water separators" are only partially effective in removing petroleum hydrocarbons from the water contained in the catch basins. And, "oil-water separators" don't work at all if regular maintenance is not preformed. There is no discussion of maintenance schedules in this EIS. Maintenance should occur after every storm event and on a regular monthly schedule throughout the year.

43-3 | Treatment of the stormwater runoff by any other method than Flocculation, an electrical process that makes the polluted molecules attract each other thus forming particulate matter large enough to then drop out of the water because of gravity, is the only sure method to completely treat stormwater runoff. The "Vortex/gravity and vault filtering systems" will not remove anything in solution in the storm water such as anti-freeze, pesticides and nutrients.

43-4 | This EIS does not address and in fact totally ignores the holistic ecology of impacts from this proposed project on the larger community of Shoreline. It ignores the cumulative effect of all development in Shoreline further reducing impervious surfaces.

43-5 | Using bio-swales to filter out pollutants from stormwater runoff will only filter part of the pollutants and then only absorb them into the plants themselves. The plant life does not change or modify these pollutants and must be periodically harvested, dried and burned. The ashes need to be disposed of as hazardous waste. This process will cause more maintenance costing many dollars over time if it is to prove effective.

43-6 | The BAT lanes will not noticeably improve bus movement through Shoreline, as the buses now running through the city are not impeded in any way by competing traffic.

43-7 | Using underground vaults to capture stormwater will only be partially effective. If a second storm event occurs shortly after the first storm event or a long-term storm event occurs, these vaults will fill then be useless for the second or continuing storm events. Sizes and capacities of these vaults are not included in this document or the "discipline" document.

There are no descriptions, specifics or technical details in this document regarding the "Spill Control Plan."

43-8 There is no definition and limited discussion of "Treatment Facilities" in this document.

There are no specifics or data provided discussing what the Best Management Practices (BMP's) will be and how they will address erosion/sedimentation controls or will mitigate these problems.

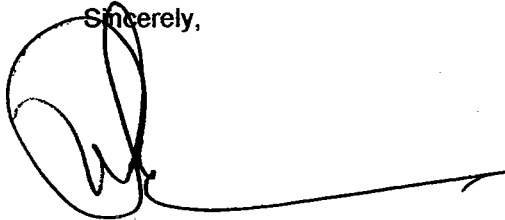
No information has been provided as to the capacities of the current stormwater system or the capacities necessary to carry off the stormwater runoff of Aurora and other impervious surfaces the storm water sewer serves.

43-9

There is no technical information provided addressing the necessary capacities necessary for the retention/detention ponds, location, size and how the city will prevent thermal pollution of raising the temperature of the water as it sits in these R/D ponds soaking up the sun. Will they be open, underground or covered?

I respectfully reserve the right to submit further comments on this EIS.

Sincerely,

A handwritten signature in black ink, appearing to be 'W. G. Monroe', with a long horizontal line extending to the right.

W. G. Monroe  
19240-10th Ave NE  
Shoreline, WA 98155  
364-1657

August 13, 2002

Aurora Corridor Responsible SEPA Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133-4921

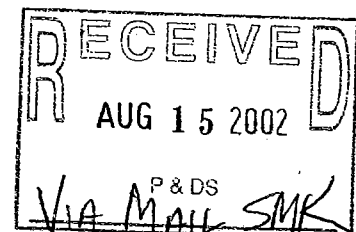
Dear Aurora Corridor SEPA Official:

44-1 I am writing to you in support of Alternative A. I understand that a committee representing business interests and community interests was appointed in 1999 by the Shoreline City Council to consider what the Aurora Corridor should look like. I further understand that the meetings were open to the public and that a number of community open houses were provided which gave an opportunity for people to make suggestions in writing and to talk to members of the committee as well as consultants to the City of Shoreline and Shoreline staff. Now, a group of business people, many of whom do not own the property where their businesses are located want to control how the Aurora corridor looks. Many of these people have parking in the existing right of way and in order to prevent them from losing this parking, they want the corridor to be reduced so that all of the right of way will not need to be used. Others are on leased land belonging to the City of Seattle. They want to delay this project because they have 30 day leases with rents that are a fraction of what others pay along the corridor. It seems that those who support Alternative B have their own interests at heart. Those who support Alternative A believe in making the corridor safer and an attractive addition to the community. I support Alternative A. I hope you will, too.

Sincerely,

*Kathy O'Neil*

Kathy O'Neil  
18405 Aurora Ave N., Suite H, Box 120  
Shoreline, WA 98133



August 15, 2002

Aurora Corridor Responsible SEPA Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133

Dear Aurora Corridor SEPA Official:

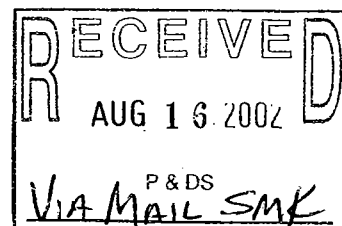
My wife and I have a business located near the Aurora Corridor and we use the Aurora Corridor quite often getting supplies and taking our family from place to place. I understand that you are requesting input from the community in order to learn which alternative they support.

45-1 We support Alternative A. We believe Alternative A provides greater safety to people walking along Aurora and for people riding in vehicles. We can't wait to see landscaping along this highway with low lying bushes, evergreen shrubs, and some trees. We look forward to seeing the overhead wiring placed underground. Aurora is our city's main business district. It must be appealing to the public so that they will shop here. We are also anxious to see the Interurban Trail completed. The improvements to Aurora and the construction of the Interurban Trail will make Shoreline a better place to raise a family.

Sincerely,



Randy & Sue Hoverson  
738 N. 200<sup>th</sup> Street  
Shoreline, WA 98177





August 13, 2002

Aurora Corridor Responsible SEPA Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133-4921

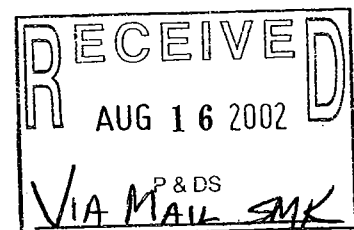
Dear Aurora Corridor Responsible SEPA Official:

46-1 | I am writing this letter in support of Alternative A. I understand that a number of business people have badgered into forming a couple of different groups to oppose this Alternative A. I think this is a big mistake. I understand that Alternative A was approved by the Shoreline City Council after countless meetings involving the public. At these meetings opportunities were given for input and many suggestions were used by the Pre-Design Aurora Corridor team in coming up with a recommendation which came to be known as the Alternative A that is presented in the Environmental Impact Statement. I believe the majority of the community and many silent business leaders are in favor of Alternative A. Their primary reason for approving this alternative is that it provides the greatest safety to motorists and pedestrians. Some of the people will also support Alternative A because it goes a long way in making our community look better. This should help business prosper in Shoreline. I am looking forward to the Aurora Corridor improvement being completed. I look forward to being able to walk safely down Aurora Avenue.

Sincerely,

Lori Hozjan  
17844 8<sup>th</sup> Avenue N.W.  
Shoreline, Wa 98177

*Lori Hozjan*



August 15, 2002

Aurora Corridor Responsible SEPA Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133-4921

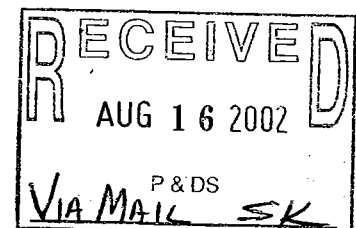
Dear Aurora Corridor SEPA Official:

47-1 I have lived in Shoreline since October 1959 and for many years I have had to rely on the bus for getting around the city. I am looking forward to seeing a lane reserved for buses on Aurora as it will speed up travel for buses and for cars. I am also looking forward to seeing sidewalks along this busy street. It is sad to see people getting off of the bus and stepping into mud puddles and walking behind cars parked at businesses. This is very dangerous. I think that Alternative A is the best proposal for this highway. I think the four foot planting strip is necessary between the highway and the concrete sidewalk where pedestrians are walking. Thank you for your consideration of my comments.

Sincerely,



Ruth Johnson  
1404 NW Richmond Beach Road #28  
Shoreline, WA 98177



August 15, 2002

Aurora Corridor Responsible SEPA Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133-4921

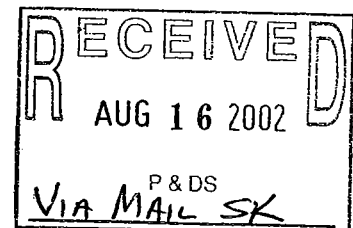
Dear Aurora Corridor SEPA Official:

48-1 I am looking forward to the improvements to be made on Aurora Avenue. I think the current appearance of Highway 99 as it runs through Shoreline promotes prostitutes because the roadway's appearance is so bad. I believe that once sidewalks are installed along with pedestrian lighting, street walkers will not come to this area. I think planting along Aurora will also enhance the appearance of the corridor. I moved to Shoreline because of the schools, but I have been disappointed with the time it takes to get projects like the Interurban Trail and this highway project done. Let's get on with it. I think Alternative A does a great job for all of us.

Sincerely,

Traci Gradwohl  
1408 NW Richmond Beach Road #26  
Shoreline, WA 98177

Traci Gradwohl



August 15, 2002

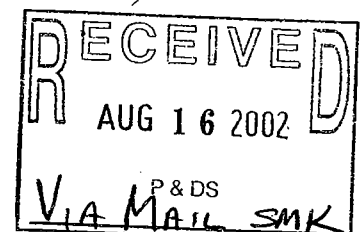
**Aurora Corridor Responsible SEPA Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133**

**Dear Aurora Corridor SEPA Official:**

I live in the Richmond Beach area of Shoreline and am really happy with the area in which I live. The only disappointment I really have with Shoreline is their main corridor, Aurora Avenue. This street has been neglected for so long. The businesses along this stretch of highway have not put money into their properties probably for the same reason. They will not spend any money until someone improves the way the street in front of their businesses looks. I can't wait to see plantings along this roadway. I would hope that green grass would run along Aurora like you see in front of Hollywood Video. And, the median could have evergreen plants. Our city is special and we should make it stand out so that others who drive here know how we feel about the place we call home. Alternative A provides the best alternative for this highway.

Sincerely,

*Julie Williams*  
**Julie Williams  
2445 NW 197<sup>th</sup> Street  
Shoreline, WA 98177**



**Tim Stewart - DEIS comments****Log # 50**

---

**From:** Brian Doennebrink <abcs@cmc.net>  
**To:** Tim Stewart <tstewart@ci.shoreline.wa.us>  
**Date:** 8/16/2002 3:39 PM  
**Subject:** DEIS comments  
**CC:** Kirk McKinley <kmckinle@ci.shoreline.wa.us>

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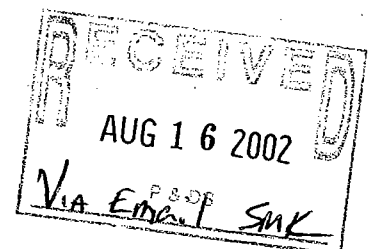
Hi, Tim and Kirk--

I'm done writing up my DEIS comments and have attached them. I highlighted some of the words in blue to help me find the subject matter again so that it would be less repetitive...perhaps it will be to you (if not, and/or for final publishing, it can be returned to black). Please feel free to call me with any questions, etc. Have a nice weekend!

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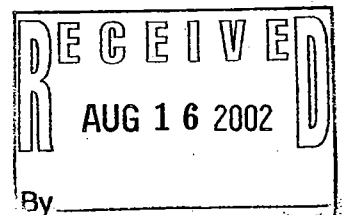
Sincerely,

Brian F. Doennebrink  
(206) 546-8467



Here are my comments regarding the Environmental Assessment and Draft Environmental Impact Statement with an issue date of July 10, 2002; page numbers are in parentheses where applicable). Please respond as appropriate either as part of the Final EIS and/or to myself. These are listed in no particular order. I read through the document fairly quickly, so if I missed something that's in the document, then there's no need to respond to that question.

- 50-1 | 1. The two alternatives both have medians as part of the proposal. If appropriate, could there be a mention as to why they are included (e.g., WSDOT has required that the plan have medians, that the spacing for openings has been okayed by WSDOT; speak to the process involved)? It would probably not be necessary to provide information on studies that support the safety aspect of medians unless WSDOT hadn't required them. I didn't see where a map was provided showing where the breaks in the median would be; also, how long would the turn channels be, how would that be an improvement over the present TWLTL (are they all at signalized locations), and how was it decided where to have openings at these particular locations (in a general sense, e.g., through discussions with business owners,...)? Include medians also being there for pedestrian refuge as well as for benefits from stormwater.
- 50-2 | 2. (xviii) I'm wondering when the two Pedestrian Safety Demonstration projects are ever going to be operational?
- 50-3 | 3. (xx, 3-44) I shuddered at the suggestion/mere mention that bicyclists use the BAT lanes, which would be an extreme hazard to them and to buses. I would suggest wording that they use nearby arterials instead of Aurora and no mention of using the BAT lane or even the sidewalk...especially the former.
- 50-4 | 4. (xxiii) What is FONSI an acronym for? Perhaps there should be a table of acronyms somewhere in the front of this document.
- 50-5 | 5. (1-3) Under capacity, it states that volume is only expected to increase "1.25 to 1.75 percent annually." Later in the document, it's 2-5% as I recall. I am familiar with the latter amount, but hadn't heard the former. Perhaps a projected traffic count should be included, also showing some regional comparisons, e.g. I-5 at 175<sup>th</sup>, 15<sup>th</sup> NE at 175<sup>th</sup>, etc.
- 50-6 | 6. (1-4) What is "intersection geometry"?
- 50-7 | 7. (1-6) I believe that the correct way to put quotes within quotes is to use single quotes for the interior set of quotes, in this case, 'sense of place.'
- 50-8 | 8. (2-5) What is the status on giving transit signaling priority (TSP)? If signals are timed, I'd suggest that signs be posted such as "signals are timed at 38 m.p.h." vs. "signal timing in effect" as was done in Seattle's portion of Aurora; the latter tells the motorist nothing. Also, I'd suggest retaining the 40 m.p.h. speed limit. Also, mention that bus travel time decreases "by approximately 10 percent" with new signal timing (from Metro's brochure on the Lake City Multi-modal project).
- 50-9 | 9. (2-14) Has the right-of-way acquisition process already started?
- 50-10 |
- 50-11 |



Brian Doennebrink-Aurora Avenue North, Phase I-DEIS comments  
8/16/02

- 50-12 | 10.(3-3) What is SYNCHRO, EMME/2, and VISSIM? Perhaps these could be briefly described in the table of acronyms.
- 50-12A | 11.(3-8) Pedestrian and bicycle activity is sparse mostly due to a high danger to one's personal safety...I'd be more blunt. Also, some motorists avoid Aurora and Aurora businesses due to the safety and congestion issues and at particular times of day.
- 50-13 | 12.(3-10, 3-16, 3-37) I couldn't tell whether Westminster Way is going to continue to be operational vs. closed off.
- 50-14 | 13.(3-12) How do the LOS at 160<sup>th</sup> and 165<sup>th</sup> improve so dramatically? I do have some concern about increased traffic using 165<sup>th</sup> vs. 160<sup>th</sup> after a signal is installed at the former, but I think that it will mostly be from northbound traffic. As a former Shoreline CC student commuting there from the north, I was already avoiding Aurora and using Fremont instead of Aurora and 160<sup>th</sup>.
- 50-15 | 14.(3-15) Somewhere in this document, it stated about the 8 foot wide sidewalks being in the city's ordinances. Perhaps it could be reiterated in other places, such as in paragraph 2 on this page. Should the ADA minimum (5 1/2 feet) be mentioned?
- 50-16 | 15.(3-15, 3-44) Is 4 feet the minimum needed for an amenity zone, or is there something less?
- 50-17 | 16.(3-16) Is there going to be any communication effort going to be made to inform owners and delivery people of the routing changes?
- 50-18 | 17.(3-19) Are all unsignalized intersections considered "minor approaches"? Perhaps this could be mentioned in the acronym/definition section.
- 50-19 | 18.(3-19) Why does the delay at North 145<sup>th</sup> worsen?
- 50-20 | 19.(3-20, 3-32) It should be mentioned-if still applicable-that Aurora Avenue North is under consideration for Metro's Bus Rapid Transit program, one of 3 finalists as I recall. Also, the corridor may become more attractive to Community Transit and Sound Transit.
- 20.(3-36) Looks like the sentence ends prematurely at the bottom of the page, a peculiarity of Microsoft Word documents of more than 20 pages!
- 50-21 | 21.(3-43) As I recall, the median landscaping would be something similar to what's at 175<sup>th</sup> under and near I-5?
- 50-22 | 22.(3-43 as well as Daniel G. Mann's handout) I was under the impression that the undergrounding was at no cost to the property owner...
- 50-23 | 23.(3-44) Why doesn't Alternative B contain any lighting improvements-is it because of the space needed for the poles or ?
- 24.(3-46) The bus also serves low-income populations and for some represents the only or at least a major form of transportation. If buses can meet their schedules, more buses can run to better meet their needs.

Brian Doennebrink-Aurora Avenue North, Phase I-DEIS comments  
8/16/02

- 50-24 | 25. I wondered if there was any possibility of the city purchasing any or part of the vacant lots for the purpose of establishing public parking at locations where businesses may be losing some of their parking in front of their buildings? This probably is more applicable to the middle section of Aurora.
- 50-24A | 26. (3-51) Employment: I was curious as to how many staff the city has; also, what the larger employers have?
- 50-25 | 27. (3-51 through 3-55) I was curious as to the sales tax numbers-by block or whatever the lowest breakout could be-for Aurora, then compare this to the total city and other forms of taxation. This was somewhat done on the subsequent pages, but I'd like to see a finer level of detail if possible. Also, was Aurora Village included in the Aurora sales tax figures? I'd suggest including a % line with the tables on 3-53. Also, maybe 1 or 2 examples of each industry. See the last page of my comments for some ideas.
28. (3-56) The second sentence seems to infer that the increased traffic volumes would "open up the existing businesses..." The wording of the first part of this sentence threw me off a bit.
- 50-26 | 29. (3-56, 3-57) Is there a dollar estimate for the loss of property tax revenues? A positive for merchants would be that their being closer to the highway would potentially improve the visibility of their businesses.
- 50-27 | 30. (3-57) I was surprised at how much Pizza Hut would be affected and didn't understand why. Will Westminster be a single lane from Aurora?
- 50-28 | 31. (3-63) I'd like more detail on which businesses in the other segments. Also, is it possible to have one alternative/plan for this segment and something different for one or both of the other two?
- 50-28A | 32. (3-63) The concern with increased property taxes means that the owners have to have the ability to pay those increases, and some won't be able to.
- 50-28B | 33. (3-64) I heard some concern about property owners getting compensated, but not the property's business operators.
- 50-28C | 34. (3-70) Pollution: I was surprised at how the "no action alternative" would do relative to the other two given the increased LOS and longer lines of cars idling in the TWLTL from the former.
35. Many motorists utilizing Aurora are used to being diverted from the recent and ongoing construction of a similar project on the Lynnwood/Edmonds segment of the road.
- 50-29 | 36. (3-95, 3-96) The numbers under the "Existing Impervious Area" differ in tables 3-36 and 3-37. Perhaps "impervious area" should be defined, too. Where does the 29,500 number come from in table 3-37? I would expect this to be lower than the comparable number in table 3-36.
- 50-30 | 37. (3-97) More information on what impact on the aquatic habitat in Boeing Creek there might be.



- 50-31 | 38. (3-134, 3-140) Financing. There seems to be some misunderstanding in the community about the limitations of a grant. I've heard it been said that instead of spending money on Aurora we should spend it on "x." Perhaps some mention could be made of the limitations of grants in terms of spending on what? Also, the financing of the project (sources and uses) and where potential cost savings are. For instance, Alternative B costs less than Alternative A, but which entity gets the cost savings? Does the city invest less in B or ? Perhaps a table would be useful.
- 50-32 | 39. (3-135, 3-139) I noticed that there's been some different choices in landscaping from Walgreen's north along the east side of Aurora to about Goldie's. Perhaps this would be beneficial, although on the other hand I could see where having the trees that change different colors could be a huge draw for the city and more of a positive. How far would the trees be apart from each other?
- 50-33 | 40. (3-152) I was wondering if some of the existing small businesses could be clustered into a mini-mall? I am aware of the city's limitations in facilitating such a move, but I could picture some of the city's specialty places clustered together with a nearby public parking lot. This may be somewhat futuristic, but worth mentioning.
- 50-34 | 41. (3-154) Also have plenty of signage that "businesses are open during construction."
- 50-35 | 42. As is human nature, there is a lot of fear of the unknown, of change. Perhaps some data on the positive results that similar improvements have created elsewhere?
- 50-36 | 43. (B-1) Replace "HOV" with "BAT." Also, the latter should be in the acronym/definition section, with a phrase something to the effect "as opposed to an HOV lane, which..."
- 50-37 | 44. Was it mentioned anywhere about the possibilities of changing the road alignment, a variance in sidewalk widths, and parking behind the building (and the benefit of the latter to businesses)?
- 50-38 | 45. How about a "before" and "after" table, comparing number of vehicles and characteristics (access points, lighting, through lanes, sidewalks, synchronized traffic lights, aesthetics, pedestrian safety-refuge, etc.). I thought that the traffic conflicts diagram from CATF was particularly helpful (where it showed potential conflicts with the various turning movements).
- 50-39 | 46. With BAT lanes, perhaps a discussion of why BAT vs. HOV vs. carpool where the benefits of BAT were mentioned (e.g., one buss full of passengers is the equivalent of 42 cars). Also, a map or at least mention that the BAT lanes would be an extension of those in the Seattle segment from 105<sup>th</sup>-145<sup>th</sup> (and, in addition, they are planning on extending theirs southward).
- 50-40 | 47. I agree with Ken Meyer's idea of having the EIS more available: on-demand CD and perhaps the website as a PDF document.
- 50-41 | 48. It should be mentioned that the CATF members went door-to-door to inform them about our meetings and the plan. We also had tables set up in various places.

Brian Doennebrink-Aurora Avenue North, Phase I-DEIS comments  
8/16/02

Sales taxes

Aurora Avenue North

145<sup>th</sup>-155<sup>th</sup>                      <=or in groups of 5 blocks if possible (phase I only)

155<sup>th</sup>-165<sup>th</sup>                      •

Phase I total

165<sup>th</sup>-185<sup>th</sup>

185<sup>th</sup>-205<sup>th</sup>

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Total Aurora Avenue N.

North City

Ballinger Way NE

Rest of Shoreline

Total Sales Taxes

Total Property Taxes

Total Gambling Taxes

Total Utility Taxes

Etc.

(and footnote what each area is comprised of)

A property tax table similar, with the additional subtotal for "all commercial" and a total line for "All Residential" and a grand total that combines those two. Then, the total lines (no detail) for sales, gambling, utility, and other taxes.

**Tim Stewart - Comments - Aurora Ave N Multimodal Corridor Project N 145th-165th EIS**

**From:** "Jeff Crisafulli" <jcmod\_rainier@hotmail.com>  
**To:** <tstewart@ci.shoreline.wa.us>  
**Date:** 8/16/2002 3:51 PM  
**Subject:** Comments - Aurora Ave N Multimodal Corridor Project N 145th-165th EIS

**Log # 51**

I have heard that businesses in the corridor are concerned about reduced access and losing storefront visibility. The EIS I think disproves this concern, as does my experience with corridors that have similar construction. I had thought that the biggest drawback of this plan to improve Aurora Avenue would be loss of parking, but the EIS states that the loss of parking would be minimal and mostly subject to relatively simple mitigation.

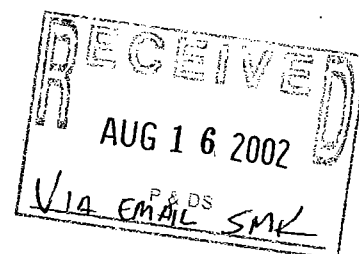
When thinking about the options for improving Aurora Avenue, I compared it to Lake City Way, north and South of 125th. That stretch of Lake City Way is the only walkable, enjoyable stretch of that road, and were it not for the nice median and relatively safe driving and pedestrian conditions, I probably would not as regularly frequent some of the businesses down there, including the VTMC video store, Fletcher's Second Hand, Romio's Pizza, Toyoda Sushi, and the soccer shop. The entire length of Lake City Way, except for this segment, is an eyesore, much like Aurora Avenue. My only problem with this segment of Lake City Way is the lack of a left-hand turn from Lake City Way northbound onto 125th westbound, a problem which it seems would not be an issue with the left-hand turn lanes included as part of the Aurora Avenue plan.

51-1 I really like the landscaped center median on Lake City Way and think it would be nice to add some trees to the proposed median on Aurora. Similarly,  
 51-2 I prefer the landscaped, wider sidewalk alternative with an amenity buffer (Alternative A). The idea that an amenity buffer or trees in the median would remove visibility to business is false, based upon what I know about the visibility on the segment of Lake City Way I've described above.

51-3 I saw mentioned in the EIS that some people have proposed that tunnels or bridges be installed to make crossing the street easier and safer for pedestrians. This is completely unnecessary and would hurt the not only the better look this improvement would bring to the corridor but also the businesses. I have no trouble crossing Lake City Way (at the segment noted above). The tunnels and skybridges I've seen in the Seattle area are eyesores and little used, and the skybridges certainly cut down on visibility. A tunnel or overpass is a very bad idea, and a waste of money. (The tunnel on Aurora Avenue at 80th has been closed for years.)

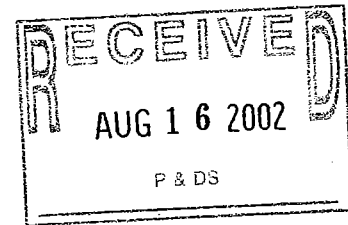
I live in eastern Shoreline and would prefer to shop at businesses in Shoreline when possible. However, in all of Shoreline, until you get pretty far west, toward Richmond Beach, there is absolutely no place to pedestrian shop, walking from business to business. This plan, particularly Alternative A, would be an important step in making a much nicer, more shopper-friendly city, in addition to the added safety we'd get by doing something about the sometimes chaotic traffic on that segment of Aurora.

Jeff Crisafulli  
 15540 32nd Ave. NE  
 Shoreline  
 (206) 368-7553



Join the world's largest e-mail service with MSN Hotmail.  
<http://www.hotmail.com>

August 13, 2002



Elizabeth Healy  
Kirk McKinley  
Phil Fordyce

Dear Elizabeth, Kirk and Phil,

I would like to respond to the proposed Aurora Corridor Project, the State of Washington SEPA and the FHWA NEPA EA.

On June 4, 2001, a letter was forwarded to Secretary of Transportation, Mr. Douglas B. MacDonald, informing him of the decision for the City of Shoreline to perform a more comprehensive environmental review. The reason stated, was lack of understanding of the project by businesses and property owners along the corridor. In fact, the City of Shoreline had reported that most businesses favored the city's plan. Nothing could have been more from the truth. Nearly 100% of the businesses surveyed favored a lesser plan.

The Shoreline Merchants Association (formerly the Aurora Improvement Council) favored a narrower footprint for the corridor. That is, narrower sidewalks and maintaining our center lane two-way access. Our section of SR99 is heavily built-out and our businesses are dense, have short lots and depend upon unlimited access from autos along Aurora. There is also a need for adequate Freight Mobility.

S2-1 To date, nothing has been done by the city. Businesses from 145<sup>th</sup> to 165<sup>th</sup> have not been notified. They know nothing of the plans for their particular parcel and many, of foreign extraction, do not understand what is going to happen to them. There has been no socio-economic survey, no study of cumulative (adverse) impacts and no attempts to ameliorate direct effects of the construction or immediate effects upon the businesses. There has been no attempt to address the ability of a business to succeed at all. In short, we feel many will be faced with having an "uneconomic remnant". The City of Shoreline should do more studies to determine the full impact of this project upon our small businesses.

S2-2 The failure of the State of Washington SEPA act to address socio-economics is a serious departure from the FHWA NEPA law. The EA document does not fully address this issue. As you are aware, the letter sent to Mr. MacDonald, addresses our objections. To date, nothing has changed. (Please see letter attached)

S2-3 We have been left out of the process, rebuked by our city council, and called undemocratic by another group. We feel we are, indeed, a part of the system. However, we feel forgotten by the system. There is a failure by the SEPA EIS document to adequately address adverse issues and, instead, to gloss over important environmental issues.

(2)

The Shoreline Merchants Association and the Concerned Citizens of Shoreline ask that the FHWA require that the City of Shoreline to complete an Environmental Impact Statement on the entire Aurora Corridor Project from N. 145<sup>th</sup> St. to N. 205<sup>th</sup> St., that they do a comprehensive socio-economic analysis and work with businesses and property owners to find a way to preserve our economic base along Aurora Avenue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Myron G. Phillips', with a large, loopy flourish at the end.

Myron G. Phillips, DVM  
Co-Chairman, The Shoreline Merchants Association  
18019 Aurora Ave. No.  
Shoreline, WA 98133



U.S. Department  
of Transportation

**Federal Highway  
Administration**

Washington Division

Suite 501 Evergreen Plaza  
711 South Capitol Way  
Olympia, Washington 98501-1284  
(360) 753-9480  
(360) 753-9889 (FAX)  
<http://www.fhwa.dot.gov/wadiv>

June 4, 2001

HFO-WA.4/SR 99 Route File

Mr. Douglas B. MacDonald  
Secretary of Transportation  
Department of Transportation  
Olympia, Washington

Attention: Paula Hammond

**RE: SR 99, Aurora, City of Shoreline  
Notice of Public Controversy**

Dear Mr. MacDonald:

On May 18, 2001, members of the Aurora Improvement Council (AIC) and Concerned Citizens of Shoreline (CCS) met with Elizabeth Healy, FHWA, and Brian Hasselbach, WSDOT H&LP. During this meeting, AIC and CCS presented a signature list of the people and business owners that are opposed to the proposed project as it is currently designed. The signature list is enclosed.

Per 23 CFR 771.117(b), "Any action which normally would be classified as a CE but could involve unusual circumstances will require the Administration, in cooperation with the applicant, to conduct appropriate environmental studies to determine if the CE classification is proper. Such unusual circumstances include:...(2) Substantial controversy on environmental grounds."

In this meeting, several people voiced the complaint that, while the City of Shoreline has provided opportunities for people to comment on the proposed project, the City has not responded to their comments and questions. In order for FHWA to assure that the public's comments and questions are being adequately addressed, we will require that a public hearing be held for this project. We will need to review the hearing transcript and approve the City's responses to all comments.

Furthermore, when FHWA originally agreed that the project from 145<sup>th</sup> to 165<sup>th</sup> was a Class II project, this decision was based on the information provided to us that there was no public controversy. Since our decision was made using incorrect information, we also need to discuss whether it is appropriate to change from a Class II project to a Class III project, as a result of the public controversy.

If you have any questions or comments, please contact me at (360) 753-8655.

Sincerely,

HARRY R. BENNETTS  
Acting Division Administrator

**Elizabeth Healy**

By: Elizabeth Healy  
Transportation & Environmental Engineer

Enclosure

Cc: Al King, OSC  
Brian Hasselbach, OSC(w/enclosure)  
Terry Paananen, Local Programs Engineer, NWR, WSDOT(w/enclosure)  
Anne T-H, Project Manager, City of Shoreline(w/enclosure)  
Myron Phillips, AIC



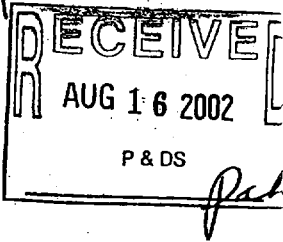
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SHORELINE

AURORA CORRIDOR

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET



## Aurora Avenue 145-165 Open House August 6, 2002

### General Public Comment Form -- Not for EIS

Name C. D. EDMUNDSONAddress 19275 Stone Ave N.  
Shoreline WA 98133Phone (206) 546-3793Comments:

I attended many meetings during the formation & early days of the City of Shoreline. I heard the comments & desires of the people of Shoreline. It became obvious early on that there was a small, but dedicated group of individuals with grandiose ideas who were not interested in the least in listening to anyone & were going to press their agenda regardless of what was expressed at the public meetings.

Some of that group were present at the hearing on 6 AUG 02 using phrases like:

"The people demanded such & such", when in fact it was only some of the people expressing a preference for such & such;

"The law requires.", when in fact the law says no such thing;

And "Aurora is the most dangerous highway in the state.", when in fact the DOT who keeps the data on this subject, says it is not.

These people were pushing Alt. A.

Name calling is a tactic used by people in weak positions with invalid arguments. Two proponents of Alt. A used this tactic which casts question on the veracity of their position of support.

We profess to be doing this Aurora Corridor improvement in part to attract business. Yet, the evidence indicates we are driving it away as fast as leases expire. For example, Underwood who has been at the same location 10 years will soon leave, as he expressed, because of the Aurora Corridor project. We wish to attract business? Yet, their proposal, Alt. C, which I heard about at the hearing, is not being considered? Give me a break!

Twelve foot side walks? For the less than 1% of the Shoreline population that walk anywhere? You're kidding! Seven feet is more than adequate.

I cannot support Alts. A or B until Alt. C is considered & I have had the opportunity to see the comparison.

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

Comments must be received no later than Friday, August 16, 2002 5 p.m.

V.t.g.

Any city council member that votes for Alt. A or B without public consideration counts on my vote for his opponent at the next election.

53A

53B

53C

53D

53E

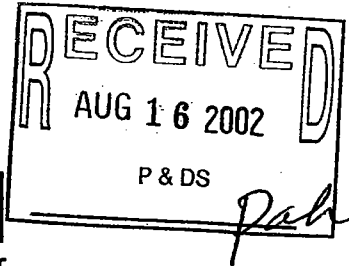




3:40 PM

CITY OF  
**SHORELINE****AURORA****CORRIDOR**

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET

**Aurora Avenue 145-165 Open House and Hearing 8/6/02  
Public Comment Form**Name C.D. EdmundsonAddress 19275 Stone Ave N  
Shoreline WA 98133Phone (206) 546-3793**Comments on the EA/Draft EIS:**

53-4 As what is built in the southern third of the Aurora Corridor will surely dictate  
 53-5 what is built in the central & northern thirds of the corridor it is totally invalid  
 and inappropriate to present an impact statement that deals only with the southern  
 third of the corridor.

53-6 The storm water facilities ("treatment") (actually traps with a fancy name) are  
 completely inadequate. To function properly they must be maintained & cleaned-  
 out regularly (a highly improbable scenario) or trapped oil & trash will simply wash  
 through (which is what has been going on for years at the 165<sup>th</sup> St N. Metro Park &  
 Ride. Further, even when functioning properly, such traps do nothing to remove  
 engine coolants, windshield washer detergents or fine engine & tire wear residues  
 which contain numerous toxic compounds.

53-7 The "Summary of Operational Impacts" is sketchy to say the least & is very Pollyannaish  
 in its comments.

53-8 The "Water Quality/Surface Water" section ~~has~~ statements do not jibe. More impervious  
 surface means more run off & more stream degradation. The additional impervious surfaces  
 paved by all the "attracted businesses" was not even considered. My conservative thumbnail  
 estimate is that in downpour conditions a surge of 100,000 gallons of water could be  
 dumped into the watershed system in a very short period of time. This would result  
 in "improved water quality"? & would "stable run off rates" to receiving streams? I don't  
 think so!

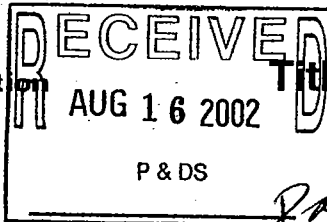
**I AM COMPLETELY OPPOSED TO GOING AHEAD WITH THE PROJECT BASED ON  
 THIS ENVIRONMENTAL IMPACT STATEMENT. JUST ON THESE POINTS ALONE**

Much more could be said, like, what is this ALT "C" I heard about at the meeting & why  
 wasn't it considered? We're supposed to be attracting business when all the evidence indicates

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

Comments must be received no later than Friday, August 16, 2002 5 p.m.



## Title VI Public Involvement

Title VI of the Civil Rights Act of 1964 requires the Washington State Department of Transportation (WSDOT) to gather statistical data on participants and beneficiaries of the Department's federal-aid highway programs and activities. WSDOT collects information on race, color, national origin and gender of the attendees to this public hearing to ensure the inclusion of all segments of the population affected by a proposed project.

The Department wishes to clarify that this information gathering process is **completely voluntary** and that you are not required to disclose the statistical data requested in order to participate in this meeting.

The information gathered will be handled as privately as possible by WSDOT's Hearing Coordinator and the Office of Equal Opportunity (OEO). For further information regarding this process, please contact the Title VI Coordinator by phone at 360-705-7098 or e-mail at [riveraj@wsdot.wa.gov](mailto:riveraj@wsdot.wa.gov).

Please respond to the following questions:

Project Name <u>Aurora Ave. North Multimodal Corridor Project:</u> <u>North 145th Street to North 165th St.</u>		Date <u>6 JUL 02</u>
Hearing Location <u>Shoreline Room @ Shoreline Conference Center</u>		
Name (Please print): <u>C.D. Edmundson</u>		Gender: <input checked="" type="checkbox"/> Male <input type="checkbox"/> Female
General Ethnic Identification Categories (Check one): <input type="checkbox"/> Caucasian <input type="checkbox"/> Hispanic American <input type="checkbox"/> American Indian/Alaskan Native <input type="checkbox"/> African American <input type="checkbox"/> Asian/Pacific Islander <input checked="" type="checkbox"/> Other <u>Heinz</u>		
Color <u>Pinkish tan</u>	National Origin <u>England, Scotland, Ireland, France, Italy, Turkey, Finland, Sweden, Denmark, Norway, Germany,</u>	

After you complete this form, please fold it and place it inside the designated box on the registration table.

*The IES was a joke!*  
*CDE*

**Thank you for your cooperation!**

August 13, 2002

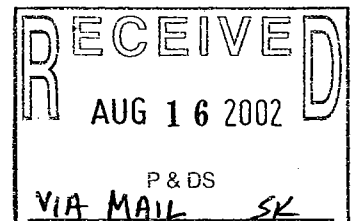
Aurora Corridor Responsible SEPA Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133-4921

Dear Aurora Corridor SEPA Official:

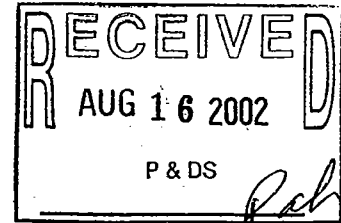
54-1 I do a lot of shopping at businesses along Aurora Avenue and I believe it will be more convenient to shop when there is a sidewalk. I think the planting strip will make it look more attractive along this strip of highway. I like what is being proposed in Alternative A. I think a median is needed in the middle of the roadway because I have seen many cars almost collide and at other times I have seen people standing in this area and cars rapidly race toward them. I think the present left turn lane is dangerous and should be removed as soon as possible.

Sincerely,

Lacey K. O'Neil  
Lacey O'Neil  
19840 8<sup>th</sup> Avenue NW  
Shoreline, WA 98177



Timothy Stewart, ACIP  
 City of Shoreline  
 17544 Midvale Ave N  
 Shoreline, WA. 98133-4921



2:45 PM

August 15, 2002.

RE: City of Shoreline AURORA CORRIDOR "Transportation Solutions for Shoreline's Main Street"  
 Storm water comments on the EA/Draft EIS

The information about Thornton Creek in the EIS is incorrect. The historical channel of Thornton Creek is depicted on all historical maps as having a westerly flow, or bend, once it enters Shoreline directed West towards Aurora just North of Bitter Lake. (See attachment #1 a 1897 map 3 pages)

55-1 What the report refers to as the Western Tributary is actually the historical North Fork of Thornton Creek. Contrary to the report, the storm water flows directed towards Thornton Creek off the Aurora Project will not only enter the Thornton Creek main channel, but also it's historical path. The City of Shorelines storm drain stenciling project map, depicts open waterways of notable size within 3 blocks of Aurora conveying directly into Thornton Creek. (See attachment #2, City of Shoreline map)

The City of Shorelines stream inventory report, paid for and completed with tax dollars, is 9 months over-due. The report claims the main channel of Thornton Creek and Ronald Bog/Twin Ponds water are separate entities. Attached is a contract from 1963 when I-5 went in specifically describing the two courses of Thornton Creek. The present main stem flows to the west through the ponds and the conveyance along the freeway is an overflow side channel. (See attachment #3 1963 contract with King County & Washington State Highway Commission 6 pages) This contract dealt with water and fish rights retained for 2326 N. 155<sup>th</sup> St when the freeway came through.

The present headwaters of Thornton Creek are Ronald Bog, and that main flow water goes through Twin Ponds where it joins with the Historical Western Channel. We speculate the main flow coming from Ronald Bog was greatly increased after the removal of the peat from both Ronald Bog and Twin Ponds. This possibly created the larger flow from the north/Ronald Bog tributary. (See Attachment #4 Seattle Public Utilities Thornton Creek Watershed Map)

Other Points are:

- 55-2
- The Densmore Watershed so described in the EIS document seems to have been considered an impact. Has there ever been a representative from this watershed at a public hearing. Have they been informed as far down as Green Lake & Lake Union where this water will end up? The stormwater from this job will directly reach 1. The Puget Sound 2. Lake Washington 3. Lake Union through multiple stream conveyances. This is not strictly a local issue when it effects water. This project effects the entire region. Has comment from those effected areas downstream been solicited by the City of Shoreline about this projects effects on them?

- 55-3
- Highway 99 runs through at least 4 separate, but over-lapping water sheds in Shoreline. This EIS was supposed to be based in science. The fact that this project is split up by man-made

SS-3  
CONT.

surveyed lines through the middle of a watershed, in which you plan to work on both sides of the line but only examine one side at a time. Is this biology? We will never know the full extent on the environment caused by this project unless it is looked at completely from where the water starts and takes a pursuit of the truth (science) downstream to where it is going to be deposited.

SS-4

- This projects storm water compliance is based on general construction standards. Thornton Creek is under the ESA standards. Where are the protections for the fish? Proper protection standards for salmon creeks and especially creeks that support endangered species need to be implemented above and beyond general development standards.

SS-5

- All Shoreline creeks contain salmonids. All salmonids are considered priority species worthy of special protections by Washington State Fish & Wildlife Habitat Management Plan for Salmonids. The values of these fish to us or the fishes own specific needs were not fully addressed temperature of storm water is a big concern for discharging storm water into a fish creek and the projects impacts on temperature were not addressed. Existing conveyance is not being upgraded. This conveyance is already well over capacity as is reflected by The City of Shorelines Capital Improvements Projects. Taxpayers are spending millions on Ronald Bog to update old conveyance that is failing and causing damage to homeowners and the same on Third Ave NW. There is a long waiting list for other areas with drainage problems.

SS-6

- The Shoreline Sinkhole was highlighted with national news coverage and our city was bailed out with federal disaster funds for this drainage collapse.

SS-7

- The new system being planned is to only handle the net additional impervious surfaces added by the project. This ignores the fact that existing impervious surface that now drains to a built, but non-channelized environment.
- Present flows are not channalized or collected by a system of curbs and gutters. Some natural soil absorption of storm water runoff happens now in it's pre-project state.
- All storm water within this project is going to be channeled and captured including the flows from the old existing impervious surface. This will create a man made river down the highway, Old and new surfaces being connected and creating a flow as large as the entire highway directed towards capturing devises (catch basins).

SS-8

- The catch basin technology this project offers only consists of oil filtering capabilities. Large acreages of auto habitat is being created with this project. Autos drop or leak on to the pavement other fluids such as antifreeze and gasoline at a higher rate than oil. Oil water separators are merely a catch basin with a "T" in it and do not filter water-soluble pollutants.

SS-9

- The impact for the unaccounted impervious surface is not being addressed or handled by this project. Therefore, storm water projections in the EIS are incorrect.
- The stream inventory is not being released. All of the relevant biological information on our streams in the City of Shoreline is being withheld from the public. The stream inventory was to be a tool used during land use decisions that would protect our natural resources.
- Not only is Best Available Science not being used but also Available Science (stream inventory) is being withheld from this process. Why? Does it offer what we as citizens paid for, a tool that would help protect our natural resources from bad land use decisions.

- The new system highlights water quality because this is what the project offers. The apparatus being planned for this are the cheapest method available and offer only oil pollutant filtering. An "Oil & Water Separator" is merely a regular catch basin with a "T" installed within it.

SS-10 • Catch basins are only as effective as the maintenance being provided on them. No mention of maintenance assurances were included in the EIS. The City of Shoreline took over 5 years after becoming a city to begin cleaning basins on Thornton Creek. I (Patty Crawford/Twin Ponds Fish Friends) have personal knowledge that the neighborhood ponds Sunde Pond, Twin Ponds & Peverly Pond (all in the area of where the Aurora project will discharge storm water) These ponds have lost 3 to 5 feet of depth because of sediments that are not removed by the City of Shoreline.

- Are our natural Ponds are just big catch basins for the City of Shoreline to convey storm water. The City of Shoreline collects large fees from taxpayers for this utility and has contributed nothing back to the creeks. The storm water from the new "Walgreens" on Aurora was sent into Thornton Creek and was mitigated with the pretty, "Welcome to Shoreline" sign out front.

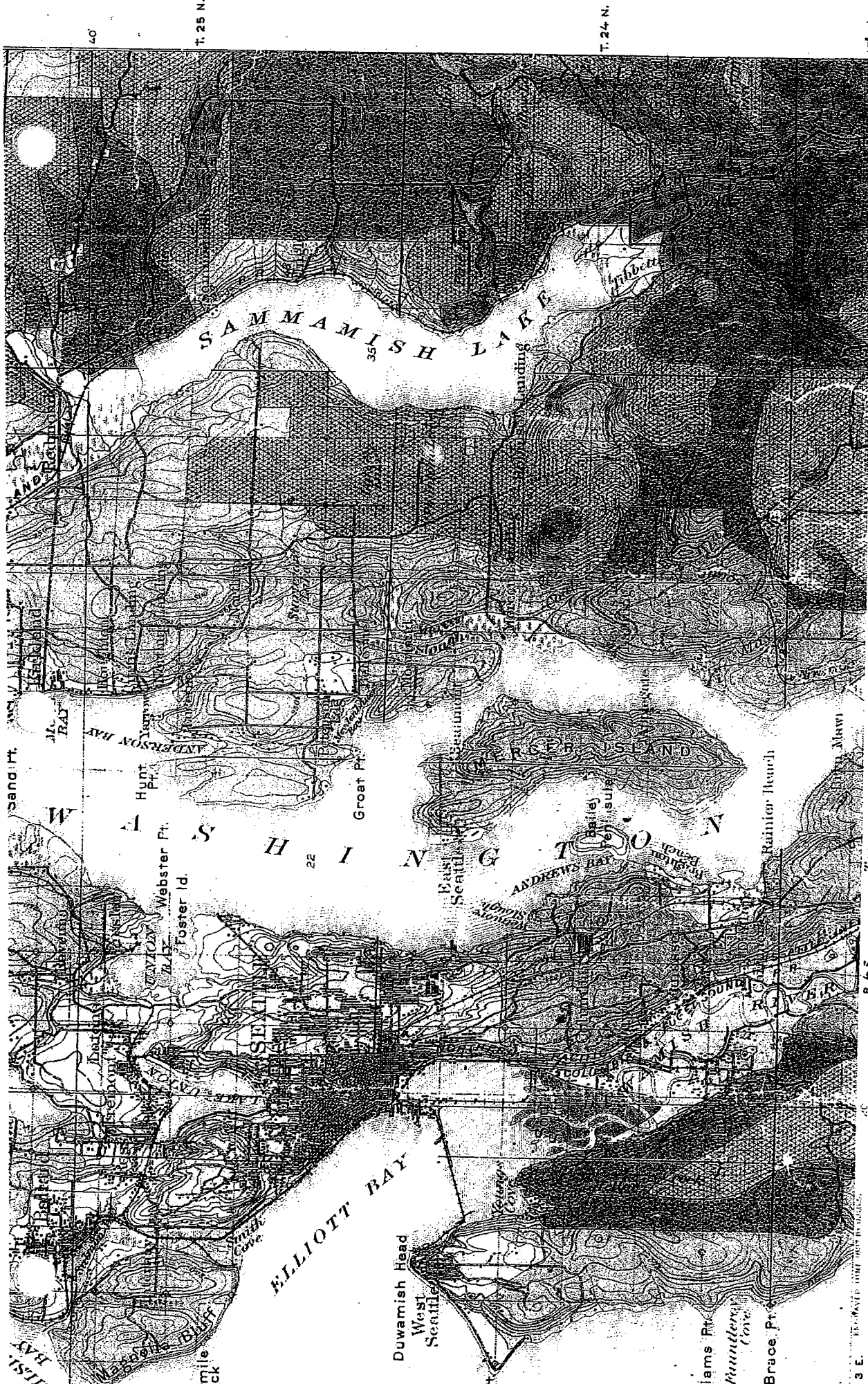
- Further degradation of our Chinook stream in Shoreline will occur by using general development standards as goals and not having requirements and assurances to properly protect the salmon creeks of Shoreline.

SS-11 • Quantity issues or proper detention is not addressed and if based on net impervious surface numbers, is insufficient to protect our natural waterways. This project is using our natural waterways to dispose of the newly captured storm water runoff from priory existing impervious surfaces and is not mitigating those impacts. In fact, this storm water river generated by this project will all have to be conveyed by existing conveyance structures that are at the end of their lives.

SS-12 • Twin Ponds is a valuable recreational site with great fishing available to Shoreline residents young and old. Washington Dept. of Fish & Wildlife has designated Twin Ponds as a Childrens Fishing area. This was not mentioned in the EIS and is a very important part of the fisheries recourses in Thornton Creek. Storm water from the Aurora project will enter the main channel of Thornton Creek in the South Pond Of Twin Ponds. The South pond is successfully fished on a regular basis. What will happen to the fishery when the Aurora storm water inundates the south pond? (See Attachment #5 City of Shoreline advertisement for the assets of our city.) This EIS report does not reflect the true value or uniqueness of these historical community gems which are, our water features.

Commenting for: Shoreline Merchants Association

Patty Crawford With Twin Ponds Fish Friends



R. 6 E. 122° 30'

Henry Gaunett, Geographer in charge.  
Land classification by J. W. Rankine  
and G. H. Plummer.  
Surveyed in 1897.

UNIV. OF WASHINGTON  
MAP CENTER  
SUZZALLO LIBRARY

R. 5 E.

Scale 1:25,000

1 inch = 2 miles  
1:25,000  
Contour interval 50 feet.  
Indian to mean water level.  
Edition of May 1900.

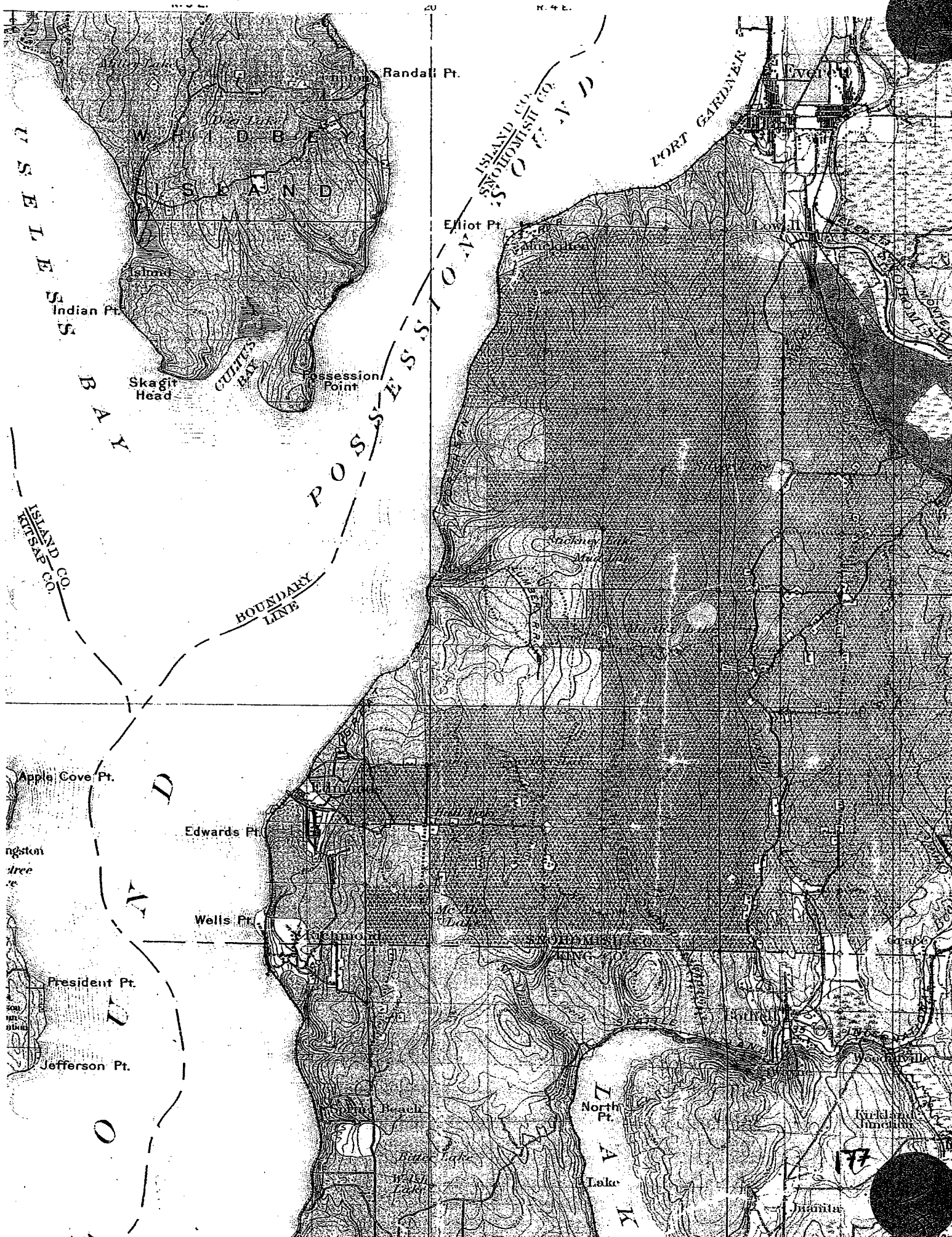
R. 4 E.

R. 3 E.











# Storm Drain Stenciling Project

SCHOOL NAME:  
PARKWOOD

## Legend

- <all other values>
- TYPE
- Ditch
  - Natural Stream
  - Outside City
  - - - - - Piped
  - Open Water

For regulatory purposes, stream segments within a reach are classified on a site specific basis. This map provides a general guide of stream classification.

1 inch equals 300 feet

0 75 150 300 450 600 Feet

Date: 4/15/02

CITY OF  
SHORELINE

Filename: schools\_streams2.mxd 8:43:36 AM



## AGREEMENT

THIS AGREEMENT, entered into in triplicate by and between THE WASHINGTON STATE HIGHWAY COMMISSION, through its authorized agent in the Department of Highways, hereinafter referred to as the State, and KING COUNTY, and PRYDE HOMES, INC., a Washington corporation, hereinafter referred to as Pryde, and ARNE SUNDE, hereinafter referred to as Sunde,

## WITNESSETH:

THAT WHEREAS, Pryde is the owner of property which it is in the process of developing, and which is outlined in green on the attached map which is marked Exhibit "1" and attached hereto and by this reference made a part hereof, and said Pryde property is legally described as follows:

That portion of Tract 10, Green Lake Five Acre Tracts to the City of Seattle as recorded in Volume 11 of of Plats, page 72, records of King County, Washington, lying westerly of the westerly right of way line of Primary State Highway No. 1;

and

WHEREAS, Sunde is the owner, as his separate property, of that certain property lying immediately adjacent and southerly of the Pryde property as depicted on Exhibit "1" and which is legally described as follows:

The West 140 feet of the East 430 feet of Tract 9, Block 1, Green Lake Five Acre Tracts to the City of Seattle, recorded in Volume 11 of Plats, page 72, records of King County, Washington;

and

WHEREAS, the State is in the process of planning and constructing a highway known as Primary State Highway No. 1, Seattle

Freeway, which is to be located in part immediately adjacent and southerly to the Pryde property as depicted in Exhibit "1;" and

WHEREAS, the parties hereto have a joint drainage problem of surface waters which flow over an existing creek bed which first runs across the State Freeway property and onto the Pryde property at a point designated "A" on Exhibit "1" which begins at a point at the intersection of the westerly right of way line of Primary State Highway No. 1, with a line 347.00 feet northerly of and parallel to the south line of Tract 10, Green Lake Five Acre Tracts to the City of Seattle, as recorded in Volume 11 of Plate, page 72, records of King County, Washington. Said existing creek then proceeds across the Pryde property in the approximate location as shown on Exhibit "1" and intersects and crosses onto the Sundt property at a point which is designated "B" on Exhibit "1" and which lies westerly approximately 124 feet from the southeasterly corner of Pryde's property herein described;

NOW, THEREFORE, the parties hereto in consideration of the agreements, promises and covenants contained herein, agree as follows:

1. Obligation and Agreements of Pryde:

A. Pryde to install at his earliest convenience a temporary open ditch for the purpose of diverting the surface water draining across the existing creek bed. Said diversion is to begin at a point five feet westerly on point "A" on Exhibit "1," and run in a southerly direction parallel with the westerly boundary line of the State Freeway, to a point five feet northerly and

56413524  
easterly of the southwest corner of the said Pryde property, and then continuing over the easement described in the following paragraph to point "B" as depicted on Exhibit "1."

B. Pryde agrees to grant, bargain, sell, convey, transfer and deliver unto King County a permanent easement for the purpose of diverting across said easement the drainage of surface waters. Said easement is described as follows:

The South 10 feet in width of the east 134 feet (as measured along the south line) of that portion of Tract 10, Green Lake Five Acre Tracts to the City of Seattle, as recorded in Volume 11 of Plats, page 72, records of King County, Washington, lying westerly of the westerly right of way line of Primary State Highway No. 1.

Upon the installation of the stub-out by the State as hereinafter provided, Pryde shall, at his own expense, and for the benefit of Sunde, construct and install along the mid-line of the above described easement, a 24 inch concrete culvert, by connecting the same to the State stub-out and continuing the same to point "B" on Exhibit "1" as above described, and further shall provide rip-rap protection at the terminus of said concrete culvert which has hereinbefore been designated point B. It is understood and agreed that the purpose of said installation is to allow the redirection of the first 17 C.F.S. (or less) flow of surface water back into its normal drainage course across the Sunde property.

C. Pryde hereby agrees to release the State from any claim or damages for the diversion of surface waters as herein provided in this contract by the State and to hold harmless the said State against any such action, claim or demand by Pryde, its heirs, <sup>or</sup> assigns, resulting from the diversion of surface waters as herein provided.

2, Obligation and Agreements by Sunde:

A. Sunde hereby grants, bargains, sells, conveys, transfers and delivers to Pryde the permanent right to dispose of and drain off surface waters to be collected in a catch basin located at the terminus of North 156th Place on the proposed plat of Pryde's Meridian Terrace No. 3, which is depicted on Exhibit 1 herein. Included in said right is the agreement and permission to allow the installation by Pryde of a 12 inch concrete culvert at which terminus a catch basin will be constructed by Pryde from which it shall then flow into the 24 inch concrete culvert hereinabove referred to and ultimately into the natural drainage course across the Sunde property as above described. The said 12 inch concrete culvert shall be installed over the following described property:

That portion of Tract 10, Green Lake Five Acre Tracts to the City of Seattle, as recorded in Volume 11 of Plats, at page 72, records of King County, Washington, described as:

A 10 foot wide strip of land lying five feet on each side of a line beginning at a point on the south line of said Tract 10 from which the south-west corner of Tract 10 bears north  $87^{\circ}58'12''$  west 303.07 feet; thence north  $25^{\circ}00'08''$  west 122.37 feet to the northerly terminus of said line and 10 foot strip (bearings refer to K.C.A.S. Meridian).

And, their heirs and assigns, agree that they shall permanently

accept all surface waters which flow through the two concrete culverts which are to be installed by Pryde in accordance with this agreement, and at no time shall cause said waters to be diverted back upon the State Freeway or Pryde's property.

3. Obligations and Agreements by State:

A. The State agrees during the course of constructing the Freeway as above described to install a permanent ditch, or culvert within the boundaries of said Freeway and at such time as said open ditch, or culvert is constructed to then divert all surface waters flowing onto Pryde's property at point "A" as designated on Exhibit "1" into said permanent open ditch, or culvert.

B. The State shall construct and install a stub-out which will divert the first 17 C.F.S. (or less) of surface water flow at a point opposite designated point "C" on Exhibit "1" so that Pryde can continue the 24 inch culvert and connect the same with the said stub-out. The installation of the permanent open ditch and stub-out to be at the sole cost and expense of the State.

C. The State hereby grants to Pryde and/or King County the right to enter upon the State property within the above described Freeway for purposes of connecting said stub-out to the 24 inch concrete culvert.

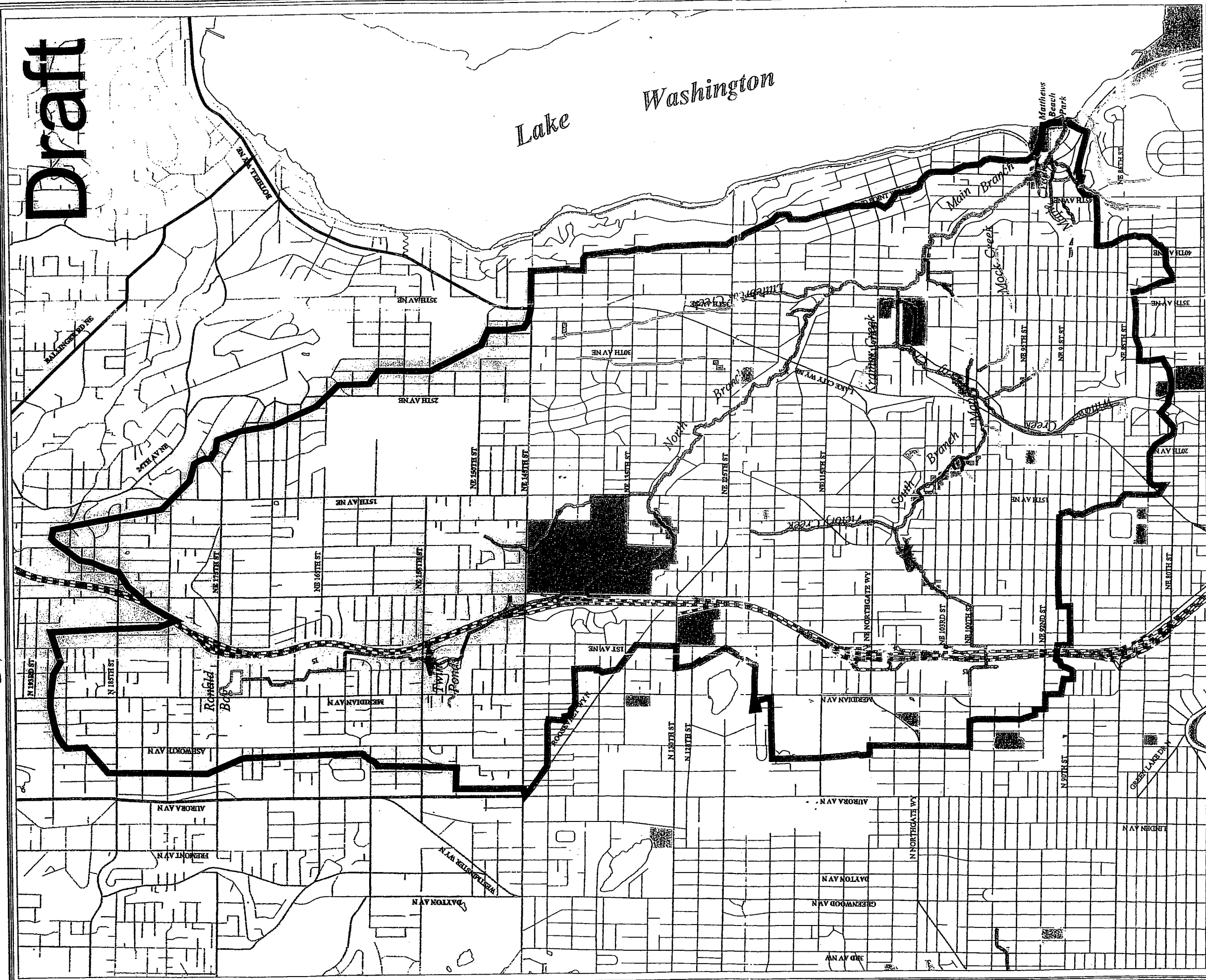
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Approved as to form:  
Robert C. Lindgard  
Assistant Attorney General



EXHIBIT 5-7

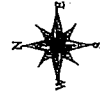
Draft



## Stream Type Characterization: Thornton Creek

Produced by Seattle Public Utilities  
August 18, 1999  
THE CITY OF SEATTLE, 1999. All rights reserved.  
No guarantee of any sort implied, including accuracy, completeness, or fitness for use.

The City of Seattle



### Legend

Fish Distribution	Stream Type	Streets
Furthest Anadromous Fish Sighting	Type II	Residential
Furthest Resident Fish Sighting	Type III	Arterials
	Type IV	State Highway
	Type V	Interstate Freeway
	Not Typed	Park
Drainage Basin Boundary		

1000 0 1000 Feet



**Shoreline City Council**

Scott Jepsen  
Mayor

Ron Hansen  
Deputy Mayor

Kevin Grossman  
Rich Gustafson  
Cheryl Lee  
Linda Montgomery  
Bob Ransom

Shoreline Customer Response Team  
(206) 546-1700

Parks, Recreation & Cultural Services  
(206) 546-5041

Planning & Development Services  
(206) 546-1811

Shoreline Police Department  
(206) 546-6730



17544 Midvale Ave. N. • Shoreline, Washington 98133  
(206) 546-1700 • [www.cityofshoreline.com](http://www.cityofshoreline.com)

**2001**

# City of Shoreline

Although it is a new city, Shoreline has a unique history and character derived from original settlements dating back to the late 1800s. The quality that drew early settlers to the area remains dominant to this day: location. The City of Shoreline offers classic Puget Sound beauty and the convenience of suburban living with the attractions of nearby urban opportunities.

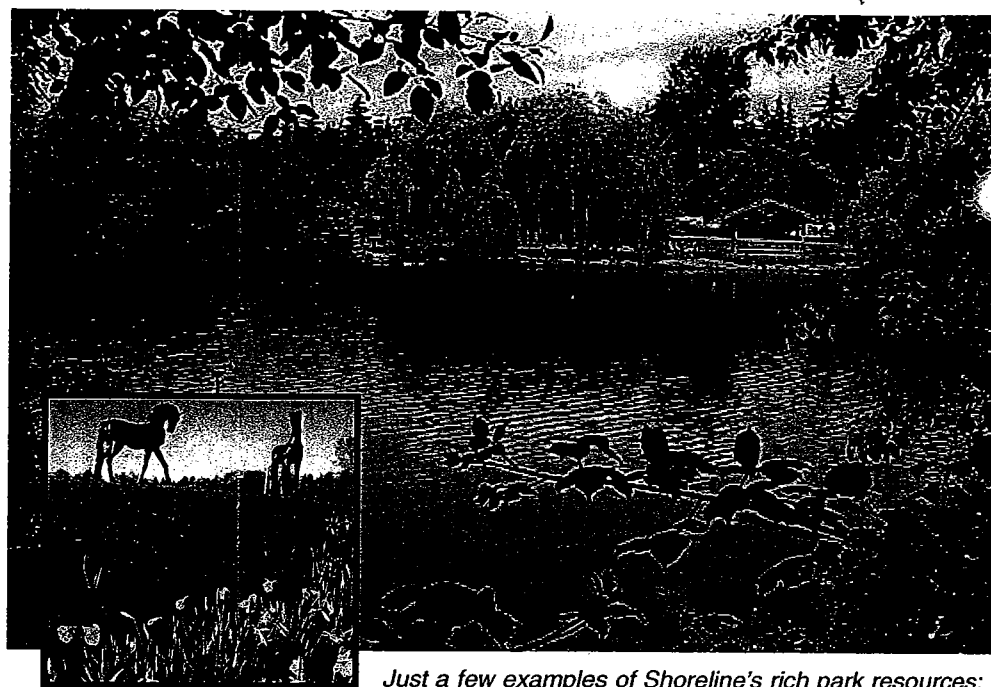
Before becoming a city in 1995, the City of Shoreline was an island of unincorporated King County surrounded by the older cities of Seattle, Edmonds, Woodway and Lake Forest Park.

Covering 11.5 square miles, Shoreline is Washington's thirteenth largest city with more than 53,000 residents. It is primarily residential with more than 70 percent of the households being single-family residences.



Over the years, the Shoreline community has developed a reputation for strong neighborhoods, excellent schools and abundant parks.

The City of Shoreline operates as a code city under the laws of the State of Washington with a Council-Manager form of government. The City's seven part-time elected Councilmembers choose a Mayor and Deputy Mayor from among their members. More than 100 employees work for the City and Shoreline's budget for 2001 is \$80.5 million.



*Just a few examples of Shoreline's rich park resources: Ronald Bog, above; Richmond Beach Saltwater Park, below and on cover; and Twin Ponds, left.*

## Major City Projects

While there are several transportation landmarks in Shoreline, Aurora Avenue is the City's "Main Street." Running north/south, Aurora — State Route 99 — connects Shoreline with surrounding cities and carries much of Shoreline's commercial development. One of the biggest projects the City is currently working on is the redesign and redevelopment of the three miles of Aurora that run through Shoreline.

An associated City project is developing the Interurban Trail which runs roughly parallel to Aurora. Owned by Seattle City Light, the Interurban is a former rail corridor that runs from Seattle to Everett. Shoreline's plans will link it with other portions of the trail developed by surrounding communities as an open space for non-motorized transportation.

While the majority of Shoreline businesses are located along Aurora, other pockets of commercial activity are found in neighborhood centers. The largest of these is in the North City neighborhood. The City of Shoreline recently completed a North City Subarea Plan to encourage redevelopment of this neighborhood center into a thriving business community. Plans are underway to develop the infrastructure to support economic redevelopment.

## Our History

In the 1880s, Richmond Beach was among the towns planned by speculators in anticipation of the transcontinental railroad route. Suburban growth in Shoreline increased with the construction of the Seattle- Everett Interurban line in 1906 and the paving of the North Truck Road with bricks in 1913.

During the early twentieth century, Shoreline's rural yet accessible location attracted large developments such as the

Highlands and Seattle Golf Club and the Firland Tuberculosis Sanitarium which is now CRISTA Ministries. Commercial centers formed around the Interurban stops at Ronald (175th and Aurora) and Richmond Highlands (185th and Aurora).

While development slowed during the depression, the end of World War II brought a demand for family housing. In 1944, the name "Shoreline" was first used to describe the school district and the community which went from city line to county line and from the shore of Puget Sound to the shore of Lake Washington.



**Log # 56****Kirk McKinley - Shoreline Aurora Corridor DEIS**

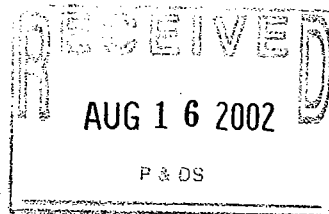
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**From:** <HIGHARENA@aol.com>  
**To:** <tstewart@ci.shoreline.wa.us>, <kmckinle@ci.shoreline.wa.us>, <elizabeth.healy@fhwa.dot.gov>, <fordyce@wsdot.wa.gov>, <senator\_murray@murray.senate.gov>, <senator\_cantwell@cantwell.senate.gov>, <jay.inslee@mail.house.gov>, <fairley\_da@leg.wa.gov>, <chase\_ma@leg.wa.gov>, <kagi\_ru@leg.wa.gov>  
**Date:** 8/16/2002 10:58 AM  
**Subject:** Shoreline Aurora Corridor DEIS

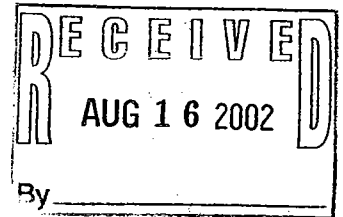
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The attached letter was mailed on July 25, 2002. I have not received a response from any of the parties it was mailed to. Please direct responses to Walt Hagen at: whagen@cmc.net. Thank you.

Respectfully yours,  
Diana L. Stephens,  
Secretary, Shoreline Merchants Association



July 25, 2002



Timothy M. Stewart, AICP  
SEPA Responsible Official

Kirk McKinley  
Aurora Corridor Project Manager

City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133

I am writing to request an extension of the written comment period for the Draft Environmental Impact Statement (DEIS) for the Aurora Corridor Project, as allowed  
56-1 for in the WAC 197-11-455 (7). The cutoff date of August 16<sup>th</sup>, 2002 does not allow enough time to review all of the associated documents.

- 56-2 ➤ Appendices C, D and E were not included in the original DEIS that was available on July 10, 2002.
- 56-3 ➤ The Discipline reports are not included in the DEIS. According to the DEIS these documents are "...available for **review**..." at three locations. It is implicit in this statement that copies will not be made available for those who wish to peruse these documents at their leisure. Also, these reports are typically included in a DEIS. Making people go to the reports is time consuming for most and physically impossible for some, not to mention that the three locations are not accessible after normal business hours. This precludes the general working public from reviewing the Discipline reports. As WAC 468-12-455 states "...the draft EIS shall be made available at public libraries..." The

56-3  
cont.

Discipline reports are part of the DEIS and should be available at public libraries as well. Without these reports to review, the DEIS is incomplete.

56-4

- I personally requested a copy of the DEIS several times, as had several other people. According to the WAC 197-11-455 "A draft EIS shall be issued by the responsible official and sent to the following...(g) Any person requesting a copy of the EIS from the lead agency". Of the people I personally know that requested copies of this document, none of us were sent a copy.

I am requesting that the written comment period on the Draft Environmental Impact Statement be extended until 5:00 pm on Tuesday September 3, 2002.

Sincerely,

Diana L. Stephens  
Highland Ice Arena  
18005 Aurora Avenue North  
Shoreline, WA 98133  
206-546-2431  
[higharena@aol.com](mailto:higharena@aol.com)

cc Elizabeth Healy, FHWA  
Phil Fordyce, WSDOT  
US Senator Patty Murray  
US Senator Maria Cantwell  
1<sup>st</sup> District Washington, US Representative Jay Inslee  
32<sup>nd</sup> District Senator Darlene Fairley  
32<sup>nd</sup> District Representative Maralyn Chase  
32<sup>nd</sup> District Representative Ruth Kagi



**King County  
Department of Transportation  
Metro Transit**

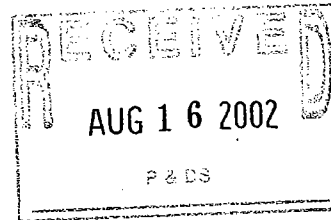
201 South Jackson Street  
Seattle, WA 98104-3856

August 16, 2002

Mr. Timothy Stewart  
Planning Director  
City of Shoreline  
17544 Midvale Ave N  
Shoreline, WA 98133

Post-it® Fax Note 7671		Date 8/16/02	# of pages 2
To Timothy Stewart		From	
Co./Dept. City of Shoreline		Co. King Co. Metro	
Phone #		Phone #	
Fax # 546-0780		Fax #	

**Log # 57**



**Re: Comments on the Draft Environmental Assessment and Environmental Impact Statement for the Aurora Avenue North Multi-Modal Corridor Project, N 145<sup>th</sup> to N 165<sup>th</sup>**

Dear Mr. Stewart:

On behalf of King County Metro Transit, I want to offer our support for the City of Shoreline's proposed improvements to Aurora Avenue North between N 145<sup>th</sup> and N 165<sup>th</sup>.

Aurora is an important transit market. The Route 358 is an important regional connection which operates along the length of Aurora through Shoreline and Seattle. This is one of the most productive routes in the Metro system, carrying approximately 7,000 daily riders, 4,000 of which board and de-board in Shoreline. The Route 358 consistently ranks in the top 5 routes in terms of ridership. Currently on Aurora, buses operate every 10 minutes during the peak hours in the peak direction. Off peak service is available every 20 to 30 minutes. Looking to the future, the Aurora corridor is ripe for additional transit service investments. As financial resources become available, it would be our hope that service levels could be enhanced, particularly during the midday and on weekends.

Over the years, King County Metro has worked cooperatively with the City of Shoreline to improve the Aurora corridor for transit operations. The Aurora Village Transit Center, which opened for service in 1983, was renovated and reopened for service in April, 2002. Shoreline was one of our first city partners to install and operate transit signal priority. System testing and acceptance was completed in 2002. Prior to that, bus stops have been consolidated to improve transit flow, and a program to upgrade the remaining stops and add additional lighting is underway. All of these actions have incrementally improved the operating environment for transit, and make it a more attractive mode choice.

The proposed redevelopment project for Aurora - the subject of this environmental review process - is one of the most significant actions the City of Shoreline can take to actively promote increased transit in this corridor. This project is needed to insure that transit will carry more and more of the increased trips that are forecast, and for which general purpose roadway capacity will simply not be available.

King County Metro staff have participated in the alternatives analysis and extensive community review process that has brought us to this point. The City of Shoreline and their elected officials are to be commended for their forward-looking vision for Aurora Avenue North, one that succeeds in striking a balance between local and regional needs.

Mr. Timothy Stewart  
City of Shoreline  
August 16, 2002  
Page 2

57-1 King County Metro specifically expresses its support for the following elements of the proposed project:

- Continuous 24-hour business access and transit lanes, consistent with the proposed cross sections in the environmental document;
- Access management measures to address existing and future safety problems;
- Sidewalks, pedestrian crossings and pedestrian refuges to create a pedestrian-friendly environment;
- Continued application of transit signal priority.

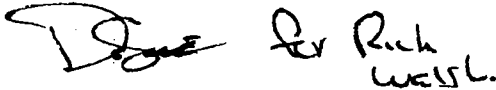
Either of the proposed build alternatives can achieve these four basic objectives. However, we believe that Alternative A will create a more positive pedestrian environment with greater opportunity to provide urban amenities. Consistent with the design principles previously adopted by the Shoreline Council in Council Resolution #156, we believe that during final design, the City should endeavor to minimize business impacts and project costs in those areas where right-of-way is constrained.

We previously demonstrated our support for this project by committing \$500,000 in local County matching funds through interagency agreement. We expect to be able to support this project with additional investments in pedestrian lighting and shelters, as may be agreed upon in the future.

In closing, we urge the city to move forward with final design and construction of the proposed redevelopment project between N. 145<sup>th</sup> and N. 165<sup>th</sup> on Aurora Avenue N. We would further urge you to begin the necessary environmental studies for similar projects from N. 165<sup>th</sup> to the county line. Pending enabling actions by the King County Executive and the King County Council in the future, and budget and appropriation authority permitting, it would be our intent to offer similar levels of financial support to these future projects.

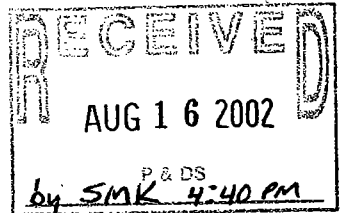
Thank you for the opportunity to provide this input.

Sincerely,



Rick Walsh  
General Manager  
King County Metro Transit





August 16, 2002

Timothy Stewart, ACIP  
City of Shoreline  
17544 Midvale Ave N  
Shoreline, WA. 98133-4921

**RE: City of Shoreline AURORA CORRIDOR Transportation Solutions for Shoreline's Main Street Stormwater comments on the EA/Draft EIS**

I wish to make comments on this plan on behalf of Paramount Park Neighborhood Group and the Thornton Creek Legal Defense Fund. We wish to be parties of record with legal standing on this case and be notified of any an all meetings and decisions.

We have very real concerns about the potential stormwater impacts to Thornton Creek and Boeing Creek. As you know Thornton and Boeing Creeks are both Class II salmon bearing streams with threatened, critical and priority species including, chinook salmon (verified by the SPU, Washington Trout, King County Salmon Watchers, and State Salmon and Steelhead Surveys), coho, sockeye, Steelhead, cutthroat, Great Blue Heron, River Otter, Beaver, Kingfisher, Redtail Hawk, Sharpshinned Hawk, Barred Owl, Coyote, Raccoon, Bald Eagle and many others.

The Seattle Public Utility commissioned a study in 2000-2001 titled, Thornton Creek Basinwide Flow Control Plan, by Entranco, which details the massive stormwater impacts which are now being absorbed by Thornton Creek and by the ratepayers for Seattle Public Utility. The book documents the historic stormwater flooding and erosion problems experienced at the Jackson Park Golf course just downstream from Shoreline. Seattle is planning an enormous stormwater detention pond of approximately 25 acre ft. in size at the Jackson Park Golf Course. This is just one example of the millions of dollars being spent by Seattle to mitigate the current stormwater problems.

The publication states, "In addition to serving as the drainage system, Thornton Creek provides habitat for a variety of fish and wildlife species. As a result of urban development in the watershed over the last century, many changes in Thornton Creek and its riparian corridor have occurred. . . . stormwater rapidly flows across impervious surfaces and causes higher peak flows. As the stormwater flows over roads, parking lots, and other areas of the developed watershed, pollutants such as oil, pesticides, herbicides, and metals are carried into the stream. Stormwater also picks up excessive amounts of soil particles which, when deposited in the stream, may adversely affect aquatic life including salmon and trout, and increased bank erosion."

58-1 The proposed Aurora Corridor Plan has very inadequate detention plans to address the historic and additional stormwater which will be generated new impervious surfaces. It also has not included adequate controls for the pollutants in the runoff

58-1  
CONT.

which will be likely to affect fish and wildlife downstream and human health as well. The Federal Clean Water Act requires municipalities to protect streams and wetlands and the State Environmental Policy Act and Shoreline Critical Areas Ordinance also direct the City to protect the resources downstream from adverse impacts.

Washington Toxics Coalition commissioned a study detailing the impact of pollutants on urban streams and used Thornton Creek as an example. It showed a very great impact on water quality from runoff, including all of the above pollutants and others.

58-2

The City of Shoreline has commissioned a stream inventory but it has not allowed citizens to see the current draft in order to assess the impacts of the proposed Aurora Corridor plan and other developments on Thornton Creek, Boeing, McAleer Creek or any other streams or tributaries. It is also unclear where all the drainage pipes are located or outflow impacts the stream from the data available in the EIS. This should be essential information necessary for citizens and experts to assess impacts to the streams. We object to this lack of information available to citizens and interest groups.

58-3

The presence of salmonids in any of the streams in Shoreline should require the City to implement the Washington State Fish & Wildlife Habitat Management Plan for Salmonids for these streams. They should also be required by the City Critical Areas Code to set aside portions of the watershed as Fish and Wildlife Habitat Conservation Areas. This has not been adequately addressed so far by the City.

58-4

The existing stormwater conveyance is not being adequately upgraded for this Aurora Corridor Plan. This conveyance is already well over capacity as is reflected by The City of Shoreline's Capital Improvements Projects. There are many examples of inadequate stormwater conveyances having drastic impacts on the Shoreline

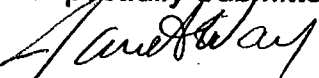
58-5

infrastructure, including the giant sinkhole at NW 175th in 1997. The proposal only addresses the "net" increase in stormwater runoff. It should be required to address the "total" impact of the stormwaters. The total quantity of stormwater impacting Thornton Creek is massive as demonstrated in the above "Entranco" study.

Our groups also have concerns about the impacts of this proposal on small businesses, cumulative impacts of stormwater and traffic on neighborhoods and streams, true impacts of traffic on safety in adjoining neighborhoods and pedestrians therein, and impacts to the City budget and taxpayers.

We feel this plan has not been adequately studied nor have the true impacts really been shown.

Respectfully Submitted,



Janet Way

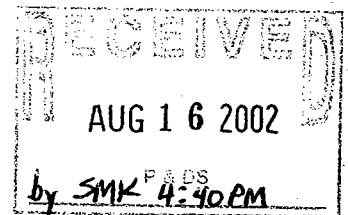
Thornton Creek Legal Defense Fund  
940 NE 147th St., Shoreline, WA 98155



City of Seattle

REVISED  
DRAFT

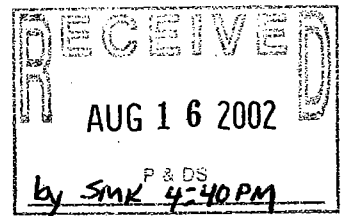
# Thornton Creek Basinwide Flow Control Plan



April 2001



ENTRANCO



BEFORE THE CITY OF SHORELINE HEARING EXAMINER

In re: CRITICAL AREA SPECIAL USE  
PERMIT FOR AEGIS ASSISTED LIVING

Project File No. 201092

STAFF REPORT

I. PROJECT INFORMATION SUMMARY

**Project Description:** Construction of an assisted care facility includes a 3-story building for non-ambulatory elderly with 102 sleeping units. The subject site totals 3.2 acres in area, of which 17,535 square feet is critical area. A stream flows through the wetland. Site work for the project encompasses parking, landscaping, street and stormwater drainage improvements, plus wetland and stream buffer enhancements. Construction permits have been issued but are currently inactive.

**Project Address:** 14900 - 1st Ave NE

**Property Owner and Applicant:** Aegis of Shoreline LLC  
18200 NE Union Hill Rd, Suite 110  
Redmond, WA 98052

**Current Zoning:** R-24 (Residential - 24 Units Per Acre)

**Comprehensive Plan Designation:** HDR (High Density Residential)

**SEPA:** Mitigated Determination of Non-Significance (MDNS)

II. DISCUSSION

1. BACKGROUND INFORMATION

1. *Proposed Project Description*

Aegis of Shoreline LLC proposes to construct a 100,419 square foot, 3-story, assisted care facility for the elderly with 102 fully accessible units. A mix of studio, one-bedroom, and two-bedroom units will be offered to potential residents.

The building will be licensed for non-ambulatory residents. Typical assisted care features, such as a common lobby, dining area, library, and activity rooms will be provided. The site will be staffed 24 hours a day, seven days per week by between 6 and 40 staff.

Proposed site improvements include new parking, perimeter and interior landscaping, and a new stormwater drainage system that includes detention and water quality components. In addition, off-site

curb, gutter, and sidewalk improvements are proposed for 1st Avenue NE. Proposed enhancements to the critical areas are described in this report.

Runoff from the parking area would be very limited. Detailed stormwater drainage plans and technical information report were submitted with the building applications. Aegis' revised report has been submitted with this application.

A critical area study and wetland mitigation plan and a habitat management plan were also submitted with this application.

## **2. Project Site**

### Legal Description of Subject Property

Lot B of Boundary Line Adjustment SHLA 2000-007:

That portion of Lot 5, Block 3, Green Lake Five Acre Tracts to the City of Seattle, according to the plat recorded in Volume 11 of Plats, Page 72 in King County Washington lying west of the westerly margin of Primary State Highway No. 1, as established by deeds recorded under recording No. 6040514; except the south 166 feet of said Lot 5; and except the west 10 feet of said portion of Lot 5 as conveyed to King County by deed recorded under Recording No. 2307200.

Together with that portion of Lot 4 of said Block 3, lying west of the westerly margin of Primary State Highway No. 1, as established by deeds recorded under recording No. 6040514 and 6062782; except the west 10 feet of said portion of Lot 4 as conveyed to King County by deed recorded under Recording No. 2307200.

Together with that portion of Lot 3 of said Block 3, more particularly described as follows:

Beginning at a point on the south line of said Lot 3 from which the southwest corner of said Lot 3 lies N 71°42'08" E for 174.81 feet to a point on the westerly margin of said Primary State Highway No. 1; thence S 23°19'09" E, along said westerly margin, for 66.82 feet to a point on the south line of said Lot 3 from which the point of beginning lies N 88°04'20" W for 192.53 feet to the point of beginning.

### Site Description

The applicant, Aegis Assisted Living, has stated that they wish to limit this application to the southern property, Parcel # 288170-0330 (Exhibit A). The subject property is 3.2 acres in area. Construction commenced after the Hearing Examiner denied an appeal on a zoning variance (see Procedural History) from stream and wetland buffers. All work has now stopped pending action on this application, and the property remains an exposed, yet protected, construction site. The previous owner of the property, Provail, housed Cerebral Palsy residents. All structures and impervious surface areas from the previous use were demolished as part of the recent construction.

The North Branch of Thornton Creek runs through the site in Peverly Pond at the extreme northern end of the property. Both the on-site wetland and stream are classified as Type II. This branch of the creek crosses diagonally under I-5 in two long culverts. Along Interstate-5's right-of-way, the banks are lined with grass. East of the subject property the creek travels through a concrete trough within the interstate right-of-way.

Habitat problems that have been identified are the concrete pipe under I-5, storm drains that discharge into the creek, poor streamside vegetation along I-5, the concrete trough Peverly Pond is impounded by a significant concrete structure rising approximately 5-7 feet above the concrete trough. Both the structure and trough are in the I-5 right-of-way and are controlled by the Washington State Department of Transportation. The impoundment structure at Peverly Pond is a significant barrier to upstream fish migration.

The concrete trough is buried under a blanket of silt and in many spots is no longer visible.

### **3. Neighborhood**

The subject property is located in the Parkwood Neighborhood adjacent to Interstate-5. Three churches lie directly south of the site, and a single family neighborhood south of the church properties. All of the property situated between 1st Avenue and the freeway is designated as either medium or high density residential in Shoreline's Comprehensive Plan.

Across 1st Avenue, west of the subject property, two sports fields are located within the boundaries of Twin Ponds Park. The ponds drain into a channel flanking a parking lot that serves the fields, through a culvert under the street, and into Peverly Pond. The pond discharges through a controlled concrete spillway and into the concrete lined stream described above. The stream flows alongside the freeway for approximately 800 feet, then under the freeway, re-emerging in Jackson Golf Course in the City of Seattle.

Single family homes are located south of the park. The area, west of 1st Avenue is designated as Low Density Residential. First Avenue NE provides primary access from both Parkwood and Ridgecrest Neighborhoods to the interstate on-ramp at NE 145th Street.

### **4. Zoning**

The subject property is zoned R-24 (Residential - 24 units per acres). This zone is primarily an urban residential zone which provides for a mix of predominantly apartment and townhouse dwelling units and other development types, with a variety of densities and sizes in locations appropriate for urban densities (SMC 18.04.110). Senior assisted housing is an outright permitted use in the R-24 Zone (SMC 18.08.030).

### **5. Comprehensive Plan**

#### Land Use Element:

The designated land use for the subject property is High Density Residential.

The High Density Residential designation is applied to areas near employment and commercial areas; where high levels of transit service are present or likely; and to areas currently zoned high density residential. This designation creates a transition from high intensity uses, including commercial uses, to lower intensity residential uses. All residential housing types would be permitted. The permitted base density for this designation will not exceed 48 dwelling units per acre unless a neighborhood plan, subarea plan, or special district overlay plan has been approved. Appropriate zoning designations for this area would be R-12, R-18, R-24, or R-48 Residential.

#### Housing Element:

The proposed development by Aegis complies with the following housing goal:

Goal H-IV: Encourage and support a variety of housing opportunities for those with special needs particularly relating to age, health or disability.

#### Parks, Open Space and Recreation Element:

Parklands include Special Use Areas. Special use areas are miscellaneous public recreation areas or lands occupied by a specialized facility. Some of the uses that fall into this classification include special purpose areas, waterfront parks, community gardens, single purpose sites used for field sports, or sites occupied by buildings.

The proposed development by Aegis complies with the following parks, open space, and recreation goals and policies:

Goal PR I: Enrich the quality of life for all Shoreline residents by ensuring that a broad range of high quality parks, recreation and cultural opportunities are readily available, by preserving open spaces and maintaining a quality parks and recreation system.

PR2: Preserve, protect and enhance areas (where practical) with critical or unique natural features -- such as stream corridors, wildlife habitats, shorelines and wetlands -- especially if endangered by development.

PR4: Look for opportunities to preserve and protect current open space.

Goal PR II: Seek increased opportunities for Shoreline citizens to enjoy parks, recreation, and cultural resources through improving accessibility and usability of existing facilities and pursue opportunities and partnerships for new indoor and outdoor facilities for year round programming.

PR17: Provide, where appropriate, educational exhibits, displays and information to educate visitors about natural habitats and unique features.

#### Environmental Element:

The proposed development by Aegis complies with the following environmental goals and policies:

Goal EN I: Through leadership, policy, and regulation, the City shall strive to minimize its impacts on the natural environment. The City shall lead and support efforts to protect and improve the natural environment, protect and preserve environmentally sensitive areas, and minimize pollution and the waste of energy and materials.

EN4: Support, promote, and lead public education and involvement programs to raise public awareness about environmental issues, advocate respect for the environment, encourage individual and community efforts to protect the environment, and provide opportunities for the community and visitors to respect and enjoy Shoreline's unique environmental features.

Goal EN III: Provide habitat of sufficient diversity and abundance to sustain existing indigenous fish and wildlife populations. Balance the conditional right of private property owners to develop and alter land with the protection of native vegetation.

Goal EN V: Manage the storm and surface water system through a combination of engineered solutions and the preservation of natural systems in order to provide for public safety, prevent property damage, protect water quality, preserve and enhance fish and wildlife habitat and critical areas, and maintain a hydrologic balance.

Goal EN VI: Preserve, protect, and, where practicable, restore wetlands, shorelines, surface water, and ground water for wildlife, appropriate human use, and the maintenance of hydrological and ecological processes.

## **6. Procedural History**

### Previous Actions

A zoning variance was applied for in May, 2000. The purpose was to vary the stream and wetland buffer widths in order to build. The variance was approved June 27, 2000. The administrative decision was subsequently appealed along with the SEPA threshold determination. The Hearing Examiner denied the appeal after an open-record hearing held October 12, 2000. A building permit was issued November 16, 2000. The Examiner's decision was then appealed to Superior Court. On October 1, 2001 The Court remanded it back to the Hearing Examiner for further consideration. On some variance criteria and two additional areas of consideration in the MDNS. This hearing occurred January 9 and 10, 2002. The Hearing Examiner upheld the appeal of the variance, but denied the appeal of the SEPA determination. Aegis withdrew the zoning variance February 19, 2002.

All construction stopped on the site October 1, 2001 when Superior Court issued a stay pending remand of the variance and has not restarted since the variance was withdrawn. Aegis has continued to maintain a caretaker's residence at the site for security purposes.

### Pre-Application Meeting

A pre-application meeting were held between City staff and the applicant August 3, 2001.

### Neighborhood Meeting

A neighborhood meeting was held August 23, 2001 at Shoreline Center, as specified in SMC 20.30.090. the report submitted by the applicant is Exhibit B.

### Application Submittal

The application for this special use permit was submitted to the City on September 10, 2001, and scheduled for hearing after the MDNS for the project was approved by the Hearing Examiner in January 25, 2002 (Exhibit C).

### Notice of Application

A Notice of Application and Public Hearing was mailed to owners of all properties within 500 feet of the subject site, posted in the Seattle Times and Shoreline Enterprise, and posted at the site on July 4, 2002 (Exhibit D).

### Public Comment Period

The written public comment period ended at 5:00 p.m. July 19, 2002.

## **B. SUMMARY OF APPLICABLE CODES AND REGULATIONS**

### **1. Shoreline Municipal Code (SMC)**

Critical area special use permits (CASUP) are Type C Actions and subject to Title 20 of the Shoreline Municipal Code, commonly known as the Development Code. Chapter 20.30 specifies procedures for land use actions. The chapter identifies the decision-making authority for CASUP's as the City Council (20.30.060) and requires an open record public hearing to be conducted by the Hearing Examiner.

Application requirements are as follows: (20.80.100)

1. All applicants are encouraged to meet with the City prior to submitting an application subject to this chapter. The purpose of this meeting shall be to discuss the City's critical area requirements, processes and procedures; to review any conceptual site plans prepared by the applicant; to identify potential impacts to critical areas and appropriate mitigation measures; and to generally inform the applicant of any Federal or State regulations applicable to the subject site. Such conference shall be for the convenience of the applicant and any recommendations shall not be binding on the applicant or the City.
2. A Critical Areas Checklist is required as part of the submittal package. The purpose of the critical areas checklist is to allow the Department to review applications to determine if critical area review is warranted or required. Applicants shall complete the critical areas checklist prior to any pre-application conference with the Department (Exhibit E).
3. A critical area report must be submitted to the City for review, if applicable. The purpose of the report is to determine the extent, characteristics, and functions of any critical areas located on or in close proximity to a site where regulated activities are proposed. The report will also be used by the City to assist in the determination of the appropriate critical area rating and establishment of appropriate buffer requirements in accordance with the appropriate critical area district overlay (Exhibit F).
4. Required reports and studies shall include all applicable information for each critical area. (see SMC 20.30.100).



5. All required reports and studies shall be prepared by a qualified consultant acceptable to the City. The City may, at its discretion and at the applicant's expense, retain a qualified consultant to review and confirm the applicant's reports, studies, and plans.

Relationship to other regulations are as follows: (20.80.110)

1. The critical area regulations shall apply as an overlay and in addition to zoning, land use and other regulations established by the City of Shoreline. In the event of any conflict between these regulations and any other regulations of the City, the regulations which provide greater protection to the environmentally critical areas shall apply.
2. Areas characterized by particular critical areas may also be subject to other regulations established by this chapter due to the overlap or multiple functions of some critical areas. Wetlands, for example, may be defined and regulated according to the provisions for fish and wildlife habitat conservation areas, as well as provisions regulating wetlands. In the event of any conflict between regulations for particular critical areas, the regulations which provide greater protection to environmentally critical areas shall apply.

Duty to provide housing accommodation: (20.40.110 H)

1. The Director is authorized to make reasonable accommodations to provisions of the code that apply to dwellings occupied or to be occupied by disabled persons as defined by the Federal Fair Housing Act and Fair Housing Act Amendments, when such reasonable accommodations may be necessary in order to comply with such acts. All such accommodations shall be personal to the applicant and shall expire immediately if the disabled applicant terminates occupancy at the subject site.

## **2. State Environmental Policy Act (SEPA)**

A Mitigated Determination of Non-Significance (MDNS) was issued June 27, 2000, in accordance with WAC 197-11-350. As stated in the section discussing previous actions, the appeal of the remanded MDNS was denied by the Hearing Examiner January 25, 2002. The applicant submitted an update to the SEPA checklist. The update did not reveal any new information that warranted a new threshold determination or addendum (Exhibit G).

## **C. ANALYSIS OF DECISION CRITERIA**

If the application of the critical area chapter would prohibit a development proposal a critical area special use permit may be granted. The Hearing Examiner shall review the application and conduct a public hearing. The responses to decision criteria from Aegis is Exhibit H. The Hearing Examiner shall make a recommendation to the City Council based on the following criteria (SMC 20.80.090):

1. *That the proposed special use is in the public benefit.*

Comprehensive Plan Goal H-IV states that the City "encourage and support a variety of housing opportunities for those with special needs particularly relating to age, health or disability". Shoreline's Comprehensive Plan identifies the City as having an aging and increasingly diverse population. Over 14% of the total population is over the age of 65. Approximately 8% of local residents are considered disabled. These demographics indicate a significant demand for housing options for special needs populations within the City of Shoreline.

Aegis assisted living facilities provide housing and health care to disabled senior residents. This use provides a public benefit to Shoreline and meets Comprehensive Plan Goal H-IV.

2. *There are no other practical alternatives to the proposed development which would cause less impact on the critical area.*

Aegis solicited individuals and companies that provide assisted living and health care to submit letters describing the industry's needs in order to operate. Three letters were received that specify industry standards. Three stories is the absolute maximum height for the building to be viable. Disabled residents have difficulty accessing various floors safely. Higher buildings are also much harder to evacuate in an emergency. The minimum number of residents that enable a facility to provide full services is 100. Enclosed courtyards are essential to providing a secure environment and sense of safety. The applicant has demonstrated that no other alternatives to the proposed development which would cause less impact on the critical area are practical.(Exhibit I).

3. *The proposal minimizes the impact on identified critical areas based on the implementation of adaptive management plans.*

The buffer enhancement plans, prepared by Talasaea Consultants, were sent to The Watershed Company for their peer review (Exhibit J). Watershed also received landscaping and civil plans. Their report of April 5, 2002 indicated no objections to the plans if 27 recommended revisions were implemented. The applicant revised their plans to comply with the recommendations and submitted the revisions on May 9, 2002. The peer review was the second performed for this project. Sheldon & Associates also provided a report on October 27, 2000. Aegis has employed two qualified biologists, Wetland Resources and Talasaea. Four separate companies have prepared, reviewed, and modified the applicant's buffer enhancement plans. All these experts have indicated the adverse impact to the critical areas will be minimal if the enhancement plan is implemented.

4. *This special use permit process shall not allow the use of the following critical areas for regional retention/deintion facilities except where the Hearing Examiner makes a finding that the facility is necessary to protect public health and safety or repair damaged natural resources:*

- a. *Type I streams or buffers;*

Does not apply.

- b. *Type I wetlands or buffers with plant associations of infrequent occurrence;*

Does not apply.

- c. *Type I or II wetlands or buffers which provide critical or outstanding habitat for herons, raptors or State or Federal designated endangered or threatened species unless clearly demonstrated by the applicant, using best available science, that there will be no impact on such habitat.*

The applicant does not propose a regional retention/detention facility. On-site stormwater detention is only provided for Aegis (Exhibit K).

### III. RECOMMENDATIONS

Based on the application, site plan, and regulation criteria, Planning and Development Services Department recommends that the Hearing Examiner find that all criteria have been satisfied and recommend that Aegis special use permit be approved with conditions:

1. Compliance with all MDNS mitigation measures.
2. Compliance with all recommendations of The Watershed Company.

Respectfully submitted this date, July 18, 2002.

---

Paul MacCready  
Planner

**Exhibits**

EXHIBIT A: Site plan, showing proposed development

EXHIBIT B: Application Form and Affidavit

EXHIBIT C: Neighborhood Meeting Report

EXHIBIT D: Notice of Application

EXHIBIT E: Critical Areas Worksheet

EXHIBIT F: Critical area Study & Wetland Mitigation Plan, Wetland Resources

EXHIBIT G: Mitigated Determination of Non-Significance (MDNS), SEPA Environmental Checklist, SEPA Checklist Update

EXHIBIT H: Responses to Critical Area Special Use Permit criteria

EXHIBIT I: Letters from Other Parties in Assisted Care Industry

EXHIBIT J: Talasaea Consultants Buffer Enhancement & Landscaping Plans, Habitat Management Plan; The Watershed Company's Peer Review Reports

EXHIBIT K: DCI Engineers Technical Information Report, Civil Plan

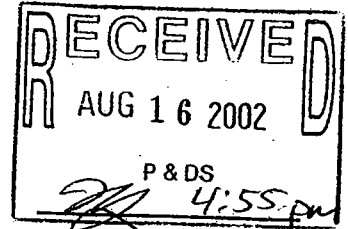
EXHIBIT L: Public Comment Letters

Daniel A. Mann  
17920 Stone Avenue North  
Shoreline, WA 98133

July 22, 2002

Attention: EIS Hearing Examiners

Shoreline Planning Commission  
17544 Midvale Avenue North  
Shoreline, WA 98133



To Whom It May Concern:

59-1

I am writing to object in the most strenuous terms to Alternatives "A" and "B" in the Aurora Corridor EIS and the process by which they were developed.

59-2

My objections start with the fact that the Citizens Advisory Task Force was not representative of the Aurora businesses nor of the most impacted neighborhoods. There were only two Aurora Avenue merchants on the task force, instead of the five originally agreed to by the council. There was no representation from Meridian Park, one of the most highly impacted of the residential neighborhoods despite the application of several of its residents.

The Citizens Advisory Task Force was chaired by someone who stands to make *millions of dollars* on the basis of this plan raising the value of his real estate holdings. This was a clear conflict of interest that should have disqualified him from participation, let alone leadership. Additionally, there are few records, if any, of the alleged meetings and only one record of any voting - and that record is disputed by two of the participants.

59-3

I also object to plan design features that waste precious commercial Aurora corridor real estate and make doing business more difficulty in an already difficult business environment. The 12-foot sidewalks are an extravagant waste of limited commercial frontage for an already built-out urban

59-3 | commercial corridor. In many instances, those sidewalks will take most or all  
CONT. | of small business parking - making the land commercially useless.

59-4 | The continuous raised center medians will reduce access for customers and  
cause many of them to simply drive by without stopping. We (Aurora  
Corridor Merchants) have seen no proof from WSDOT that focused mid-  
block U-turns are safer than mid-block left turns. Common sense tells me  
that a U-turn across three lanes of traffic is more dangerous than a left  
turn. Furthermore, the medians are a huge impediment to freight mobility  
59-5 | on this commercial corridor. Large trucks and semi-trucks are unable to  
make U-turns in the space available within the median, and will be compelled  
to access their customers by traveling through adjacent residential  
59-6 | neighborhoods. Emergency vehicles will also be impeded by the medians.

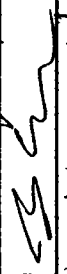

59-7 | The alternative plan for Aurora created by the Shoreline Merchant's  
Association will solve the traffic problems at less than one-third the cost  
without destroying businesses, jobs and tax flow. It increases capacity with  
less stoppages than the city's plan, and provides greater emphasis on  
pedestrian safety. It's a sensible alternative that meets the traffic, safety,  
and economic needs of the community.

Sincerely,

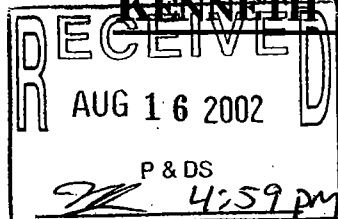


Daniel A. Mann  
Aurora Business Owner and  
Meridian Park Resident

We, the undersigned, support the plan for the Aurora Corridor as designed by Shoreline Merchants Association and Concerned Citizens For Shoreline. and The comments expressed in David/Manus letter

Name	George A. Daler	Position	Owner	Business	City Vancouver
Signature		Address	20001 Aurora Ave N.	Phone	206-542-3066
Name	BriLee Noffsinger	Position	owner, mng.	Business	206 365 0220
Signature		Address	14731 Aurora Ave N	Phone	CarePlus Medical Center
Name		Position		Business	
Signature		Address		Phone	
Name		Position		Business	
Signature		Address		Phone	
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This commentary is submitted for consideration in the Environmental Impact process for the initial segment of the Highway 99 Project in Shoreline, Washington.

In the 70's, I traveled from Ballard to Boeing Renton on Highways 520 and 405 at any speed that I thought I could get away with. Seattle was still a pretty sleepy town, and perhaps the current plans being advocated for Highway 99 through Shoreline would have been appropriate then. However, those days are gone, likely forever; and so is the acceptability of any community's or neighborhood's plans for hijacking a regional resource for their own selfish pleasure, particularly when it places such huge demands on the state's limited transportation resources. Even the potential for federal grants, which may erroneously be considered to be "free money" is limited and must be directed into the most efficacious possible projects.

Due to the physical geography that makes Seattle such a great place to live, and to the lack of foresight and/or political chicanery of our governments in the past, there are only TWO major arteries that traverse the Puget Sound metropolitan area from North to South. Highway 99 is one of them, which probably handles one-third of the commuting travel on a daily basis, and perhaps 80 percent on those frequent occasions when highway I-5 is at a standstill, resulting from an accident, a sporting event, a holiday exodus, or other source of congestion. Consequently, ALL of the communities that Highway 99 traverses must do their utmost to ensure that the traffic-carrying capacity of this road is maximized, and is not compromised by chauvinistic motivations. It is nothing more than their civic duty to do so.

There are three main parameters that determine a road's capacity to move traffic: the rate of flow (speed), the simultaneous capacity (number of lanes) and the degree of overhead (traffic lights). NOTHING in the plans for changes to the highway should mitigate any of these factors. In fact, they should be enhanced. The 20 year target for this road must not be in the model of a suburban boulevard, which it is not, even today; but should be directed toward a limited access highway in which major intersections and pedestrian crossings are implemented as underpasses and speeds are increased, perhaps to the 55 mph range.

60-1 Of course, at that point, the two-way left hand turn lane would have to be history, and businesses would have to be restructured in a major way. Perhaps that would be accomplished by developing the frontage (or perhaps "backage" would be more descriptive) roadways that pass behind the businesses today, and reversing the front and back of all of the business buildings. In any event, nothing must be done today that would impede the evolution of the road from a 7-lane, very efficient road with no lane restrictions and a speed limit that will still accommodate the continuous turn lanes, to an underpassed highway that demonstrates the same flow characteristics that are now present from 74th Street south through Woodland Park, to downtown Seattle, where the East-West crossings are all underpassed, and traffic moves typically at 55 MPH, limited only by congestion factors, regardless of what the signs may say.

Removal of the continuous left hand turn lanes will be a huge mistake having many unpleasant ramifications. Comparison to the highway section through SeaTac, for

instance, is not appropriate, as this stretch is bordered primarily by a relatively small number of large hotels, which do not generate the same amount of crossing traffic at every one hundred foot interval.

60-2 At present, making a left turn across traffic requires only a 90 degree turn, during which one is facing the potentially conflicting traffic at all times, and crossing two or three lanes. If turns are to be made only from infrequent "pockets", one will then have to cross the two or three adjacent lanes while facing AWAY from the oncoming traffic and will then have to make a U-turn out of the pocket. By recent experiment, my Chevy Lumina requires the width of three lanes, in addition to the "pocket lane" to make a 180 degree turn, so I am now forced to traverse another three lanes of oncoming traffic, again while facing away from that traffic during most of the maneuver. Moreover, the two-way lane usually provides an acceleration ramp for merging with the traffic in the intended direction of travel, while the 180 turn from the pocket to that direction must be made at close to zero velocity, increasing the exposure greatly.

60-4 I shudder to think about how these turning maneuvers will be conducted by people driving grossly oversized vehicles, such as Expeditions and Explorers, especially when they are driven by the folks who frequently have no business doing so, but who are only interested in improving their own unwarranted feelings of safety or macho image at the expense of people driving cars that are more friendly to the environment and our country's degree of energy independence. Trucks will not make these turns at all, and the inevitable upshot, as so many have warned to apparently deaf ears, is increased traffic through the neighborhoods. In the last several years, there have been at least four accidents here at the corner of North 143rd and Roslyn, due to folks rushing through neighborhoods, perhaps to avoid congestion on 145th Street.

60-5 Pockets of limited length are really nasty things. If they are not long enough to hold all of the traffic that wishes to turn, the trailing vehicles will block the inside lane, which under the plans preferred by Shoreline, would reduce the through traffic lanes to a SINGLE one. This situation is also very hazardous to the vehicles stopped in the roadway. Also, as it often occurs today, one may be in the inside lane at a traffic light be unable to enter a pocket of limited length, so that one may be trapped for two or even more traffic cycles before one just reaches the pocket, in which one may well be trapped for an additional cycles. Again, the expedient alternative is a free right turn and reverse course through the neighborhoods.

60-6 It is unconscionable that the present analysis, despite its egregious expense, does not include ANY analytical process to quantitatively address the traffic flow conditions that will prevail under the new conditions. A COMPREHENSIVE ANALYTIC TRAFFIC SIMULATION USING STATE OF THE ART COMPUTER TOOLS IS A MANDATORY ADDITION TO THIS SORRY EXCUSE FOR A DRAFT EIS, WHICH MUST REALLY STAND FOR DISINGENOUS, SPECIOUS WHITEWASH, perhaps in some foreign tongue or arcane lexicon.

60-7 What will be the effect of consolidating much of the left turn traffic at signalized intersections? It has been observed on one Saturday morning that 120 cars per hour used the two-way left turn lanes in a very small segment of the highway. Certainly, the signal cycle would have to be lengthened to accommodate the increased traffic, and it is even more likely that pocket capacity would be exceeded, thus restricting the flow of through traffic.



Moreover, the increased traffic at intersections will force the extension of the signal cycles, further reducing the capacity of the road.

This is a VERY bad idea, and elimination of the two-way lanes has already been wisely rejected by Lynnwood and apparently, Everett and Edmonds as well.

60-8 | Although the idea of reserving lanes for transit traffic is appealing, it is much too wasteful of the precious resource that would comprise fully ONE-THIRD (two lanes out of six) of the carrying capacity of the road. If the 358 bus runs nominally at 10 minute intervals and averages 25 mph over its route, this means that the busses are roughly 4 miles apart. To leave 4 miles of roadway reserved but unused is the most inane idea imaginable.

60-9 | Rationalization of its use as a merging lane is also specious, particularly since the significant percentage of clueless drivers do not use acceleration lanes, especially when they are marked for transit use, and will wait until they can enter the through lanes, having to cross the transit lane in the process.

60-10 | Doubling the number of traffic signals is similarly counterproductive. Since lights cannot be synchronized simultaneously for two directions of traffic flow, much less all four directions, the amount of wasted time and concomitant pollution will increase with each additional signal.

Do the detailed traffic analysis, rely on reason, and fulfill your obligations to the entire Puget Sound region, which has relieved you of the need to deal with many problems inherent in urban areas, from the social to the utility infrastructure. Making a road that will carry people to and from the city in the most expedient manner possible is the least that the residents of Shoreline can do in return.

P.S. Reduction of the speed limit on Highway 99 to the equivalent that is present on streets such as Meridian Avenue, which have much more claim to being "suburban boulevards" than 99 does, is patently absurd. It will not be respected by the traffic, which "seeks its own level" and will simply become more resentful of Shoreline if traffic tickets are issued wholesale.

210 | WE NEED MORE TIME FOR COMMENT BETWEEN THE PRESENTATION OF THE DEK AND CUT-OFF.

**SR 99 North Aurora Avenue Multimodal Corridor Project  
N, 145<sup>th</sup> Street to N. 165<sup>th</sup> Street  
Environmental Assessment and Draft EIS Statement**

**Comment and Critique:** Submitted by Clark Elster 1720 NE 177, Shoreline, WA 98155

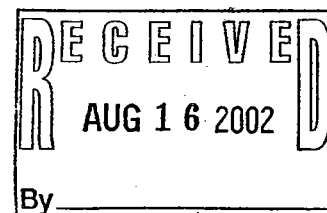
8/15/02

**GENERAL COMMENTS:** Heretofore, All of the published studies (multimodal Pre-design Study) and public discussions about this project have encompassed the entire three-mile corridor. It was understood from the beginning that the EIS would encompass the entire corridor as a whole because some impacts carry over from one segment to another — but that actual construction would probably be accomplished in three phases starting at N 145<sup>th</sup> Street. Assurances were given at the Federal and State level that the EIS would have to encompass the entire three-mile Aurora Corridor. Now, if the EIS is allowed to be segmented without identifying and considering the cumulative impacts of the corridor project as a whole, the spirit of the EIS process will be subverted — contrary to the policies and provision of Shoreline's Comprehensive Plan and the State Growth Management Act. Under these circumstances, the Aurora Avenue North Multimodal Corridor Project Draft EIS is incomplete and therefore should be rejected.

Only four alternatives were crafted and considered early in a public planning process weighted to favor what eventually was selected to become the desired Alternative A (the most expensive of the three alternatives considered in this draft EIS). The two most immediate and cost effective and safest alternatives that the City could have under taken were not seriously considered during public meetings nor in this Draft EIS. They were 1) Lower the speed limit to 35mph to conform to current State DOT highway design standards for Class IV highways such as Aurora, and 2) Install street lighting the length of the corridor). A subsequent proposal submitted by the *Shoreline Merchants Association* and *Concerned Citizens for Shoreline* that provided for roadway improvements, pedestrian safety and a modest beautification program all within the existing highway right-of-way, was rejected and never given a fair evaluation.

The traffic volume and accident data reported in this Draft EIS is based on misrepresented, incomplete and out of date data compiled by WSDOT. The data has been manipulated and generalized by the City of Shoreline Planning Dept. and its consultants to justify the project (by means bordering upon deception) and to discredit any other proposals submitted for consideration. Manipulated and misrepresented data is used in the Draft EIS to support the desired outcome promoted by the City from since its inception, i.e. Alternative A, which essentially is a \$28 million per mile beautification/urban renewal project.

By their own figures, The City's Preferred Alternative does not improve the level of Service (LOS) at key intersections, does not significantly improve traffic mobility, safety nor capacity, and does not realistically address the needless adverse economic impacts inflicted on Highway 99 Businesses. The Draft EIS fails to make any good faith effort to evaluate other alternatives that should have been included during the scoping process and in this DEIS. It over states the benefits and, if at all, under states or ignores the adverse impacts. This EIS process has been flawed from its inception and therefore should be rejected.



**FACT SHEET: page v.**

- 61-7 **Title:** Improperly limits project description and consideration to the Aurora Corridor between North 145<sup>th</sup> to North 165<sup>th</sup> Streets instead of to North 205<sup>th</sup> Street as described in all other previous public hearings and comments.
- 61-8 **Description of Proposal and Alternatives:** (page v): Omitted is mention of actions taken to abate or adversely alter business structures and business parking access and parking spaces and installation of a major stormwater run-off system to drain into either one of two salmonoid streams.
- 61-9 **Alternative A:** Description fails to disclose the increased width of raised median and fails to state as such — the cumulative 12' width of sidewalk and amenity zone/curb which totals 24' which with wider median will require expanding the highway right-of-way from 90' to 110'. Description also fails to state project will result in some property abatement or condemnation. Cost estimate is omitted.
- Alternative B:** fails to disclose the increased width of raised median and fails to state as such — the cumulative 7' width of sidewalk (14') which will require some expanded highway right-of-way and fails to state project will result in some property abatement or condemnation. Cost estimate is omitted.
- 61-10 **Alternative C** is not mentioned nor described
- 61-11 **Location of site** (page vi): Statement excludes impacts on neighborhoods on either side of the project which will be impacted by heavier traffic seeking to avoid the construction and freight traffic seeking alternate access to businesses cut off construction. Impacts will extend past 50' on either side of Aurora.
- 61-12 **DESCRIPTION OF PROPOSED ACTION:** page xvii: The Draft EIS improperly segments the project into three separate phases rather than describe the cumulative environmental and economic impacts of the entire project upon the community and the impacts of each phase upon each of the other phases. **COMMENT:** No explanation is given as to making North 165 the logical terminus. For the first phase of this project, What is the logic of ending up at a newly signalized intersection that will dump heavy volumes of traffic into onto a narrow road in a very quiet neighborhood?
- 61-13
- 61-14 Description fails to mention increasing the width of roadway by taking business frontage property and some structures. Fails to mention required construction of a major stormwater basin/drainage system that will dump stormwater either into Boeing Creek (a protected salmonoid habitat), or Thorton Creek (also a salmonoid habitat).
- 61-15 **Summary Descriptions of Alternatives Considered:** page xvii: Description fails to state total outside to outside width dimensions of roadway/sidewalk. It fails to state that the existing 90' State Route Highway 99 roadway right-of-way width will be increased by as much as 10' — 20' which will require property acquisition/condemnation and the destruction of some business structures and business parking and access. **COMMENT:** Readers are not readily made aware of this fact. No cost estimates are given. This factor alone has enormous adverse impacts and consequences that demand full public disclosure and debate.
- COMMENT:** In each alternative described, the size and location of what has to be a critical major stormwater facility and the route of stormwater escapement drainage is omitted (Boeing Creek or Thorton Creek?).
- 61-16 **Line 10:** "and eastbound N. 155 Street." Should be corrected for clarity to read — "and eastbound on N. 155 Street at Aurora Ave N from West Minister Way." The added right turn lane at North 155<sup>th</sup> is omitted.
- 61-17 **Description of Other Major Actions:** page xviii, lists two adjacent or concurrent projects (Interurban Trail and the Pedestrian Safety Demonstration Project and fails to list a third project (City Center Sub Area Plan and related street improvements on North 175<sup>th</sup> for the Top Foods project).

**Description of Other Major Actions: page xviii (continued),**

61-18 **Line 3: page xviii, incorrectly identifies** the Interurban trail project as extending from North 165<sup>th</sup> to North 205<sup>th</sup> when it actually extends from North 145<sup>th</sup> to North 205<sup>th</sup>. Inconsistent when later it identifies the trail as beginning at North 145<sup>th</sup>. **COMMENT:** The Interurban trail is misrepresented as an important enhancement of the regional transportation system (Line 5) with no supporting data or empirical evidence to justify that statement. The trail is recreational and will have virtually no beneficial impact on moving traffic or significant numbers of pedestrians through Shoreline.

61-19 **Line 21' (page xviii) incorrectly implies** that two demonstration Pedestrian Safety Projects on Aurora Ave just north of North 160<sup>th</sup> Street have not as yet been started pending a separate DEIS process, when in fact construction is nearly completed before any DEIS has been prepared and subjected to public scrutiny. **COMMENT:** This demonstration project is meaningless because 1) there are virtually no pedestrians on Aurora, and 2) the roadway configuration employed is for only four lanes plus a widened median and makes no allowances for BAT lanes for busses. Curiously, these X-walks are causing increased traffic congestion. It is difficult to understand any pertinent relationship for demonstration purposes to the Aurora Corridor Project.

**Impacts Identified In This Document: page xviii:** Generalized description of negative impacts are understated and benefits are overstated.

61-20 **Transportation: (page xviii):** Statement unrealistically understates traffic impacts on Aurora at either end of the construction zone and upon adjacent residential neighborhoods. There will be major impacts from by-pass traffic seeking a way around Aurora on Meridian Ave North to the east and Dayton Avenue North to the west. These major adverse impacts should be anticipated and clearly stated in the DEIS. Expect major congestion on Aurora at North 145<sup>th</sup> and at North 175<sup>th</sup>.

**Line 5 (page xviii):** The assertion "that under either alternative, traffic operations would be substantially better with implementation of the project" is an exaggeration not born out by the City's DEIS traffic data and certainly not born out by WSDOT traffic accident data. Negative impacts are understated and benefits are overstated.

**Line 1 (page xix):** The assertion that the build alternative would result in less traffic diverting into neighborhoods than would be expected under No Action Alternative" is false. **COMMENT:** Both Alternative A and B propose to create additional signalized intersections providing new readily accessible access points into neighborhoods, which will facilitate introduction of additional traffic into the neighborhoods. These new intersections will encourage "by-pass" traffic escaping congestion on Aurora. These new intersections will also facilitate "around the block" truck traffic seeking alternate access routes to businesses once the two-way left turn center median is eliminated and freight mobility is reduced.

61-21 **Line 2 (page xix):** The assertion in terms of safety that the build alternatives would provide the most benefit and the no build the least is misleading and inaccurate. **COMMENT:** The traffic accident data provided by WSDOT and used to promote both Alternatives A and B is incomplete, out of date and was in some cases misrepresented to overstate the benefits of A and B, and inflated to understate the lack of benefits for the No Build Alternative. WSDOT traffic accident data clearly refutes the often-heard assertion that this stretch of Aurora is one of the most dangerous high accident corridors in the State when in fact, the opposite is true. The Aurora Corridor in Shoreline is not even listed on the WSDOT list of the 70 High Accident Corridors in the State.

61-22 **Land Use: Line 1** (page xix): The statement that "the project would require acquisition of minor amounts of property consisting of a narrow strips of land along Aurora and would largely be beneficial to the existing commercial land uses" is not true. **COMMENT:** Nearly 90% of the businesses (many Korean owned) have objected with petitions because in almost every case, they were not consulted and their businesses will loose nearly all of their customer parking space and customer and freight vehicular access will be made more difficult.

61-23 **Line 3** (page xix): The statement, that the project "would largely be beneficial to the existing commercial land uses by providing greater vehicular, transit and pedestrian access to existing commercial land uses and enabling commercial redevelopment along the corridor." is an overstatement and not true. **COMMENT:** 1) By the City's own estimate, traffic volumes will not be significantly increased and congestion improved. 2) There is only one sparsely utilized "local" transit route that traverses the length of Shoreline on Aurora —#358. All other busses use only a short stretch of Aurora between North 175<sup>th</sup> and 185<sup>th</sup> and 192<sup>nd</sup> to reach I-5, so transit access to businesses will not increase or be improved in this first segment of construction. 3) The BAT lanes will not noticeably improve bus movement through Shoreline, as the buses now running through the city are not impeded in any way by competing traffic. Furthermore, Metro Transit has no plans to increase the number of trips on this stretch of Aurora. 4) Pedestrian traffic in this auto-oriented district is very sparse and not likely to increase. **COMMENT:** At best, the reference to redevelopment reveals the underlying goal of the project proponents, long suspected to be "urban renewal." From the very beginning at the City's inception, the stated goal has repeatedly been to clean up Aurora (code word for getting rid of all of the junky businesses and the auto-oriented businesses). All attempts by the businesses represented by the Shoreline Merchants Association to work with the City to develop a workable street (SR99) improvement and beautification plan to resolve these issues have been rebuffed and input by businesses have been ignored.

61-24 **Line 8** (page xix): The statement that "both build alternatives would support many of the City's policies to enhance Aurora Avenue North as an attractive and thriving business and retail area" whereas "the no build alternative would not," exposes the City's disconnect with economic reality. **COMMENT:** This City attitude marginalizes the many successful small businesses that have existed along Aurora Avenue North for many generations and pay a very large percentage of the City's total retail tax base. The City's expectation that "if they build it, they will come" does not recognize the economic realities of trying to attract the types of businesses that they envision. To expect bigger or flashier businesses to locate themselves smack between the long established and huge retail/business centers located in North Seattle (Northgate Mall) and in Lynnwood (Alderwood Mall) is unrealistic. And the many intensely developed medium sized business centers scattered all around Shoreline from Edmonds, Lynnwood, Montlake Terrace, Lake Forest Park to north Seattle along Aurora Avenue and Lake City are a strong competitive economic deterrent to attempt new commercial development. Further militating against such expectations is the lack of "large footprint" properties conducive to expensive redevelopment. The properties on Aurora in much of the corridor, are long shallow strips of land that realistically can be used only for small commercial enterprises. To make the Corridor attractive to major development the City would have to try to rezone the adjacent residential neighborhoods on either side of Aurora Avenue for commercial/industrial development (as was tried once before during Shoreline's early Comprehensive Plan planning and zoning process). The City has not tried to provide incentives and regulatory authority to help businesses spruce themselves up. Why not?

61-26A **Social: Line 8** (page xix) This declaration of no Social impacts is not correct. **COMMENT:** Diverted "cut through" or "by pass" traffic into surrounding neighborhoods will have a great adverse impact on residents. Much of the immediate neighborhoods to the east of Aurora are composed of middle income and low-income owner occupied homes. Many of the businesses between North 145<sup>th</sup> and North 165<sup>th</sup> are minority owned (most of whom, have objected to the project's adverse impacts on their businesses. Many of these businesses, including outpatient health care services which cater to the Shoreline' and North Seattle minority community will loose much of their limited parking space and access will be made more difficult.

61-27 **Recreation:** (page xix) This section inconsistently describes recreational facilities/amenities along the full length of the Aurora Corridor from North 145<sup>th</sup> to North 205<sup>th</sup> as it should rather than confine the DEIS to just from North 145<sup>th</sup> to North 165<sup>th</sup>. **COMMENT:** The City can not have it both ways. The City can not ignore the exported stormwater management impacts on possibly two parks in Shoreline (Twin Ponds Park and Shoreview Park) and one in Seattle (Greenlake Park), and the Thorton Creek wetland project at nearby Evergreen School

61-31 **Regional and Community Growth:** (page xix): To assert that none of the alternatives will strongly affect growth trends and patterns in the City is on its face ludicrous if not deceitful. COMMENT: The whole underlying purpose of this project is to make the Aurora Corridor more attractive to commercial and business development, and more high density housing all of which is intended to promote growth. In keeping with the City's often stated mantra — "The Growth Management Act requires Shoreline to accommodate denser population growth (with in-fill development and more multifamily housing development) the City has aggressively pursued housing development opportunities. The Aurora Corridor is the most likely place where more dense multifamily housing will eventually be located.

61-32 **Services:** (page xx): This assertion incorrectly overstates congestion if no action is taken and minimizes congestion if either Alternative A or B are selected. All options will be nearly equal in congestion. Access to public services will be the same regardless of which option is selected. COMMENT: Just as it affects freight mobility, if a raised median is installed the length of Aurora, Avenue, fire responses will be slowed and hindered. The fire apparatus will not be readily able to make mid block left turns to cross over the median to reach fires on the opposite side of the highway or to get around stalled congested traffic. "Left turn/U-turn" median pockets notwithstanding, large fire trucks will not be able to make U-turns to readily reverse their direction of travel to reach their destination. This will be especially true in any traffic congestion situation. (Ask the firemen in the truck — not the "Brass").

61-33 **Environmental Justice:** (page xx): This statement is incorrect and ignores the high and adverse impacts on a large number of minority businesses. COMMENT: Nearly all of the large group of minority business owners and property owners along Aurora Avenue have repeatedly complained and submitted petitions to be heard and their concerns be addressed — to no avail. The City even falsely attested in previous documents to Federal and State authorities in seeking to be excused from having to prepare a DEIS, that the City had contacted and had near unanimous agreement from all of the businesses, on the details of this project when the opposite was true.

61-34 **Economics:** (page xx): This assertion of minimal impacts with mitigation, grossly ignores the impact of waste-water management. It understates the high impact on businesses and discounts the diminished loss of retail sales taxes. To call these impacts short termed and not substantial is incorrect. COMMENT: Aside from the access impediments caused by construction, this plan calls for expanding the highway right-of-way to take away land from businesses currently used for customer parking and access. Contrary to City assurances, much of this parking is not replaceable. This plan also calls for removal of some store fronts from buildings that will abut or overlap the new expanded right-of-way property line. In many cases, rebuilding/remodeling will not be an option.

61-37 **Line 4:** (page xx): To suggest that project workmen will spend some of their money in these businesses to partially mitigate some of their loss of regular business is absurd. (Who thinks this stuff up?)

61-38 **Line 10:** (page xx): The loss of retail taxes resulting from this project is incorrectly ignored, which skews any assessment of economic impacts. COMMENT: Actual (current) retail taxes collected in the project area, projected retail taxes collected during the duration of the project and projected taxes collected after completion need to be included in this DEIS. This information needs inclusion in the DEIS in order to make a reasonable assessment of the impact of lost retail taxes to the City. COMMENT: An accounting of what percentage of Shoreline's retail tax revenue base is derived from Aurora merchants must be made.

61-39 **Line 11:** (page xx): To suggest that the "local and regional economy will benefit from the operation of the project as mobility and safety are improved" is a misleading statement that can not be supported by data. COMMENT: The traffic accident data provided by WSDOT and used to promote both Alternatives A and B is incomplete, out of date and is misrepresented in this DEIS to overstate the benefits of A and B, and inflated to understate the lack of benefits for the No Build Alternative. WSDOT traffic accident data clearly refutes the often-heard assertion that this stretch of Aurora is one of the most dangerous high accident corridors in the State when in fact, the opposite is true. The Aurora Corridor in Shoreline is not even listed on the WSDOT list of the 70 High Accident Corridors in the State. Incidents of traffic accidents on Aurora are on the decrease.

61-41 **Economics: Line 13:** (page xxi): The assertion that "businesses that rely on the movement of goods and services along the corridor would experience reduced travel time and reduced transportation costs" as compared with "No Action" is false, Freight mobility to serve businesses on Aurora will be severely impacted by the installation of raised medians and the removal of the center two-way turn lane which is required for ready truck access to many businesses with no other means of ready truck access. **COMMENT:** Left turn/U-turn" median pockets not withstanding, large trucks will not be able to readily make U-turns to readily reverse their direction of travel to reach their destinations. **COMMENT:** Parcel package delivery services will be hindered and slowed and will resort to seek "around the block" alternate access routes to businesses once the two-way left turn center median is eliminated and freight mobility is reduced. **COMMENT:** A delegation of Aurora merchants recently testified before the legislature about the adverse impacts on businesses caused by WSDOT insistence to needlessly and arbitrarily apply an optional highway standard calling for the removal of center two-way turn lanes on Class IV highways such as Aurora, when such lanes are permitted by State law and regulation. Large trucks can not make U-turns on Aurora. Loss of this turn lane will: 1) Reduce freight mobility. 2) Slow freight delivery. 3) Divert freight trucks through adjacent residential neighborhoods seeking alternate "around the block" access routes to businesses. Or, 4) Add to street congestion while stopped in the BAT lane to unload.

61-42 **Surface Water Quality:** (page xxi): The assertion that "the impact of surface water from this project would be minimal is not true. Rudimentary data and technical details for cursory analysis of surface water impacts and management methods on this EIS document is not possible because the specifics and technical data have been glossed over or omitted. **COMMENT:** This EIS fails to sufficiently address the economic and social impacts of impounding and releasing storm water runoff.

61-43 **Line 4:** The assertion that "project related impacts under the build alternative would be limited potential degraded water quality contributions to local streams and potential increased flow rates and water volumes that could also degrade water quality and aquatic habitat", is an obfuscating understatement that requires clarification and full discussion. **COMMENT:** The cumulative impacts of massive flows of trapped and confined contaminated surface water flowing down hill should be obvious and must be addressed more adequately in this DEIS. This DEIS blatantly plays down the engineering, environmental, economic and social impacts of this proposal and seeks to ignore the questions, — "What about the surface water runoff from the remainder of the entire Aurora Corridor Project? Where will it ultimately go?" Boeing Creek or Thornton Creek in Shoreline (both salmonoid streams) and perhaps some into Greenlake in North Seattle? There is no technical information provided addressing the capacities necessary for the retention/detention ponds, location, size and how the city will prevent thermal pollution raising the temperature of the water as it sits in these R/D ponds soaking up the sun. Will the pond/ponds be open, underground or covered?

61-45 **Line 9:** The statement that "water quality will be improved" requires a more detailed explanation. **COMMENT:** Unlike now, where much of the surface water flows to the either side of the road and is dissipated over permeable surfaces, surface water in Alternatives A and B will be channeled by new curbing into rapid flowing "gutter" streams and fast flowing storm sewer surges. This will require extraordinary water impediment and treatment measures. What are they? Water flows down hill with gathering momentum and will require a substantial holding pond in the triangle at North 155<sup>th</sup>. Ultimately that water will have to be treated and then diverted either into Boeing Creek or Thornton Creek in Shoreline (both salmonoid streams) and perhaps some into Greenlake in North Seattle. Will Seattle agree to this? To what extent will extra measures be taken to accommodate surge flows and remove contaminants from the streams? **COMMENT:** Given Shoreline's sorry record of abuse to Thornton Creek at Twin Ponds, firm assurances and management details need to be further spelled out in the DEIS.

61-46 There is no discussion of maintenance schedules in this EIS. **COMMENT:** After researching this subject, I have learned that maintenance should occur after every storm event and on a regular monthly schedule throughout the year. What will be the impact on City resources?

61-47 **Surface Water Quality: (page xxi): continued:** This EIS does not disclose that "oil-water separators" are only partially effective in removing petroleum hydrocarbons from the water contained in the catch basins. Further, "oil-water separators" will not work at all if regular maintenance is not preformed. **COMMENT:** Researching this issue I have learned that storm water runoff treatment by any method other than Flocculation (an electrical process that causes polluted molecules to attract each other and form particular matter large enough to then drop out of the water because of gravity) is the only sure method to completely treat storm water runoff. Is the City prepared to provide this level of treatment? Or will the "Vortex/gravity and vault filtering systems" which will not remove anything in solution in the water such as anti-freeze, pesticides and nutrients.

(6)

61-48 **Line 10:** (page xx): The assertion that Alternative A will decrease more impervious surfaces for storm water runoff than the no build option is a misleading exaggeration. Raised medians will permit only an insignificant amount of storm water to percolate into the ground. **COMMENT:** No information has been provided to quantify the capacities of the current storm water system compared to the volume of storm water that will be captured by street curbing and the addition of two more traffic lanes and 16' of sidewalks. What are the capacities of the Aurora Ave storm water run-off systems required by the no build option compared to building Alternative A or B? What are the approximate total square feet comparisons of impervious surfaces in any of the three options in this DEIS?

61-49 **Line 11:** The assertion that "Hydraulic impacts to surface water would be improved by Alternatives A or B due to decreased impervious area " is misleading. **COMMENT:** Using underground vaults to capture stormwater will only be partially effective. If a second storm occurs shortly after the first event or a long term storm occurs, these vaults will rapidly fill and then be useless for the second or a continuing storm event. Sizes and capacities of these vaults are not included in this document or the "discipline" document.

61-50 **COMMENT:** If bio-swales are employed to filter pollutants from storm water runoff, the bio-swales will only filter part of the pollutants, which are, absorbed into the plants themselves. The plant life does not change or modify these pollutants and therefore must be periodically harvested, dried and burned. The ashes then need to be disposed of as hazardous waste. Has this process, which will cause more maintenance costs over time to be effective, been factored in the cost calculations for this project.

61-51 **COMMENT:** There are no specifics or a technical details in this DEIS regarding any "Spill Control Plan." The term "Treatment Facilities" is not defined and hardly discussed in this DEIS This document contains no specifics or technical details regarding a "Spill Control Plan." There are no specifics or data provided discussing what the BMP's will be and how they well address erosion/sedimentation mitigation controls.

**Wildlife, Fisheries, and Vegetation (page xxi)** This statement exaggerates the stormwater impacts on the environment in the No Build Alternative. This statement attempts to downplay and minimizes or gloss over the risks and problems that will impact either Boeing Creek or Thornton Creek and possibly Greenlake in Seattle.

61-52 **COMMENT:** Much of the stormwater that would result in the NO Build Alternative is absorbed in pervious surfaces bordering the highway and very little probably flows into Boeing Creek. Stream flow will increase considerably during big storms and will tax the capacity of the streams to carry away the surge of water that will result. In addition, bio mass/wetland stratagems will most likely be required off site to provide better protection for salmon habitat. More down stream erosion control measures will be required to reinforce existing problem areas, particularly on Boeing Creek and downstream in Shoreview Park. More information is required to better assess if the DEIS adequately addresses these issues.

61-53 **Hazardous Waste: (page xxii):** The DEIS ignores the continuing maintenance problem of collecting and disposing of hazardous waste accumulated and recovered from stormwater waste system. This DEIS does not calculate the volume or substances of toxic waste that will be recovered from waste water flushed from Aurora Ave.



61-54 **INTRODUCTION:** (page xxiii): The introduction fails to mention that SR99, Aurora Avenue is a Class IV highway as defined by WAC which permits cities the option to set their own speed limits between 30mph and 40mph. Cities are also permitted the option to keep center two-way turn lanes or opt for raised center medians. **COMMENT:** From the inception of this project, the City has wrongly insisted that their decision and justification to install raised medians (which requires a wider road right-of-way and land condemnation) was required by new highway design standards set by WSDOT. WSDOT on the other hand has consistently said they prefer raised medians for highways like Aurora but the choice is up to the City and they have chosen to not intervene. In fact the just completed neighboring SR99 improvement projects to the north in Edmonds and Lynnwood were permitted to opt against raised medians to reduce costs and to protect existing businesses.

**Line 12:** The assertion that the City's "goals for the project as stated in the Comprehensive Plan are to support economic stability along the corridor and provide multimodal transportation services" is false. The Comprehensive Plan does not call for the destruction of existing businesses on the gamble that something better may come along.

61-55 **COMMENT:** The City's preferred Alternative A, will result in the taking of some businesses parking, access and portions of buildings to the detriment of the business community. **COMMENT:** The City's preferred Alternative A is projected to cost \$28 million per mile (compared to \$6 — \$7 million per mile in Edmonds/Lynnwood) We are told now that about \$12 million of that amount is to be set aside as a reserve/contingency fund. The majority of the business owners on Aurora are opposed to this destruction and waste of money but their protests have been to no avail as have the unheeded protests of citizens groups like the Chamber of Commerce and Concerned Citizens for Shoreline. **COMMENT:** No one is opposed to fixing and sprucing up Aurora Avenue and a better plan has been presented by the Shoreline Management Association and Concerned Citizens for Shoreline that would accomplish the same task at a fraction of the cost without destroying or displacing any business.

#### **CHAPTER I; PURPOSE AND NEED FOR PROJECT: Purpose: (page 1-1)**

61-57 **Line 1:** Aurora Avenue North is misidentified as (SR 9) instead of SR 99.

61-58 **Line 2:** The statement that the project will "improve channelization, access management and pedestrian amenities, and improve multimodal transportation" with BAT lanes is false. **COMMENT:** 1) Channelization, is the City's preferred euphemism for raised median. (Here it is given more credit than it deserves.) 2) Traffic capacity, congestion and mobility will be little different if Alternative A or B is constructed than today, and it may be worse with the planned installation of added signalized intersections at North 152<sup>nd</sup> and at North 165<sup>th</sup> are constructed, which will dump additional "By pass" traffic into quiet residential neighborhoods. Most center lane two-way left turns for access to businesses will be eliminated by the medians or severely restricted and driveways will be combined—all to the detriment of businesses access. 3) There are few pedestrian destination places along this stretch of Aurora and therefore few pedestrians to justify construction of 12' sidewalk/amenity zones requiring widening the highway right-of-way by as much as 10' to 20'. 4) Multimodal transportation for BAT lanes are not needed. There is only one under-utilized "local milk-run" bus route (#358) on Aurora which the City and Metro Transit have tried to puff up with computer model invented ridership counts. There are no plans to increase the number of routes along this portion of Aurora Avenue. Currently, no valid study has been presented that demonstrates that the #358 bus has problems keeping up with traffic and therefore no justification for BAT lanes.

61-60 **Need For the Project:** The safety issues and local and regional transportation raised here are overstated. Aurora is not as dangerous as it is made out to be and local and regional traffic conditions will not be substantially improved. **COMMENT:** WSDOT traffic accident data and trip data used for this DEIS to justify the project are incomplete, out of date and exaggerated and manipulated to favor Alternative A. The biggest improvement will be the provision of trees along the length of Aurora to provide shade for the traffic jams. Cross-town traffic transiting Aurora Ave. North will not be improved.

61-63 **Safety:** (page 1-1): The assertion that "for years, Aurora Avenue North has been identified as a high crash corridor by WSDOT" is false. **COMMENT:** Shoreline's SR99 Aurora Avenue North is not even on the list of WSDOT's top 70 locations.

**Line 5:** The DEIS suggestion here that crash rates at 8.3 mvm (million vehicle miles) are on the increase is also false. **COMMENT:** Shoreline's SR99 crash rates have been on the decrease, which is acknowledged by WSDOT. When accidents in Seattle and Edmonds are deducted from the total mvm employed for this DEIS, Shoreline's share of accidents amounts to 6.08 mvm for 40,000 vehicle trips (which is probably a lowball traffic count. If the count amounts to as much as 45,000 to 50,000 vehicle trips, the mvm traffic rate will be even lower.

**Line 8:** The suggestion that shoreline's accident rates unfavorably with statewide averages for major arterials of 3 crashes per mvm is misleading and intended to confuse the issue. **COMMENT:** SR99 Aurora Avenue North is a major regional highway posted at 40mph. Comparing it to unnamed major arterials (35 mph) is comparing apples and oranges.

61-63A **Roadway Deficiencies:** (page 1-1): The description of lack of access management is used here to set the stage for destroying or disrupting business access to their properties. **COMMENT:** The proponents for change do not recognize or acknowledge that the traditional character of the businesses along SR99 Aurora Ave North were permitted to develop in a haphazard way when this was a rural highway. The perception that beautification (by elimination) and a chance to make a quick "Development" buck is the driving force propelling this project, is unavoidable. Urban renewal disguised and funded as highway improvements!

61-63B **Line 8:** (page 1-2) this litany of street deficiencies of accommodations for pedestrian and non motorized vehicles is accurate and is a powerful argument for the question — "why hasn't the City done something about it in the fashion of Edmonds and Lynnwood, all within the existing highway right-of way?"

61-63C **Social Demands** (page 1-2) The process described in the following sections about the development of Shorelines Comprehensive Plan is not as clear cut and decisive as the City would lead us all to believe. **COMMENT:** Early-on, following incorporation, Shoreline's planning process, which seemed driven to a "Growth Management Act" frenzy captured by Developers, was stacked by the City Council to produce a predetermined "urban renewal outcome" for the Aurora Corridor. Contrary citizen opinions and input were ignored or manipulated to beyond recognition. Early on, a naked attempt was made to double the size of commercial zoning along Aurora Avenue North for radical redevelopment and along 15<sup>th</sup> NE and NW Richmond Beach Rd to substantially increase residential density. The resulting citizen's hue-and-cry forced the City to scale back its plans. Attempts then by citizens for more inclusion in the process and appointments to the commissions and various bodies studying growth and Code issues for recommendations were rebuffed. Unless persons actively kept involved and spoke up at every opportunity, the vast majority of Shoreline residents were passively unaware of what this project sets out to do. Contrary to City claims, there has not been an overwhelming outpouring of citizen support for the City's Alternative A or B for Aurora Avenue North.

**Economic Development;** The City's vision of improvements to Aurora Avenue North is to get rid of the "highway" environment, in order to redefine the Corridor's commercial environment that calls for creating 3300 new jobs in concentrated activity centers of commerce centered between North 155<sup>th</sup> and North 160<sup>th</sup> and between North 200<sup>th</sup> and North 205<sup>th</sup>. **COMMENT:** The plan is not specific about what happens between those two centers but there are separate (but related to SR99 projects) to develop a Government/business park center at North 175<sup>th</sup>.

61-64 **Legislation:** (page 1-3): Application of the City's interpretation of Washington (RCW) 47.50, and the WSDOT Access Control Classification System espoused here is incorrect. **COMMENT:** the City's interpretation of the law and regulations reads like a "green-light" mandate to create raised medians and wipe out all business access points any closer than 250' to justify Alternative "A". Again, WSDOT regulations are misinterpreted and any mention of the Class IV highway speed limit of 30 to 35mph is omitted (WAC-468-52-040); to suit the City's purposes to justify forcing businesses to close. The DEIS incorrectly and purposely lists medians as required, without specifying that Class IV highway medians can be non-restrictive (as exist now) or planned medians (as proposed).

**Line 15,** the misleading theme of preservation of safety and traffic operations is repeated to justify a solution where none is required.

61-65 **Regional Transportation: (page 1-3): Capacity:** The assertion in the lead sentence that "the current facility is inadequate to accommodate projected traffic volumes" and that a service Level Of Service (LOS) is "F" along Aurora is indicated, is supported by deceptive manipulated data in Table 1-2 to make a point. **COMMENT:** Upon examination of DEIS table 1-2, North 152<sup>nd</sup> and North 165<sup>th</sup> are listed as LOS of "F" intersections. This distorts the facts to skew the data to favor the preferred outcome. Table 1-2 obscurely footnotes the fact that these two intersections are not signalized intersection and that the LOS of "F" classification applies to the delay on a small commercial/residential street and a residential side street) and not to Aurora Avenue North where there is no delay. The reader is left with the impression that Aurora Avenue North is rated LOS "F" when the wait is on these two side streets at their intersection with Aurora Avenue North.

61-65A **Line 5: (page 1-4):** This makes the argument for capacity improvements to justify severe reduction of business street access points, based on skewed and incomplete data.

61-65B **System Linkage (page 1-4):** The discussion here makes a strong point for the critical importance of Shoreline's Aurora Avenue North in the state highway system, which argues against plans to turn Aurora from being a highway into Shoreline's main street with more signalized stop streets and pedestrian crosswalks. **COMMENT:** Shoreline cannot have it both ways – highway or main street. It is illogical if not folly to turn a major truck route highway of this magnitude into a main street. The logical place for main street development is Midvale Avenue North parallel to SR99 Aurora Avenue North between North 175<sup>th</sup> and North 192<sup>nd</sup> which has been proposed by citizens and merchants and is under consideration in a separate sub-area planning process.

61-66 **Line 10 (page 1-5) :** Implying that the proposed highway improvements (more stop lights, pedestrian crossings, channelization to restrict freight mobility access to businesses and street beautification) will reduce Aurora Avenue North LOS ratings is deceptive.

Transportation Demands: The list of regional policies that will be satisfied by Shoreline's SR99 Aurora Avenue North improvement plans is meaningless and in the strictest sense can not and will not be fulfilled.

#### **Project Termini and Why they are Logical:**

61-67 **Rational for Establishing Project Scope:** The traffic volumes in Table 2-1 look to be based on out of date data and are low for Shoreline. This is deceptive and incorrect, **COMMENT:** If utilizing 40,000 ADT's for North 160<sup>th</sup> and North 165<sup>th</sup> where we have a LOS – F, this results not from capacity or congestion on Aurora Avenue North, but instead, upon the west leg of the two streets intersecting with Aurora..

61-68 **Line 21:** Listing the intersection North 165<sup>th</sup> with a LOS-F rating is deliberately deceptive and intended to exaggerate the impression of congestion on SR99 Aurora Avenue North at this point. **COMMENT:** The LOS-F rating applies to the minimal residential side street traffic on North 165<sup>th</sup>

61-69 **Line 27:** The assertion that the North 145<sup>th</sup> to North 165<sup>th</sup> includes the highest crash locations is misleading and exaggerated. **COMMENT:** The DEIS uses incorrect or "made up" high accident location (HAL) and Pedestrian accident location (PAL) data. North 165<sup>th</sup> is listed as one of the highest. An actual examination of WSDOT data reveals that North 165<sup>th</sup> is one of the lowest in the entire corridor in Shoreline. Using WSDOT figures, the 2 year accident rate based on mile post location on Shoreline's SR99 Aurora Ave North corridor per MVM is 6.08 accidents per MVM as compared to the DEIS stated rate of 8.3 accidents per MVM. These and other obvious discrepancies in DEIS stated accident rates calls into question the validity of any data reported in the DEIS.

61-70 **Table 2-1:** The average annual daily trips traffic count numbers make no sense and may be incorrect. Logic dictates that the highest volume of traffic is dictated by source and destination and that there will be a closer correlation between those numbers than shown in the chart.

61-71 **Alternatives From Pre-Design Screening:** (pages 2-5 to 2-9): Listed are the alternatives from scoping and alternatives submitted by the public. The alternative proposed by the Shoreline Merchants Association and Concerned Citizens for Shoreline is omitted and should have been included. **COMMENT:** Each of the citizen's proposals is rejected based upon an incorrect application of the WAC-48 (Raised medians are not required on Class IV highways). One alternative was rejected because safe pedestrian crossings are not included, although the proposal submitted by the Shoreline Merchants Association and Concerned Citizens for Shoreline, included more safe pedestrian crosswalks than that proposed in Alternative A or B in the DEIS. Other alternatives were rejected because wider sidewalk widths compromised pedestrian environment and or safety. It has never been shown how wide sidewalks correlates to safety. None of the alternatives listed on page 2-10 met project criteria and so were not included in the full document for full environmental analysis, based on incorrect application of WAC regulation for Class IV highway non-restrictive or existing planned medians.

61-74 **Design Alternatives To Meet Full WSDOT Design Levels:** (page 2-10): The design alternative to meet full WSDOT design levels describes a cross section (except sidewalk width) with road dimensions for the preferred design. The preferred cross sections are comparable to the design excluded from the DEIS, proposed by the Shoreline Merchants Association and Concerned Citizens for Shoreline (accept wide sidewalk/pedestrian amenity zone). The dimensions for the preferred design listed in the DEIS are incomplete. Further on, DEIS discusses a four-foot outside shoulder for bike use but since sidewalks and shoulders and total width is not described, it is impossible for a lay person or engineer for that matter, to evaluate this design. This proposal was rejected and not included in the full EIS. **COMMENT:** The criteria for inclusion of alternative proposals in this DEIS, appear to be uneven and very selective to insure that the preferred alternative will be selected.

61-75 **Alternative A:** (page 2-11): This description calls for a raised median except at signalized intersections where left turns and U-turns will be allowed, will meet full WSDOT requirements is misleading. **COMMENT:** Ignored is the fact that WSDOT requirements for Class IV highways does not require a non-restrictive or planned median. Omitting mention of non-restrictive median design permissibility or Class IV highways, reinforces the perception of wrongful DEIS manipulation to influence acceptance of the preferred alternative.

61-76 **COMMENT:** (See figures 2-2, 2-14, 2-15, 2-16) There has been no discussion for speed limits for the proposed project area and the subject has not been addressed. Currently the limit is 40mph but that is most likely to be lowered 35mph as traffic congestion increases and with the addition of more signalized intersections that will interrupt the flow of traffic. The erroneous application of non-restrictive existing or planned medians has also not been addressed in this DEIS. The probability 1/2-mile distribution of Stop -signalized intersections and the slow sporadic evolution of land uses will likely come about. The exclusion of critical passages of WAC-468 will hinder and limit any analysis of the alternatives presented in full or in part in the DEIS by lay persons and engineers alike.

61-77 **Alternative B:** (page 2-16): My comments for Alternative A apply also to B. **COMMENT:** In the last paragraph on page 2-16, States that 7' sidewalks do not meet the City Development Code. Since City officials have told Shoreline merchants that the City will be flexible on sidewalk widths, this flat prohibition against 7' sidewalks is rather arbitrary and capricious.

61-78 **Traffic Volumes:** (page 3-4): The explanation for the traffic volume anomaly at North 160<sup>th</sup> is confusing and does not fully account for the average daily traffic counts shown in Table 2-1.

61-79 **Level of Service (LOS);** (page 3-6); The assignment of LOS – "F" for N. 165<sup>th</sup>, which does not apply to traffic on Aurora Avenue, is deception. **COMMENT:** The LOS – "F" at N. 165<sup>th</sup> applies to side street traffic delay on N. 165<sup>th</sup>. Installation a simple median here would lower the LOS rating to an A, B, or C, but this and other options were never considered (which is a requirement for signalized intersections). Installation of the demonstration project raised median at N. 170<sup>th</sup> has increased the LOS rating considerably.

61-80 **Crashes and Safety:** (pages 3-6 & 7) The HAL and PAL statistics reported here in the DEIS are grossly exaggerated and deceptive. **COMMENT:** The HAL and PAL statistics listed are not the highest in the state and hardly qualify for priority treatment according to WSDOT figures and standards. The record at N. 165<sup>th</sup> is almost non-existent in the years 1999 and 2000 when only a hand-full of accidents were reported, none of which were pedestrian or fatality accidents. Calling Aurora Avenue one of the highest accident corridors of its type in the state is incorrect and borders on deception. Aurora would hardly qualify for priority treatment, based on actual WSDOT accident data and statistics. In this case, accidents here are statistically insignificant given the very high volume of vehicles that traverse this corridor daily. One must question where and how the DEIS data originated because based on the printed record, WSDOT quantifies the HAL's and PAL's much differently than that found in the DEIS.

61-81 **Environmental Consequences:** (page 3-8) The first paragraph fails to state that the Comprehensive Plan called for the traffic counts around the college for times that college was in session (pages 86 – 87, Comp Plan)

61-82 **Line 1:** (Page 3-9) Mid-block U-turns from the center median traffic from signalized intersections and from mid block are provided for each Alternative (A and B). **COMMENT:** There has been no discussion about the probability of increased accidents by making left turn U-turns when they are made from focused left turn lanes rather than from unfocused center two-way left turn lane which are spread out over a greater distance. The unfocused two-way left turn lane eliminates the need to make unsafe and impossible (for trucks) U-turns. If U-turns are made at mid-block focused turn lanes, they can not possibly be any safer than the conditions present on Aurora's unfocused center two-way left turn lanes today. **COMMENT:** U-turns should be described in their regular classification as an unsafe maneuver—to be discouraged, except at intersections where additional width is provided, by anything wider than a automobile or pick-up truck. Visualize a Semi-truck attempting a U-turn. With the present unfocused center two-way left turn lane trucks do not need to make U-turns or drive around the block through residential neighborhoods to reach their destination. Focusing of left turns at intersections has the added problem of U-turning vehicles conflicting with vehicles making right turns at the intersection from the cross street. Who has the right-of-way?

61-84 Focusing more left turns at the intersections coupled with U-turns will require longer signal phases or an added specific U-turn light which will create more congestion and time delay at intersections, earning those intersections a sure LOS-F rating.

61-85 **Fig. 3-2:** (page 3-11) Once again, The LOS at the intersection with Aurora Avenue North and N. 165<sup>th</sup> is deceptively listed as LOS-F rather than clearly indicate that it is only LOS-F for the relatively few cars on the residential side street.

61-85 **Table 3-5:** (page 3-12): The table distorts the LOS ratings for N. 165<sup>th</sup> St. and assigns it a meaningless LOS-B rating for the build alternative. These LOS ratings apply only to traffic on the residential side street. Assigning a LOS-B to the build alternative for N. 160<sup>th</sup> is Polly-anishly optimistic. The level of improved individual and collective LOS levels at the intersections insignificant and can hardly be called an improvement.

61-86 **No Action alternative:** (page 3-13) Spill-over traffic is predicted if no action is taken. **COMMENT:** Spill-over traffic will become a problem no matter what option is chosen, — particularly if more signalized intersections are added to Aurora Avenue.

61-87 **Cumulative Transit Impacts:** (page 3-20): To suggest that transit services will increase and improve if the preferred alternative is built is disingenuous. **COMMENT:** Metro transit has no short term or long term plans and no money for upgrading bus service on Aurora between N. 145<sup>th</sup> and N. 175<sup>th</sup>. To suggest otherwise is politically-correct deception.

61-88 **Construction Impacts** (page 3-21): Impacts related to the build alternative (Traffic diversions into neighborhoods and cut through traffic into the neighborhoods) is finally acknowledged and citizens are advised they will need to find alternate routes or ride the bus. **COMMENT:** This statement is tantamount to admitting what here-to-fore has been downplayed. Massive traffic delays and disruptions will occur. Problem: There is only one bus route serving the impacted area (bus #358). How is it going to make it through the impacted area any faster? And how will it serve residents who drive their cars to areas not served by bus #358 or any other bus for that matter?

61-89 **Maintaining Access Communication:** (page 3-23) Assuring adequate signage to direct motorists to temporary business access is assured but how is it to be accomplished? **COMMENT:** Again these assurances seem disingenuous. Given the close proximity of one small business to another, the shallow set-back of structures from the street, the short distance between one business driveway and the next, the lack of alley ways or many cross streets, coupled with loss of parking, I fail to see how assurances of this type can be kept. Conditions here are totally different than those in Edmond and Lynnwood where businesses were spread out and usually set well back from the street, allowing many opportunities to provide alternate access routes. I think the hardly veiled intent here is "urban renewal removal."

### **Environmental Consequences (page 3-27)**

61-90 **Construction Impacts:** (page 3-27, 4<sup>th</sup> paragraph) the statement that no buildings will be demolished nor sensitive areas impacted is misleading if not false. **COMMENT:** A number of buildings will be partially demolished (particularly in subsequent completion of the next two phases of this overall improvement program. Storm water management will require work in one of two watersheds that will impact downstream salmonoid fish habitat (Boeing Creek and or Thornton Creek). No attempt has been made in this DEIS to quantify that impact or the measures required to protect those habitats.

61-91 **Alternative A** (page 3-28 & 3-29) here it is acknowledged that residential property values may be depressed **COMMENT:** Here-to-fore, expressed public concerns about loss of residential property values in proximity to large projects have regularly been discounted in the Comprehensive planning process and the Aurora Corridor project. The City has not been forthright.

61-92 **Line 8, Alternative A** (page 3-29) The assurances given here, that cut-through traffic will not occur, is not true and disingenuous. **COMMENT:** Just the opposite statement is made on page 3-21 (Construction Impacts)

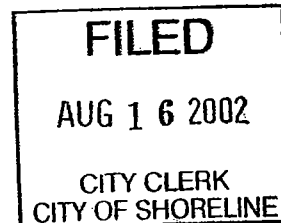
Clark Elster

Major, retired, Seattle Police Dept.

Commander of Traffic and Parking Enforcement.

Responsible for all major event traffic and staffing planning.

Responsible for Police /City DEIS impact planning for all major development projects



*Cus*  
*4:55pm*

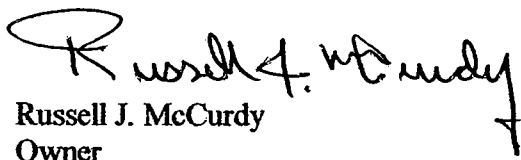
August 16, 2002

Shoreline Planning Commission  
17544 Midvale Avenue North  
Shoreline, Wa. 98133

Attention: EIS Hearing Examiners  
Aurora Corridor

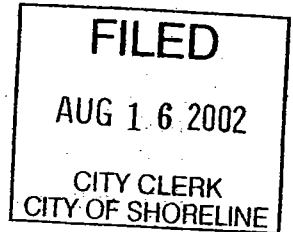
- 62-1 I am writing to you to oppose the EIS draft as adopted by the City of Shoreline. The EIS and the improvement project it represents is flawed, extravagant and a waste of tax dollars. I, like many merchants in Shoreline believe in improving Aurora but with a responsible and realistic plan. The Shoreline Merchants Association has presented an alternative plan that needs to be considered.
- 62-2 I object to the width of the sidewalks and the proposed continuous raised median. The 12-foot sidewalks are a waste of limited commercial frontage for an already built-out urban commercial corridor. In many instances those 12 foot sidewalks with landscaping will take most or all of small business parking-making it very exciting for the small business to survive. Why do you need such large sidewalks when you already have
- 62-3 funding for the adjacent Interurban Trail that has walkways, bicycle and jogging paths for the public? With a resource like that is it responsible to push 12 foot sidewalks at such a tremendous cost.
- 62-4 The continuous raised center medians will reduce access for the public and create a huge impediment of freight mobility on this 3 mile stretch of Aurora.
- 62-5 The EIS should include the entire 3 miles of the project not just from 145<sup>th</sup> to 165<sup>th</sup> to better judge the social economic impact.
- 62-6 The alternative plan for improving Aurora created by the SMA will solve the traffic problems at less than one third the cost without destroying businesses, jobs and tax flow. It's a sensible alternative that meets the traffic, safety, and economic needs of the community.

Sincerely,

  
Russell J. McCurdy  
Owner

August 15, 2002

Tim Stewart, AICP  
SEPA Responsible Official  
17544 Midvale Avenue North  
City of Shoreline  
Shoreline, WA 98133  
206-546-1508



Re: Draft Environmental Impact Statement, Aurora Corridor Project

Mr. Stewart,

Please note other comments on the Draft Environmental Impact Statement are included with the Shoreline Merchants Association comments and documentation.

- Mr. Ken Cottingham, Cottingham Transportation Engineering
- Mr. Randy Ferrell, Ferrell-Penning, Inc., Board Member - SMA
- Mr. Walt Hagen, Chair – Hillwood Neighborhood Association, Concerned Citizens For Shoreline
- Mr. Daniel A. Mann, Tropical Tan, Board Member – SMA
- Shoreline Chamber of Commerce
- Patty and Tim Crawford, Twin Ponds Fish Friends for SMA
- 15 businesses from the International District between 145<sup>th</sup> and 165<sup>th</sup>
- Signatures of citizens who support the SMA/CCFS plan (Alternative 'C')
- Mr. Tom Holz, SCA Consulting Group
- Signatures of citizens who agree with the comments submitted by SMA

Respectfully Yours,

Diana L. Stephens,  
Secretary, Shoreline Merchants Association



The stated purpose of the proposed project as stated in the Draft Environmental Impact Statement (DEIS) is increased safety on SR 99. Safety is the theme for the vehicle drivers, the bicycle commuters and the pedestrians using the new roadway to be built throughout the DEIS.

63-1

This DEIS represents a project that under the guise of safety which proposes to spend \$30,000,000.00 on just 1 mile of the 3 miles of SR99 that passes through the City of Shoreline. Page xxiii of the DEIS states "The City of Shoreline has two improvements (sic) projects for Aurora Avenue North from the southern City Limits at North 145<sup>th</sup> to the northern City limits at North 205<sup>th</sup> Street, but only one is currently funded. However, only a limited amount of project funding is available at this time, and there is no certainty regarding if or when additional funding will become available". Even with a raised center median included \$30,000,000.00 will buy 6 foot sidewalks for the entire 3 miles of SR 99 on both sides of the highway, and an additional lane both north and south (total of 6) to be used as a Business and Transit lane, an High Occupancy Vehicle lane, or a General Purpose lane.

Title 23 of the US Code section 109 under Standards (exhibit 1) states "...assure that possible adverse economic, social, and environmental effects relating to any proposed project on any Federal-aid system have been fully considered". The author(s) of the DEIS have failed to address adverse economic impacts to businesses because of the proposed raised center median, even though clear evidence is available that such medians have created severe economic impacts on businesses elsewhere in the United States. Since Federal funding is involved please explain why the City of Shoreline and the author(s) of the DEIS have chosen to ignore this requirement?

63-2

Title 23 Section 109 also states that "adverse employment effects" are to be studied yet the author(s) of the DEIS have failed to do so. Would the City of Shoreline or the author(s) of the DEIS please detail what studies, polls, or surveys were done with the businesses affected by this proposed project between North 145<sup>th</sup> and North 165<sup>th</sup>?

If such studies, polls, or surveys were completed by the City of Shoreline or the author(s) of the DEIS why isn't this pertinent information included in the DEIS?

63-3

Page xix of the DEIS under Social states "Neither proposed build alternative nor the No Action Alternative for the Aurora Corridor Project would have substantial social impacts on recreational facilities, regional and community growth, public services, and pedestrian and bicyclists facilities". Based on these words of the DEIS author(s) much of the proposed Alternative A and B won't really accomplish the stated goals. Would the City of Shoreline please explain why this boondoggle should be approved in any form when it can't reach previously stated goals?

63-4

The proposed Aurora corridor plan by the City of Shoreline and the WSDOT is presented as a 20 year improvement for traffic congestion through the City. Bicycles have been an accepted option for commuting for many years yet no dedicated bicycle lanes are designed into the plan. Why not?

Portland Oregon has 288 miles of dedicated bicycle lanes for riders. Brita Johnson coordinator for the Bicycle Transportation Alliance states "There are two things I hear from everybody that has moved here: 'I see so many bikers here' and 'it's so much easier to bike here than in other cities where I have lived'. Portland's climate is quite similar to Seattle so why has the City of Shoreline ignored this non-polluting mode of commuting?

63-4  
CONT.

According to bicyclinginfo.org of the Pedestrian and Bicycle Information Center (exhibit 3) "Shared use paths are an addition, and complimentary, to the roadway network: they are not a substitute for providing access to streets and highways". Would the City of Shoreline please explain how the proposed project will meet this transportation need?

Exhibit 30 which is based on AASHTO's guidelines "Provisions of a bicycle path should not be used as a rationale for prohibiting use of parallel roadways by bicyclists or as an excuse for not designing such roadways to be compatible with bicycle use". Would the City of Shoreline and the WSDOT please address the fact that the current proposed road project appears to fall short of current contemporary design guidelines?

63-5

Please explain how the safety of those who will use SR 99 between North 145<sup>th</sup> and North 165<sup>th</sup> becomes more important than the safety of those using the roadway between 165<sup>th</sup> and 205<sup>th</sup>.

63-6

The Edmonds/Lynnwood projects (exhibit 4) were completed for between \$4,000,000.00 and \$6,000,000.00 per mile. A raised center median can be built for less than \$1,000,000.00 a mile. Even with inflation added the City of Shoreline could have a safe and very serviceable rebuilt highway for \$21,000,000.00 to \$25,000,000.00. The City of Shoreline currently has \$28,000,000.00 to \$30,000,000.00 for the one mile of highway.

63-7

Could the City of Shoreline and the Washington State Department of Transportation (WSDOT) please detail how many deaths and injuries are acceptable along the unimproved section of SR 99 between North 165<sup>th</sup> and North 205<sup>th</sup> so that the one mile between North 145<sup>th</sup> and North 165<sup>th</sup> can have the following "necessities:

- A. Planted medians
- B. 4-foot amenity zones
- C. Overly-wide sidewalks
- D. Underground utilities

63-8

According to the FHWA document "Development and Evaluation of Alternatives" (exhibit 5) "the no-build alternative (which might include short-term minor activities, like safety upgrading and maintenance projects) might not seem reasonable". Yet the DEIS

63-8  
CONT contains no suggested safety upgrades such as installing sidewalks where none exist, adding continuous highway lighting, or other maintenance projects. Why not?

63-9 Page xix under Social" paragraph 3 states that "no high and adverse human health or environmental effects of this proposed project are expected to fall disproportionately on minority or low-income populations". Apparently the author(s) of this DEIS have not personally visited the businesses between North 145<sup>th</sup> and North 165<sup>th</sup>. The largest group of minority owned businesses along SR 99 through the City of Shoreline are in this first mile. Information will be offered later to show the adverse effects on businesses that raised center medians have had on other urban commercial highways. Many minority owned businesses will have their access and egress greatly reduced between North 145<sup>th</sup> and North 165<sup>th</sup> which could lead to failure of these owners. This project appears to be an attempt at *ethnic urban renewal*. This is a most serious prospect and this reader request that the City of Shoreline and the WSDOT address this issue immediately.

63-10 Page xxiii of the DEIS also makes reference to "unsightly commercial strip development" along Aurora. Exactly who is the one making this statement and what other areas are they comparing this part of Aurora to?

63-11 The DEIS on page 1-1 attempts to paint a picture of this section of SR 99 as being a "high crash corridor" yet this section of highway is not on the WSDOT's list of the top 71 most dangerous sections of highways. This fact has been brought to the attention of the City of Shoreline and WSDOT yet it has been ignored for the purpose of the DEIS. Why?

63-12 Crash rates on commercial urban highways are virtually always higher than the overall state average. The author(s) of the DEIS are the professionals and should know this. Would the City of Shoreline please explain what was the purpose of the comparison by the author(s) of the DEIS on page 1-1 paragraph 4?

63-13 Page 1-2 third paragraph speaks of a "general lack of safe passage for pedestrians and bicyclists" yet the author(s) of the DEIS seem to be aware of the Interurban Trail. Would the City of Shoreline please exactly how much space needs to be committed to pedestrian and bicycle traffic in this one mile of town?

63-14 Page 1-2 paragraph states that "The City of Shoreline Comprehensive Plan forecasts 3,300 additional jobs in the entire corridor". That amounts to 1000 new jobs a mile-where will these jobs come from?

63-15 Page 1-2 paragraph refers to banks, porn video (shops), and appliance stores. What are the names of these businesses' between North 145<sup>th</sup> and North 165<sup>th</sup>?  
Is it the position of the author(s) of this DEIS that (page 1-2 paragraph 5) "banks, offices, self storage, service, automobile repair, mini-casinos, porn video, and appliance stores" are not worthy to be in business?

Is it the position of the author(s) of this DEIS that some chosen few have the "right" to pick and choose who can do business in the City of Shoreline?

Please detail whose religious or moral beliefs will be used to make the decision as to what business gets to stay, and which ones have to go?

63-16 Does the City of Shoreline believe that these "undesirable" businesses survive on customers that come from other cities to patronize them here even though virtually every one of these "undesirable" businesses is available in their own town?

Is it the contention of the City of Shoreline that the undesirable businesses listed on page 1-2 paragraph 5 are not supported by the patronage of citizens of the City of Shoreline?

63-17 Paragraph 3 on page 1-3 cites SR 99 through the City of Shoreline as being rated a Class 4 highway by the WSDOT. By WSDOT's own definition a Class 4 highway "in this class are typically distinguished by existing or planned nonrestrictive medians. Restrictive medians may be used". The author(s) of this DEIS deliberately are attempting to mislead the reader that a restrictive median is a requirement. Why?

63-18 According to WSDOT's Class 4 highway designation (exhibit 6) "It is the intent that the design of class four highways be generally capable of achieving a posted speed limit of thirty to thirty-five mph in urbanized areas". The City of Shoreline would certainly be classified as an urban area so why isn't the excessive forty mph speed limit addressed in the DEIS?

63-19 The author(s) of the DEIS also attempt to mislead the reader in Paragraph 3 on page 1-3 when they state "minimum driveway spacing of 250 feet". The author(s) of the DEIS have left out the next line (exhibit 6) which states "Nonconforming connection permits may be issued may be issued to provide access to parcels" which in most cases negates the 250 foot "rule". Please explain why this very pertinent information was omitted?

According to WSDOT's Class 4 highway designation (exhibit 6) (b) Access control design standards (ii) Private direct access subsection (A) states No more than one access shall be provided to an individual parcel or to contiguous parcels under the same ownership" which would also negate the 250 "rule". Again the author(s) of the DEIS chose to delete this language. Would the City of Shoreline please detail the reasons why?

63-20 Paragraph 5 on page 1-3 speaks of level of service (LOS) if no improvements are made. This paragraph refers to a purported average delay of 80 seconds per vehicle based on a chart on page 1-4. The author of this summary (CH2M Hill) would have the reader

63-20

CONT.

believe that vehicle delay time at North 152<sup>nd</sup> which only travels east, and the delay time at North 165<sup>th</sup> which only goes eastbound for ½ block and west into a residential area would be a longer wait time than at the arterial intersection of North 155<sup>th</sup> and SR 99. Would the City of Shoreline, the WSDOT, or the author(s) on the DEIS please provide the technical data used to reach this conclusion?

63-21

WSDOT's Class 4 (b) Access control design standards (exhibit 6) state "Where feasible, major intersecting roadways that may ultimately require signalization shall be planned with a minimum of one-half mile spacing". Since North 152<sup>nd</sup> and North 165<sup>th</sup> have experienced little or no change in private or commercial use in the last 10 -15 years they would not qualify as a "new connections, public or private" to receive a variance. By what State or Federal statute does the City of Shoreline cite to circumvent Washington State regulations in regards to these two additional traffic signals?

63-22

Traffic light synchronizing can undoubtedly assist light to moderate traffic loads. Rush hour is a misnomer because it lasts several hours in the morning and afternoon. Motorists can only respond to light changes so fast, with each driver's response being slightly different. This section of SR 99 currently has three traffic signals, with two more planned. If each current signal has a 4 minute cycle with 60 % of that cycle committed to north and south traffic that would leave a total "green time" available to motorists of 144 seconds per light, or 432 seconds for the one mile of roadway in question. The balance of "green time" would go to east-west and turning traffic, or a total of 288 seconds. Under a 5 traffic light scenario north-south traffic would have 720 seconds of "green time", but east-west and turning traffic time would increase to 480 seconds, or a total of 48 seconds over the three light system. If one is forecasting an increase in north-south traffic there certainly will also be an increase in east-west traffic so these seconds will be needed. It would appear that mathematically even with synchronization of the traffic lights the two proposed new lights will in fact slow commuter traffic through the City of Shoreline. Please provide any statistical data, models, or research to support the DEIS claim that prove that the two proposed new lights at North 152<sup>nd</sup> and 165<sup>th</sup> will reduce travel or commute time through the City.

Page 1-4 paragraph 1 states "Capacity improvements are needed" and cites signal improvements as one of the cures. If signal improvements would really improve capacity wouldn't we install them on freeways?

SR 99 is an urban commercial highway. As such it carries many cars and trucks north and south each day. SR 99 by sheer nature of being part of the Federal highway system it is noisy, dusty, stinky from exhaust, and has wind gusts from passing vehicles. The DEIS states to expect traffic to increase by 1.25% to 1.75% annually. That means there will be

63-23

more noise, dust, exhaust and wind gusts. Will the City of Shoreline or the author(s) of the DEIS please provide any scientific data that was utilized to reach the conclusion that based on the environment an urban commercial creates that sidewalks of any type will lure pedestrians to walk next to the highway?

63-24

Page 1-4 paragraph 2's last line makes a claim the condition of SR 99 "dissuades many potential transit patrons from using the bus system". Would the City of Shoreline or the author(s) of the DEIS please provide research data or transit rider public opinion polls to substantiate this statement.

Paragraph 4 on page 1-4 states "WSDOT has listed this corridor as a critical need in its 20-year plan" and is "considered a high priority", is "critical to statewide and regional intermodal mobility needs". Would the City of Shoreline or the author(s) of the DEIS, or the WSDOT please explain how modifications to only 1 mile of this 3 mile corridor will address any of those "priority and critical" needs?

63-25

Based on the statements made in paragraph 4 page 1-4 that "WSDOT has this corridor as a critical need in its 20-year plan", "is considered a high priority" as a "highway of statewide significance, critical to statewide and regional intermodal mobility needs". Please explain how the following proposed improvements will address any of the above concerns:

- A. Amenity zones
- B. Sidewalks wider than the mandated ADA 5 feet.
- C. 17 foot planted median instead of Jersey barriers.
- D. Excessive costs of private property condemnation for larger right-of-way.
- E. Underground utilities.

63-26

Page 1-5 paragraph 1 cites "Shoreline portion of Aurora Avenue North is located in a dynamic and complex regional transportation system" that "carries more than 5 million tons of freight annually". What results can be anticipated in increasing freight mobility by improving just 1 mile of the 3 miles of SR 99 that travel through the City of Shoreline?

Page 1 paragraph goes on to say "Lane capacity improvements at signalized intersections are needed to improve capacity and LOS along Aurora Avenue North to move people and goods more efficiently through the corridor". How can this proposed roadway improvement have any effect on moving people and goods more efficiently when it is only 1 mile long?

63-26A

The last sentence of paragraph 1 on page 1-4 is very true. "timely delivery of goods is extremely important to business operations and economic vitality". Virtually every business between North 145<sup>th</sup> and North 165<sup>th</sup> count on timely delivery of the goods and products they sell. Yet it appears that the City of Shoreline and the WSDOT by virtue of removing the two-way left-turn lane believe it is more important to rush other businesses'

63-38A  
CONT. freight to them while impeding ours. Aurora businesses do not have alleyways to use like many commercial districts so they count on unrestricted access from the front of their businesses. Doesn't the WSDOT, and more importantly the City of Shoreline understand that the business district along SR 99 is unique and needs that lane?

Paragraph 3 page 1-5 reads "The City of Shoreline's Aurora Avenue North Corridor Improvement projects satisfies the following regional policies". Will the WSDOT or the City of Shoreline please explain:

- 63-27
- A. How the plan "optimize(s) and manage(s) the use of transportation facilities and services" when all \$30,000,000.00 is being spent on just 1 mile, leaving the last 2 unimproved?
  - B. How the plan "Manage(s) travel demand by addressing traffic congestion" with all available funds being spent on just one mile and no promise or commitment of future funding for the remaining 2 miles?
  - C. How does the plan "focus('s) transportation investments by supporting transit and pedestrian-oriented land use pattern". Does the City of Shoreline and the WSDOT really believe that spending \$30,000,000.00 on 1 mile of highway and leaving the last 2 miles unimproved is an "investment"?
  - D. How the plan will "expand transportation capacity" and detail what other "greater mobility options" will be offered?
- 63-28

63-29 Page 1-5 paragraph 5 states that "The needs for improvements along Aurora Avenue North have long been recognized by local governments". The cities of Edmonds and Lynnwood, and part of south Everett recognized their fiduciary responsibility to provide a safe and serviceable road for all of their city's residents, visitors, and commuters on SR 99 for the entire distance within their respective city limits. Edmonds, Lynnwood, and south Everett scaled back their projects to provide safe passage for all pedestrians, bicyclists and motorists. The City of Shoreline has decided that only a chosen few deserve the safety of sidewalks and expanded lanes. Why?

On page 1-6 the first bullet point speaks of levels of growth and to "enhance the quality of life within the City of Shoreline". Quality of life is a very subjective term. Quality of life to one person may not be the same for another. Exactly what gauge was used by the City of Shoreline to establish what "quality of life" is?

63-30 The second bullet point on page 1-6 reads that the City should "Pursue a strong and diverse economy". The economy has been quite stable in Shoreline for quite a long time until business owners learned of the impending median. Now some have left and others are bound to follow. The author(s) of the DEIS have certainly detailed that the business community is diverse, so what does the City of Shoreline mean by this comment?

The second bullet point on page 1-6 goes on to state to "ensure that economic development compliments neighborhood character". Would the city of Shoreline please explain:

63-30

cont.

- A. What is the neighborhood character or the City of Shoreline?
- B. Who establishes it-and when do they establish it-and how often?
- C. Does this mean that if a particular minority only represents 5% of the City's population that they should only make up 5% of the business development?

63-31

Bullet point number 3 on page 1-6 seems to make little sense. Would the City of Shoreline or the author(s) of the DEIS please explain how one mile of sidewalks and bus lanes with 2 additional intersections is going to have any measurable improvement of any transportation system?

Paragraph 4 page 1-6 speaks of "Goal LU VII" to "redirect the changes in the Aurora Corridor from a commercial strip to distinct centers with variety, activity and interest". Outside of cities such as Leavenworth and Winthrop would the author(s) of the DEIS or the City of Shoreline please pinpoint exactly where these types of towns exist that have an 80+ year old urban commercial highway running right down the middle of them?

63-32

Again in reference to paragraph 4 page 1-6 consumers want convenience not hassles. Businesses between 145<sup>th</sup> and 165<sup>th</sup> will be put at a direct disadvantage because businesses to the north will have open access by way of the two-way left-turn lane and so will business to the south. Can the City of Shoreline or the author(s) of the DEIS please disclose any studies or polling they did to establish what type of business would want to relocate to a highway where access and egress has been severely limited?

63-33

The bullet points under paragraph 4 on page 1-6 must be addressed. If it was the intent of the Comprehensive Plan to "balance vehicular, transit, and pedestrian needs" this proposed plan is in clear violation of that goal because it does not address the needs of all of the citizens of Shoreline. This plan does not address, or "balance vehicular, transit and pedestrian needs" for the entire Aurora Corridor. Will the City of Shoreline please explain why this is?

The City of Shoreline violates the goal and the spirit of LU VII because it will fail "in creating a 'sense of place' and improving image" for all of the citizens of the City by leaving 2/3 of the roadway unimproved. It would appear that this proposed project will only make SR 99 between North 165<sup>th</sup> and North 205<sup>th</sup> look worse than it does now. Business values and property values on the unimproved section of SR 99 will likely fall. The author(s) of the DEIS evade this very important issue. Would the City of Shoreline and the WSDOT please address this issue?

63-33A

Page 1-6 paragraph 4 bullet point speaks of "protecting neighborhoods". The proposed design does just the opposite. SR 99 through the City of Shoreline has a unique business district because for most intents and purposes it is only one business deep and then motorists enter into residential areas. The proposed plan by the City of Shoreline and the WSDOT would greatly reduce consumer's ability to access businesses because of the raised center median. Many drivers are not going to be comfortable with making a U-turn because a U-turn is foreign to them. Therefore these motorists will follow the rule-of-thumb that has been taught all drivers that three-rights-make-a-left which will put more



63-34 | cut-through traffic into the neighborhoods. Neither the City of Shoreline nor the WSDOT or the author(s) of the DEIS have addressed the neighborhood cut-through traffic problem. Why?

63-35 | Bullet point #4 on page 1-6 paragraph 4 cites "Encouraging businesses to thrive". Will the City of Shoreline or the author(s) of the DEIS please explain how reducing parking and severely limiting access and egress to businesses affected by this proposed project will help any business to "thrive".

63-36 | The final bullet point in paragraph 4 on page 1-6 speaks of "Using a strategy based on sound market principals". Can the City of Shoreline or the WSDOT name one business owner between North 145<sup>th</sup> and North 165<sup>th</sup> that had any active participation in the CATF or was involved in planning or design of the proposed "improvements" that will affect their business?

63-37 | On page 1-6 paragraph 6 states "the City's Transportation Element, the plan calls for striking a balance between mobility, congestion relief, (and) safety". Would the City of Shoreline please explain how a "balance" is being created between mobility, congestion relief, and safety with underground utilities, amenity zones, expensive planted medians, over-wide sidewalks, and excessive private property condemnation?

63-38 | Page 1-6 paragraph 6 speaks of "access to transportation alternatives such as transit, pedestrian". Can the City of Shoreline or the WSDOT supply any scientific data that a sidewalk regardless of size has any effect in reducing traffic congestion on a Federal Highway?

The Citizens Advisory Task Force (CATF) is referred in paragraph 7 of page 1-6. The DEIS states "A comprehensive study of corridor transportation concepts was conducted in 1999". It is purported that there were 13 meetings of the CATF yet there are minutes to only 4 meetings (exhibit 7). Is this what the City of Shoreline and the author(s) of the DEIS call "comprehensive"?

63-39 | According to the US Department of Transportation regarding Civic Advisory Committees (exhibit 7) "comments and points of view of participants are recorded". Can the City of Shoreline please explain why this was not done so that a proper record would be available?

The minutes of those 4 meetings (exhibit 8) show there was only one vote taken by the board members. How could the City of Shoreline, or the author(s) of the DEIS draw any conclusions from what records are available?

The minutes of the 4 CATF meetings (exhibit 8) have no public comments recorded even though visitors at the July 8, 1999 meeting were allowed to speak and present their viewpoints. Some of those views were against the proposal yet none were recorded. Can the City of Shoreline please explain why?

63-39  
CONT.  
According to the US Department of Transportation (exhibit 9) public involvement in the process by ethnic, minorities, and low-income groups in decision making is important. Some of the listed benefits are a "widened basis of consensus", "fresh perspectives", "give first-hand information about community-specific issues" among others. According to page 3-38 of the DEIS in the year 2000 the City of Shorelines had a "minority population of 22 percent". Would the City of Shoreline please advise if the board members of the CATF were as racially diverse as the community it was directing?

Would the City of Shoreline please explain what efforts were made to recruit minorities to be board members on the CATF?

63-40  
CATF was made up of very few business people. Ms. Terry Green represented the Shoreline Chamber of Commerce, not the Highland Ice Arena. Another business "owner" rented his property from another CATF board member. Mr. Chuck Olson was the only true business owner and board member. By WSDOT's own document "A Primer for Local Agencies on Access Management in Washington State (exhibit 10) CATF's recommendations for the Aurora Corridor should not be taken into consideration. It was the responsibility of the City of Shoreline to follow WSDOT's recommendations: "The backbone of almost every access management effort is public involvement. Property owners consider many access management applications a threat to them. They are more likely to cooperate if they are approached at an early stage of the process. They need to be invited to help solve a problem, not approve a proposal that agency staff has already developed". Why hasn't the WSDOT required the City of Shoreline to follow its own published recommendations?

If cities are not going to be required to follow WSDOT recommendations why bother having them at all, could the WSDOT please inform this reader why have them at all?

63-41  
During the review process by the CATF did the City of Shoreline make it clear to the board members that the board's final plan would only be built between North 145<sup>th</sup> and North 165<sup>th</sup> and that there was no money available in the future for extending their proposal between North 165<sup>th</sup> and North 205<sup>th</sup>?

Paragraph 7's last bullet point which is on page 1-7 states this design "Supports existing and future business investments along the street". If the raised center median concept is such an attraction for commerce, why has it failed in:

PORTLAND OREGON: (exhibit 11)

63-42  
In the 1970 Union Street in Portland Oregon was rebuilt with 4 lanes and a 10 foot center median was installed. Over the years there were a number of problems one of which was a poor perception of the planted median. "Though the median featured attractive landscaping, it created a physical barrier to pedestrians and felt more, to non-vehicle users, like a blockade than an inviting feature". "There was a perception in the racially-mixed community living on either side of its 3.5 mile stretch that the street had been rebuilt to rush white commuters through the diverse neighborhoods". In 1996

Governor John Kitzhaber got involved and 5 blocks of the median was removed. Matt Brown of Portland Office of Transportation states "it was difficult to convince some Oregon Department of Transportation Engineers about these changes". "Community benefits are now being revealed: property values are up, community-development activity is strong, and traffic moves at a main-street speed". The Lloyd Center mall which is adjacent to the Union Street (now Martin Luther King Way) development reports some mall shops have increased business by up to 70%.

#### SEQUIM WASHINGTON (exhibit 12)

Unfortunately some citizens and businesses don't get involved soon enough as shown in Sequim. 1900 citizens signed a petition for removal of planted medians in less than a week. The City Council was mobbed with angry tax payers and voters who did not want their turning movements impeded. "Carlsborg resident Milton Griffing said the medians have been detrimental to Lehman's Mark and Pak grocery store (sic) and Bank of America". Griffing also noted "We're your 30,000 neighbors who provide the trade dollars in this town adding the medians had made (it) easier to spend those dollars elsewhere".

#### ATLANTA GEORGIA (exhibit 13)

63-42  
CONT.  
"Atlanta's Memorial Drive, once a thriving area with restaurants, national retailers, and grocery stores lining the highway, now is struggling to overcome a blight that many blame on a 4.3 mile concrete divider. After the median was built in 1991 several businesses, including Chili's, Olive Garden, Kroger, Kmart, and Michaels moved out of the area". State Senator Rusty Paul "who remembers Memorial Drive before the median was built, said, "I've seen what that does to a business district when you limit access like that. It truly does rob business people of their investment". Mr. Steve Parks a former Georgia Department of Transportation deputy commissioner states that "medians are overused in Georgia". Georgia Senate Bill 49 was enacted 50-1 in hopes of deterring the Georgia DOT from over-building of medians.

#### FORT THOMAS OHIO (exhibit 14)

"A plan to reconfigure the business district, a proposal city leader's hope brings in new merchants and shoppers to the city's commercial core. During a nearly hour-long presentation on the plan at Monday night's meeting, City Administrator Jeff Earlywine repeatedly said the poles as well as the medians on the street need to be removed for aesthetic reasons".

#### GALESBURG ILLINOIS (exhibit 15)

63-42 While US highway 150 is being completely rebuilt as the pictures show the medians have been removed and "Bi-directional center lane(s)" are being installed. This is currently a work under progress as the photographs show.

CONT. Does the City of Shoreline really believe that the entrepreneurs, franchisees, and national companies they hope to lure to this city are so naive as to not know the damage raised center medians do to business?

63-43 The term BAT lane is introduced on page 1-7 paragraph 2 bullet point #1. These BAT lanes appear to be the creation of the WSDOT. The Federal Highway Administration, the National Highway Traffic Safety Administration, American Association of State Highway and Transportation Officials have no record of BAT lanes. These are virtually unknown on the internet and sound experimental. What data or studies can the WSDOT or the City of Shoreline provide that these lanes are safe?

63-44 According to Transit Cooperative Research Program (TCRP) report #26 on Operational Analysis of Bus Lanes on Arterials (exhibit 16) page 30 under 2.7.1 General Observations: The following impacts are associated with the provision of a single or dual bus lane: If the lane is used primarily by buses, the vehicle capacity loss would be relatively small. However, when the lane is introduced for relatively low existing bus flows (i.e. less than 40 buses an hour) the loss in vehicular capacity could be as high as 30 to 50 percent of one travel lane. Bus traffic through the Aurora does not account for 40 buses every 12 hours much less 40 each hour. If the goal is to alleviate congestion why doesn't the WSDOT make the "BAT" lane a general purpose lane?

TCRP report (exhibit 16) also states on page 27 under 2.5.1 "At 400 right turns per hour, bus lane capacity was reduced by almost two-thirds. Right turns in central business districts (CBD) commonly range from 100 to 200 vehicles per hour". Right turns appear to reduce bus lanes effectiveness in direct correlation. What statistical data can the City of Shoreline or the WSDOT offer to show that the added expense of building these lanes strictly as BAT lanes will do anything to help ease current of future congestion?

63-45 England has attempted the use of bus only lanes for many years. According to a government report by the Transport Research Laboratory reports (exhibit 17) "that reserving road space for public transport backfires by creating new gridlock that traps buses as well as cars". "Priority routes in town and city centres do little to reduce traffic volume-despite the promise of quicker, more reliable services". Senior Researcher Richard Balcombe states "Even if you do speed up the buses, you hardly ever make them an attractive alternative to the car". What research is available from the City of Shoreline or the WSDOT that shows that drivers commuting through this city will stop using their vehicle's and use the new BAT lanes and ride transit?

63-46 According to a report from the Florida Department of Transportation (exhibit 18) "Continuous right turn lanes have caused a number of problems on our highways". Will the City of Shoreline and the WSDOT please address the problems noted by the FDOT with lanes that for all intents and purposes are what is proposed for SR 99:

- 63-46  
CONT.
1. Drainage problems from too much impervious surface.
  2. Creating a wider road feel in our urban settings where we may be trying to create a more constrained roadway environment.
  3. Roadway aesthetics and pedestrian environment is compromised.
  4. Some drivers will use them as through lanes.
  5. Vehicles can get hit by vehicles traveling in them due to confusion of where they turn.
  6. Traffic queues develop and "good Samaritans" in two lanes let a driver in a left turn through to a property only to be hit by someone in the turn lane.

63-47

Page 1-7 of the DEIS 2<sup>nd</sup> paragraph third bullet point refers to a center median/safety lane. Is it the contention of the WSDOT, the City of Shoreline, or the author(s) of the DEIS that a raised center median could ever be conceived as a "safety lane"?

63-48

According to The Institute of Transportation Engineers Traffic Engineering Council (exhibit 19) "The primary disadvantage of a raised median, however, is that it often increases the amount of time and delay experienced by some left-turning traffic. Because a raised median forces left-turns to occur at established openings only, some left-turning motorists must travel circuitous routes to reach their destination. This can lead to undesirable turning movements (e.g. U-turns on roadways with insufficient width) and unwanted travel patterns (e.g. traffic entering neighborhoods). In addition, the raised median island can pose a potential safety hazard on streets serving high-speed traffic. If accidentally struck, a raised median could cause the driver to lose control of the vehicle". The DEIS does not discuss these potential dangers. Would the City of Shoreline please explain why not?

Page 1-7 paragraph the second bullet point 3 speaks of U-turn pockets. The state of California and British Columbia (exhibit 20) prohibit U-Turns in business districts except at traffic lights or intersections. British Columbia is very specific in describing a business district as "the territory of a contiguous to a portion of a highway having a length of 200 m (meters) along which there are buildings used for business, industrial, or public purposes occupying". British Columbia's definition is nearly identical to Washington State's RCW 47.04.010 (exhibit 21) if describing a "business district". It is obvious that the state of California and British Columbia have found that performing a U-turn on urban commercial highway is not a safe maneuver yet that is precisely what the City of Shoreline and the WSDOT proposes. Can the author(s) of the DEIS please provide any traffic studies that were utilized by the WSDOT and the City of Shoreline that provided evidence that these U-turn pockets are not more dangerous than the two-way left-turn lanes that currently exist?

63-49

Are the WSDOT and the City of Shoreline aware that the National Cooperation Highway Research Program, the American Association of State Highway and Transportation Officials, in conjunction with the Federal Highway Administration (exhibit 22) are currently investigating the safety of U-turns at unsignalized median openings?

63-49  
CONT.

Studies attributing safety gains to a non-traversable median have not focused on the specific situation of the median opening, either isolated or at an intersection, wherever U-turns occur". Are the City of Shoreline and the WSDOT aware that NCHRP states (exhibit 22) that "the impact of an increase in U-turns on safety of the road is not clear"?

This NCHRP report written with assistance from the FHWA and AASHTO (exhibit 22) will not be available until May 6, 2003. "The objectives of this report are to document the safety impacts of U-turns at unsignalized medians and to develop a guide for use, location, and design of unsignalized medians for U-turns". The design by CH2MHill is flawed because unproven, possibly unsafe median left turn lanes have been engineered into the proposed rebuilding of SR 99. Why would the WSDOT allow the City of Shoreline to even consider using unproven technology in its planning of the Aurora Corridor?

63-50

Page 1-7 paragraph 3 makes reference to "four new signalized intersections and four new pedestrian-activated signalized crossings". Is it the intention of the WSDOT and the City of Shoreline to have 7 traffic signals and 4 pedestrian-activated crossings between North 145<sup>th</sup> and North 165<sup>th</sup>?

63-51

On page 1-7 under GOALS AND OBJECTIVES of PROJECT it seems as if the author(s) of the DEIS or the City of Shoreline have forgotten that only 1 of the 3 miles of the Aurora Corridor will receive any of the funds available, with no funding in sight for the final 2 miles. Will the City of Shoreline please explain how this 1 mile project will "improve the economic development potential of the corridor" for the businesses that are located between North 165<sup>th</sup> and North 205<sup>th</sup>?

Staying with page 1-7 under "Goals" will the City of Shoreline please detail "the enhancement of livability for communities adjacent to the corridor" for the communities that exist both east and west of the Aurora Corridor between North 165<sup>th</sup> and North 205<sup>th</sup>?

63-52

Page 2-3 paragraph 1 speaks of High Accident Locations (HALS) and Pedestrian Accident Locations (PALS). Can the WSDOT provide statistics that show that HALS and PALS on other urban commercial highway's with a like-and-kind surrounding population and daily traffic counts as high as SR 99 through Shoreline that have appreciably lower accident rates?

According to Seattle and King County Public Health (exhibit 23) all of SR 99 in King County has more than 5 times the number of alcohol related crashes, and nearly 8 times the number of all crashes compared to other state highway (sic) in King County. Arguably Aurora has some of the heaviest traffic congestion in the state of Washington

which would account for higher accident rates than other King County highways. How does the City of Shoreline expect sidewalks, medians, amenity zones, more traffic lights, and underground utilities to get drunk drivers off the road?

63-53 Wouldn't the roads in the City of Shoreline be considerably safer with increased police protection to get the drunken drivers off the road rather than to build more roads for them to drive on and install more intersections to have accidents at? Would the City of Shoreline please respond as to what their priorities are?

It is interesting to note that the City of SeaTac has raised center medians along SR 99, along sidewalks and amenity zones yet they still have one of the highest alcohol related accident and injury rates (exhibit 23). Can the WSDOT explain why the road improvements haven't made the road safer for motorists?

63-54 State Farm Insurance Company keeps statistical data on "Washington's 10 Most Dangerous Intersections" (exhibit 24). None of those intersections are located in the City of Shoreline. WSDOT's most current accident statistics (exhibit 25) show accidents on the decline on SR 99 through Shoreline reducing the number of accidents to a point where the roadway is not on the WSDOT's top 72 statewide locations for accidents. Despite these facts the author(s) of the DEIS on page 2-3 paragraph attempt to paint a grim picture of the safety of the roadway. Would the City of Shoreline please address their intent to mislead the reader of the DEIS?

63-55 Page 2-3 table 2-1 is extremely deceptive to the reader and should not be allowed in the final EIS. The accident rate in the section of North 145<sup>th</sup> and North 155<sup>th</sup> has always been high only because of the placement of the McDonalds Restaurant and North 152<sup>nd</sup>. The accident rate is high because customers that patronize McDonalds Restaurant and residents on the east side of SR 99 are allowed to make left turns to access the highway. Is it not true that even though there are a high number of crashes at that site, that because they are nearly always just "fender-benders" that neither King County, the WSDOT, or the City of Shoreline was willing to put in a short restrictive median to prevent these left turns?

Page 2-3 under the heading "LOGICAL TERMINI" North 145<sup>th</sup> and North 165<sup>th</sup> are named as the most logical streets to start and end this proposed project. North 145<sup>th</sup> is an east-west 35 mph arterial with 4 lanes and sidewalks, has no adjacent driveways and certainly would be considered "logical". North 165<sup>th</sup> is, however, nowhere near a "logical" termini. North 165<sup>th</sup> is a 2 lane residential street that measures just 20 feet wide which travels east of SR 99 less than a block. Westbound where North 165<sup>th</sup> intersects with Linden Avenue North the roadway becomes a steep hill which ends in about 1/4 mile at a 5-way stop intersection. The hill that begins on North 165<sup>th</sup> at Linden Avenue North creates a dangerous blind spot for motorists driving both east and west. There are no sidewalks on North 165<sup>th</sup> and it has a posted speed limit of 25 mph. Homeowner's driveways on North 165<sup>th</sup> abut the roadway. Installing a traffic signal on SR 99 at North 165<sup>th</sup> will turn this residential street into a de facto arterial. Shoreline Community College generates a great deal of traffic that is now forced to use signalized North 160<sup>th</sup> to travel

63-56 northbound. North 160<sup>th</sup> has 4 lanes, sidewalks, and a 35 mph speed limit. Is it not apparent to the City of Shoreline and the WSDOT that a traffic light at North 165<sup>th</sup> and SR 99 will encourage cut-through traffic from the college which is not acceptable for this residential area?

63-57 North 165<sup>th</sup> is already heavily burdened by cut-through traffic as noted on page 2-3 Table 2-1. If the reader is to believe the table 600 cars just "appear" at North 165<sup>th</sup> then 4600 cars just "disappear at North 160<sup>th</sup>". Wouldn't the traffic count indicate that North 155<sup>th</sup> would be the first choice as the logical termini, with North 160<sup>th</sup> as a distant second?

63-58 If the author(s) of the DEIS, the WSDOT, or the City of Shoreline was at all serious at using North 165<sup>th</sup> as the "logical termini" why is there no environmental review of the impacts this would have on the local community?

63-59 Paragraph 4 on page 2-4 the author(s) of the DEIS state s that improvements associated with the project "would provide independent utility regardless of whether or not additional improvements were made elsewhere along the corridor". Using North 165<sup>th</sup> as the "logical termini" as an example it is agreed this proposed project is just under a mile. A chicane effect would be created at North 165<sup>th</sup> where buses and motorists unfamiliar with the area that have inadvertently pulled into the BAT lane will be trying to merge with faster moving center-lane traffic. Can the City of Shoreline or the WSDOT please explain how this chicane effect will not cause more accidents and more congestion?

The DEIS speaks of pedestrian safety on page 2-4 paragraph 3. Clearly this proposed project has nothing to do with pedestrian safety. Would the author(s) of the DEIS and the City of Shoreline please detail why there is:

- 63-60
- A. No pedestrian traffic counts available between North 145<sup>th</sup> and North 165<sup>th</sup> in the DEIS?
  - B. No pedestrian traffic counts cited on like-and-kind urban commercial highway projects similar to SR 99 with a preconstruction pedestrian count and a post-construction pedestrian count listed in the DEIS?
  - C. No statistical data on the frequency of pedestrian fatalities between North 145<sup>th</sup> and North 165<sup>th</sup> in the DEIS?
  - D. No statistical data on the frequency of injuries suffered by pedestrians between North 145<sup>th</sup> and North 165<sup>th</sup> in the DEIS?
  - E. No data as to the contributory negligence of the pedestrians or motorists if in fact there have been incidents of injuries or deaths of pedestrians on SR 99 from North 145<sup>th</sup> to North 165<sup>th</sup> in the DEIS?
  - 63-61 F. No data supplied as to exactly how much time will actually be saved by each bus over this 1 mile of road keeping in mind the roadway currently is fitted with traffic light priority timing devices?



63-62 On page 2-4 the last paragraph the author(s) of the DEIS again attempt to mislead the reader. For the author(s) of this DEIS to compare the Edmonds-Lynnwood projects to this one is laughable. The Governing bodies in Edmonds and Lynnwood had the best interest of all of their citizens and spent the funds that were available to give everyone some safety improvements on SR 99 through their towns, not just a chosen few. The projects in Edmonds-Lynnwood on SR 99 were governed by the parameters set by the local governments as will the project in Seattle. The 3 miles of SR 99 through the City of Shoreline will have to be built to the unrealistic parameters set not only by the City of Shoreline Comprehensive Plan, but by the City's Building Code as well. As the codes are written today any future construction on SR 99 between North 165<sup>th</sup> and North 205<sup>th</sup> will in fact have to be identical to what is built between North 145<sup>th</sup> and North 165<sup>th</sup>. Why have the authors of the DEIS ignored this important fact and indicate otherwise?

63-63 On page 2-5 paragraph 1 makes reference to other roadway projects along SR 99 through Tukwila, SeaTac, Des Moines, and Federal Way. It would seem only fair that the author(s) of the DEIS, since they made references to those projects, would supply the reader with cost comparison analysis' of the City of Shoreline project compared to the other city's projects (exhibit 26) What was the motivation of the City of Shoreline and the author(s) of the DEIS to leave this pertinent information left out?

63-64 The last paragraph of page 2-5 makes reference to 2 advisory groups, one the previously mentioned CATF and Interagency Technical Advisory Committee (ITAC). Who were the members of the ITAC and who did they work for?

63-65 There was a third citizen's advisory board which was called Comprehensive Plan Advisory Committee (CPAC) which has been omitted by the author(s) of the DEIS. Why was this committee omitted by the author(s) of the DEIS?

63-66 Page 2-6 paragraph 1 speaks of "alternatives that were considered, but rejected, include the following" which does not include the very detailed proposal presented by the Aurora Improvement Council (AIC), The Shoreline Merchants Association (SMA), and the Concerned Citizens for Shoreline (exhibit 27). Why was the proposal for rebuilding SR 99 through Shoreline presented by these groups given proper consideration and comparison to Alternatives 1, 2 and 3 by the author(s) of the DEIS?

63-67 It would appear that the author(s) of the DEIS are not familiar with the roadway system in the City of Shoreline. Page 2-7 paragraph 2 refers to Alternative 1 "was also expected to shift substantial traffic volumes to parallel routes, including Meridian Avenue, Fremont Avenue, and Dayton Avenue". Considering that it dead-ends 1 1/2 blocks off of North 145<sup>th</sup>, begins again at North 160<sup>th</sup> and ends 1 block in when it meets North 161<sup>st</sup>. Would the City of Shoreline and the author(s) of the DEIS please explain in what manner could Fremont Avenue be expected to receive "substantial volumes of traffic" through the proposed project area?

63-67

CONT.

Fremont Avenue then begins again at North 163<sup>rd</sup> and continues north. Is it not a fact that proposed project termini is slated to be North 165<sup>th</sup> with a controlled intersection the author(s) of the DEIS would be correct that Fremont Avenue can expect "substantial volumes of traffic" because a traffic light will make Fremont an attractive cut-through route to commuters? Would the author(s) of the DEIS and the City of Shoreline please address this issue?

63-68

Paragraph 5 on page refers to "evaluation results and public input" and references Chapter 6-yet there is no Chapter 6 in the DEIS. Is there an omission of documents in the DEIS or is this another error that should direct the reader to Chapter 4?

63-69

On page 2-8 under 5' SIDEWALKS the author(s) of the DEIS fail to educate the reader that a 5 foot sidewalk is all that is required under the Americans with Disabilities Act (ADA). What was the motivation by the City of Shoreline and the author(s) of the DEIS in leaving this important fact out?

63-70

Under that same section of 5' SIDEWALKS on page 2-8 the author(s) of the DEIS make the statement "No additional signals are provided to allow safe pedestrian crossings. Therefore, this alternative would not substantially enhance pedestrian access and would not help reduce the number of crashes involving pedestrians". What studies can the City of Shoreline, the WSDOT, or the author(s) of the DEIS provide that pedestrians will take the extra time and effort to utilize such facilities?

63-71

Paragraph 1 on page 2-14 refers to the addition of dual left-turn lanes northbound at North 160<sup>th</sup> and dual left-turn lanes southbound at North 155<sup>th</sup>. Isn't the City of Shoreline, the WSDOT, and the author(s) of the DEIS aware that these dual left-turn lanes currently exist today?

63-72

Page 3-11 under NO ACTION ALTERNATIVE the author(s) of the DEIS mislead the reader into believing that right turns are more dangerous at North 165<sup>th</sup> than with any other residential street that abuts SR 99. No accident data has been provided to the reader to show right turns from either street are anymore dangerous than a right turn from North 170<sup>th</sup> onto SR 99 yet the author's of the DEIS would have the reader believe otherwise. What is the motivation of the author(s) of the DEIS, or the City of Shoreline for this attempt at deception?

63-73

The last paragraph on page 3-11 states that "Alternatives A and B are not expected to have any adverse impacts on the highway system north or south of this project". A chicane effect will be created both north and southbound at North 165<sup>th</sup>. It only seems logical that since chicanes are used for traffic calming, buses and unaware motorists are going to get caught in the BAT lane creating unsafe merging back into the center lane and creating more congestion and accidents? What study data can the City of Shoreline or the author(s) of the DEIS offer to substantiate this statement?

63-74

On page 3-12 again the author(s) of the DEIS offer an apples-to-oranges comparison in paragraph 1 and Table 3-5. The noted paragraph and illustrated table are simply fact

63-74  
CONT.  
less and again appear to be another attempt by the author(s) of the DEIS to deceive the reader. It is not possible to compare LOS on three arterials, North 145<sup>th</sup>, North 155<sup>th</sup> and North 160<sup>th</sup> that intersect SR 99. North 152<sup>nd</sup> does not directly continue as a through street on the west side of SR 99, and North 165<sup>th</sup> travels barely a block on the east side of SR 99. Since neither North 152<sup>nd</sup> nor North 165<sup>th</sup> are even actual through streets, much less arterials giving them LOS numbers and comparisons to the other intersections are nothing short of pure deception. The author(s) of the DEIS are very aware of this fact because they entered >100 as the Vehicle Delay on Table 3-5 under the No Action Alternative, but entered 12 and 14 respectively for the Build Alternatives to artificially lower the Corridor Average. When the artificial numbers are correctly removed from both sides of Table 3-5 the Corridor Averages on the No Action side remain at 87.3, but the average increases on the Build Alternatives to 83. Tables such as 3-5 on page 3-1 would make it appear that the author(s) of the DEIS are not impartial. Since the author(s) appear to be CH2Mhill which is also the design company for the project(s) that the DEIS has been deliberately written in a pro-project manner rather than in an honest of the environmental impact that these proposed projects. Would the City of Shoreline and the WSDOT please respond to what appears to an inappropriate conflict of interest by the author(s) of the DEIS?

63-75  
On page 3-13 the last paragraph states "crash experience would be expected to worsen". Would the author(s) of the DEIS or the City of Shoreline please provide what data was used to make this statement?

63-76  
Still referencing page 3-23 under the last paragraph the DEIS comments "The total number of crashes per year would be higher than existing conditions". According to the WSDOT accident reports available for SR 99 through the City of Shoreline accident rates are on the decline despite increased traffic flows. This reader would ask what statistical data was used to give credibility to this statement?

63-77  
On page 3-14 under Alternative A the author(s) of the DEIS make the statement that the proposed Alternatives "would allow traffic to safely enter and exit the roadway" and cite "recent research" of Parsonson et al (1993) that overall crashes can be reduced by as much as 26 percent and property damage by as much as 40 percent. Once again the author(s) of the DEIS attempt to mislead the reader. Parsonson et al studied roadways with continuous raised center medians that did not have BAT lanes or U-turn lanes. Any reference to Pasosnson et al (1993) by the author(s) of the DEIS as to possible safety advantages of the proposed projects by the City of Shoreline is just another attempt to misdirect the reader with apples-to oranges comparisons. Would the author(s) of the DEIS explain why they chose to cite studies that are nearly a decade old when more current data such as the Florida Department of Transportation no longer recommends BAT type lanes, and the safety of U-turn lanes is now under scrutiny?

63-78  
On page 3-14 under No Action Alternative the author(s) state "Aurora Avenue would continue to be an unsafe and uncomfortable environment for pedestrians". What scientific pedestrian or transit-users polls were used by the City of Shoreline or the author(s) of the DEIS to substantiate this biased comment?

63-79 Would the authors of the DEIS please explain what scientific methodology was used to establish that when provided with a choice to travel north or south in the City of Shoreline would pedestrians prefer walking next to a highway on any type of sidewalk or along the soon to be built Interurban Trail?

Page 3-14 under No Action Alternative the author(s) of the DEIS make another very dubious comment stating "Crashes involving pedestrians would increase due to the lack of adequate crossing opportunities". Would the author(s) of the DEIS, the City of Shoreline, or the WSDOT please explain:

- 63-80
- A. What research was used to establish pedestrian travel rates between North 145<sup>th</sup> and North 165<sup>th</sup> on SR 99 with the addition of the Interurban Trail?
  - B. Both the east and west side of SR 99 between North 145<sup>th</sup> and North 165<sup>th</sup> has paved shoulder areas. What data can be supplied that a paved shoulder is less safe than a 5 foot sidewalk or an 8 foot sidewalk?
  - C. What studies were used that indicates pedestrians will take the time and trouble to go out of their way to use legal pedestrian crossings?
  - D. Is the City of Shoreline aware it is legal to jaywalk in the city?

Page 3-15 paragraph 2 makes reference to a 4-foot-wide landscaped amenity zone and claims it "would provide as an additional benefit to pedestrian safety. This reader would believe that the main danger to a pedestrian is a motor vehicle (automobile, truck, bus, etc.) that is out of control. Would the author's of the DEIS please substantiate their claim that additional pedestrian safety is offered by a landscaped amenity zone, and scientific data to back up their contention?

63-81 On page 3-16 paragraph 1 states that enhanced bus zones and bus shelters "could potentially mean that there would be 30 to 35 fewer vehicles on the road". Would the author(s) of the DEIS please disclose as to whether or not this estimated increase in riders was supplied by any qualified local transit organization?

63-82 The last paragraph on page 3-16 speaks of median openings at major truck access points. It goes on to state "The openings will be designed to accommodate a WB-55 design vehicle". According to the Roadway Design Manual (exhibit 28) a single unit truck design vehicle will require 12.8 meters to complete a U-turn which would seem to indicate that proposed design's Alternatives A and B would leave insufficient roadway for driver's to complete a U-turn maneuver. Would the author(s) of the DEIS please supply documentation to substantiate their claim?

63-83 On page 3-17 under SECONDARY and CUMULATIVE IMPACTS would the author(s) of the DEIS or the City of Shoreline please explain what scientific data was used to substantiate their claims that:

- A. Even though driveways will be reduced, parking eliminated, a restrictive raised center median installed that there will be "additional access".

- 63-83  
CONT.
- B. The author(s) admit that "might make Aurora Avenue North a more attractive business and / or residential location that just the opposite could happen. Too many intersections and restrictive access and egress may drive businesses away, and cut-through traffic may drive out residents. Will the author(s) please respond to this alternate possibility?
  - C. The author(s) make many references to "transit oriented" businesses and "mixed use" businesses. Please in detail define these types of businesses.

63-83A

The author(s) of the DEIS on page 3-17 in the last paragraph do nothing more than to engage in cheap scare tactics in an attempt to frighten the average reader of this document with information which they do not substantiate. This reader of the DEIS has presented WSDOT documents that prove that SR 99 through Shoreline in fact does not crash rates "among the highest in the state for an arterial of its type". This constant repeating of errorneous information by the author(s) of the DEIS is just more proof that either they are not an impartial group to make a true assessment, or they are in fact quite incompetent. Will the author(s) of the DEIS please detail which category they fall into?

63-84

Page 3-18 paragraph 2 reads "The design of the build alternatives-by adding traffic capacity, non-motorized amenities, and transit facilities-includes mitigation of secondary impacts and will help future development attain transportation concurrency". In order to be "concurrent" this statement would indicate that the information on page 2-4 in the last paragraph is false. Would the author(s) of the DEIS please explain their inconsistent viewpoint?

Page 3-15 in the last paragraph cites that "transit speed and reliability would deteriorate as traffic congestion continues". It seems as if the author(s) of the DEIS again attempt to deceive through omission. Please Detail:

- 63-85
- A. Of the \$30,000,000.00 being devoted to this project how much money is being paid by local transit authorities?
  - B. Why is the number of transit buses traveling between North 145<sup>th</sup> and North 165<sup>th</sup> each day which is omitted from the DEIS?
  - C. What is the current number of bus passenger's that leave from bus stops between author(s) North 145<sup>th</sup> and North 165<sup>th</sup> and why isn't that number in the DEIS?
  - D. The transit timing devices that have been fitted to current intersection signals will save time and alleviate much of the queuing effect out of loading buses. This fact has been omitted from the DEIS, why?
  - E. Transit buses have the right-of-way over other passenger vehicles so there is no extended wait for them to reenter traffic. Why did the author(s) of the DEIS leave exclude disclosure of this law?

63-86

On page 3-18 Table 3-8 shows, if one is to believe the author(s), is a bit confusing for the reader of the DEIS. According to Table 3-5 under Build Alternatives if North 165<sup>th</sup> gets a traffic signal its LOS becomes a "B" with a Vehicle Delay of 49 seconds. Then when the reader reviews Table 3-8 North 205<sup>th</sup> with a Delay of 30.5 seconds receives only "C" LOS. Will the author(s) of the DEIS please explain the disparity in ratings?

63-87 The last paragraph on page 3-18 speaks of cut-through traffic and that the City will "monitor traffic volumes" and that "traffic control measures will be taken". Will the City of Shoreline please address:

- A. How many people will be injured or killed before action will be taken on any particular street?
- B. How does the City of Shoreline plan to pay for such traffic calming measures?

63-88 On page 3-19 under Cumulative Safety Impacts the author(s) of the DEIS again attempt to use outdated studies that did not incorporate experimental designs such as BAT lanes and U-turn lanes. The author(s) again are clearly attempting to use fear for the unknowing reader of the DEIS by repeating this misleading information. This reader would ask the WSDOT and the FHWA to strike any mention of Parsonson et al from any final document.

63-89 On page 3-19 is Table 3-9. Would the author(s) of the DEIS please disclose their intent by showing a prognostication of LOS between North 165<sup>th</sup> and North 205<sup>th</sup> based on improvements that are not part of the proposed roadway project on SR 99 between North 145<sup>th</sup> and North 165<sup>th</sup>?

63-90 The introduction of Table 3-9 on page 3-19 can only serve to confuse the reader of the DEIS creating an image that a full project is planned between North 145<sup>th</sup> and North 205<sup>th</sup> which is inappropriate. Based on the actual scope of the proposed project Table 3-9 should be stricken from any future document.

63-91 Page 3-20 paragraph 1 states "Aurora Avenue lacks a signalized crossing opportunity for pedestrians between North 160<sup>th</sup> and North 170<sup>th</sup>". Would the author(s) of the DEIS please recant this statement as it is blatantly false?

63-92 Paragraph 2 of page 3-20 speaks of "future improvements along the Aurora Corridor from North 165<sup>th</sup> Street to North 205<sup>th</sup> Street". This statement by the author(s) of the DEIS is counter to their earlier statement on page xxiii paragraph 3 "there is no certainty regarding if or when additional funding will become available". Would the WSDOT please address the fact that the City of Shoreline and the author(s) of the DEIS continue to attempt to mislead the reader of this document with misleading and contradictory contradicting statements?

63-93 Paragraph 3 of page 3-20 repeats the statement "Enhancing transit features along Aurora would encourage more transit use by commuters and each bus trip could remove 30 to 35 vehicles from the road". The Bibliography and References pages of the DEIS do not list any transit Authorities. Will the City of Shoreline and the author(s) of the DEIS please disclose the expert source consulted to determine the authenticity of these twice repeated numbers?

If no expert authority provided the numbers used by the author(s) of the DEIS in paragraph 3 on page 3-20 then why would any numbers be used at all because "pumped-up" numbers definitely mislead the reader into believing that the environmental impact from the project on SR 99 would be much greater than it is?

Paragraph's 5 and 7 on page 3-20 continue to mislead the reader into believing that future construction will occur on SR 99 from North 165<sup>th</sup> to North 205<sup>th</sup>. The City of Shoreline knows there are no funds in the foreseeable future and so does the WSDOT yet just like a broken record the author(s) of the DEIS keep bringing up this stretch of roadway that will not be improved now and quite possibly never will be because of the current pressing transportation needs and lack of funding in the entire State of Washington. The author(s) of the DEIS have spent too much time addressing 2 miles of SR 99 that will receive no improvement. Will the WSDOT please find out who directed them to do so?

63-94  
Paragraph's 5 and 7 on page 3-20, and as do many other references by the author(s) of the DEIS link together the full 3 mile stretch of SR 99 through Shoreline. Either these references are being made to mislead the reader as stated previously. Or, the continued references to the two projects by the author(s) of the DEIS as if both projects will be completed may be a subconscious suggestion that there is really only 1 project which is between North 145<sup>th</sup> and North 205<sup>th</sup> and the DEIS should really be completed for the full 3 miles. Would the WSDOT, the FHWA, and the City of Shoreline please address this issue?

63-94A  
63-95  
The proposed rebuilding of SR 99 between North 145<sup>th</sup> and North 165<sup>th</sup> lies between 2 very fragile wetland areas. There is Boeing Creek to the west and Thornton Creek and Twin Ponds to the east. Traditionally wetlands have paid the price for mistakes in the planning and engineering of construction projects and road-building projects. Because there seems to be little or no funds to correct environmental errors after the fact does it not behoove the WSDOT and the City of Shoreline to do it right the first time and complete a full Environmental Impact Statement rather than just an Environmental Assessment?

On page 3-22 under CONSTRUCTION STAGING PLAN seems to be poorly thought out by the author(s) of the DEIS with generalities and them deliberately ignoring the obvious. Would the City of Shoreline, the WSDOT, or the author(s) of the DEIS please explain:

- 63-96
- A. What is a "tolerable impact on the local economy and services"?
  - B. Who sets the standards for the above question?
  - C. In bullet point 2 the author(s) of the DEIS seem unaware that SR 99 is in fact a "high-volume route", why don't they know that SR 99 is a high-volume route?
  - D. The proposed roadway project is only 1 mile long. Can the author(s) of the DEIS please provide what circumstances might force motorists to detour the project "less than 10 miles" or anywhere near that far?

63-96

CONT.

- E. What route do the author(s) of the DESI or the City of Shoreline propose to use if detours are necessary?
- F. Who will decide what is a "major controversy" or an "adverse impact to the neighborhoods"?
- G. Shouldn't any "Substantial environmental impacts" be listed in the DEIS and known prior to the start of construction?
- H. What Substantial right-of-way clearance problems are anticipated" and why are they not detailed in the DEIS?

Page 3-23 paragraphs 2 and 3 make reference to "Temporary access revisions would be well marked" and signing during construction "that identify business". Will the authors of the DEIS or the City of Shoreline please detail:

63-97

- A. Who will make these signs?
- B. How large will they be?
- C. What will they be made of?
- D. Will new ones be made if the property owner/business owner feels what has been supplied is inadequate?

On page 3-26 the author(s) of the DEIS in paragraph 3 state "There is a preponderance of automobile-related businesses". Would the author(s) of the DEIS please detail what makes a "preponderance" level of automotive-related businesses and what makes an acceptable level, and what scientific test they are using to determine the answers?

63-98

Were the author(s) of the DEIS at any time instructed to use such negative connotations such as "preponderance" as used in paragraph 3 on page 3-26 by any outside source?

Would the fact that 1 in 7 employed people in the United States are employed in automotive-related jobs alter the author(s) of the DEIS position on their poor choice of words when the stated goal on page 1-2, last paragraph, by the City of Shoreline is to increase jobs on the entire 3 mile SR 99 corridor by 3300 by 2015?

63-99

On page 3-27 under the last paragraph under NO ACTION ALTERNATIVE The author(s) of the DEIS make the statement "The character of the housing would experience deterioration". Yet the author(s) state on page xix that the No Action Alternative would have no impact on regional and community growth". Would the author(s) of the DEIS please decide which statement they made is factual?

63-106

Pages 3-28 and 3-29 praise Alternative A and Alternative B. What they do not address is that neither Alternative A nor B is environmentally friendly. According to the Nonprofit Education for Municipal Officials Technical Paper #8 (exhibit 29) "Developers often install pavement far exceeding "minimum" standards. The over-paving of the developed landscape has well documented consequences". Adding more than the ADA



63-100  
CONT.

mandated 5' sidewalk is for aesthetic reasons, not safety, and it is not environmentally friendly. Why haven't the author(s) of the DEIS addressed this?

63-101

SR 99 from North 145<sup>th</sup> to North 165<sup>th</sup> has thousands of small cracks in the paved-roadway that catch and absorb water. The same is true of the graveled areas of the shoulders of the. Will the City of Shoreline, the WSDOT, or the author(s) of the DEIS please supply scientific data available to determine how much of the water is currently absorbed through the roadway and shoulders of SR 99 from North 145<sup>th</sup> and North 165<sup>th</sup> and slowly introduced into the ecosystem, and how much will be generated with a new wider roadbed under both Alternative A and B?

Page 3-30 again repeats the position that Alternative A would "improve access to business". Under Alternative A some driveways will be shared by businesses creating congestion in access openings. There is currently a right-turn lane so the BAT lane will add nothing. Businesses will lose the two-way left-turn lane making it far more difficult for customers to patronize their establishments. Would either the City of Shoreline or the author(s) of the DEIS please explain this unbelievable contention?

63-102

Paragraph 4 on page 3-30 claims "Alternative B would be beneficial because it would enhance commercial development along Aurora". Roadway improvements do not guaranty commercial viability or development as seen on Atlanta's Memorial Drive and Portland's Union Street. The author(s) of the DEIS have a responsibility to present true information not guesses. Will the City of Shoreline or the author(s) of the DEIS disclose what factual data this statement is based on?

63-103

Page 3-30 the last paragraph and page 3-31 paragraphs 1 and 2 along with Table 3-10 are inappropriate additions to this DEIS. The author(s) of the DEIS seem to drift back and forth between what has been deemed two separate projects. No roadway work is planned between North 165<sup>th</sup> and North 205<sup>th</sup> and by the City of Shoreline's own admission there may never be improvements made on this section of SR 99. It seem clear that there is an ulterior motive by the author(s) of the DEIS to keep referring to the two projects as if both may be reality. Who is behind the author(s) misrepresentation of the scope of the DEIS?

63-104

On page 3-40 under Construction Impacts does not list vibration and possible damage to adjacent properties. Why have the author(s) of the DEIS not included vibration as an impact of construction?

This reader has been employed on SR 99 for 25 years. I have personally witnessed literally hundreds of Police vehicles, fire trucks, EMT units, and ambulances race up SR 99, often using the two-way left-turn lane to quickly get to an emergency. These emergency vehicles, as they should, travel well over the posted speed limit. None of the north-south arterials in Shoreline can provide the quick access community-wide like SR

99 can for emergency vehicles because the arterials will not accommodate the high speed needed for fast response times. For Mr. Mehlert and Ms. Orndorf to believe response times won't be lengthened is like a commuter believing that a detour won't increase his commute time. The City of Shoreline owes its citizens more of an explanation when the Police and Fire Chief believe that they can defy the law of time-and-travel. Would the City of Shoreline please offer an explanation of the comments of these two public officials that doesn't sound coerced like the one they have already offered?

Page 3-43 cites Fire Chief Mehlert in paragraph 4 as speaks of problems that the raised center median would have in response times. Would either Chief Mehlert, the City of Shoreline please explain how much time is not "considered substantial when a business is on fire with employees still in the building"?

Police Chief Orndorf is quoted on page 3-43 paragraph 4 as stating "Therefore, the median on Aurora Avenue North would not negatively affect the provision (response times) of this service. If that statement is factual would the City of Shoreline please explain why it is common practice for Shoreline City Police to use the two-way left-turn lane in what appear to be emergencies because they are traveling at high rates of speed with lights flashing and sirens on?

63-105 | The last paragraph on page 3-45 continues onto page 3-46 paragraph 1. The DEIS states "However, based on the preliminary median design, access to some properties for emergency vehicles would be slightly less direct, thus increasing response times". This reader of the DEIS would believe most impartial reviewers of this proposed project would agree that there is no question that a raised center median will increase police and fire response times and therefore would this to be a true and factual statement. Yet it is counter to statements purportedly written by both Chief Mehlert and Chief Orndorf and quoted by the authors of the DEIS. Would the City of Shoreline or the authors of the DEIS please explain the disparity?

63-106 | On page 3-46 under ENVIROMENTAL JUSTICE the author(s) of the DEIS state "this analysis concludes that no high and adverse human health or environmental effects of the proposed project are expected to fall disproportionately on minority or low-income populations". Would the authors of the DEIS and the City of Shoreline please address the fact that 1/3 of all the businesses between North 145<sup>th</sup> and North 165<sup>th</sup> are minority owned and will suffer great impacts because of the construction and the raised center median?

63-107 | The last paragraph on page 3-47 states "Wider sidewalks would minimize conflicts between pedestrians and bicyclists". Would the author(s) of the DEIS please explain what scientific study was relied upon to make this claim?

63-108 | The New Jersey Department of Transportation (NJDOT) patterned their guidelines on bicycle paths after AASHTO's recommendations. According to NJDOT guidelines

63-108

CDHT.

"sidewalks are typically designed for pedestrian speed and maneuverability and are not safe for higher speed bicycle use". Yet the City of Shoreline believes that bicycles and pedestrians are compatible with each other. Would the City of Shoreline please disclose what studies or scientific data it used to reach the conclusion that bicycles and pedestrians are compatible on any sidewalk?

63-109

On page 3-55 in the last sentence of paragraph 2 the author(s) of the DEIS state "Some businesses might experience a temporary increase in revenues from purchases by construction workers". Would the author(s) of the DEIS please supply scientific data to substantiate this claim?

63-110

Paragraph 5 on page 3-55 speaks of "business owners might decide to move from the area if customers are not able to access their stores or if the movement of goods and services is restricted". Would the City of Shoreline and the author(s) of the DEIS please address the fact that this statement could just as easily be made about a highway after construction that has a restrictive raised center median?

63-111

On page 3-56 paragraph 2 the author(s) of the DEIS state "Conversely, access to many businesses along Aurora Avenue North might be less desirable during operations because of the removal of left-turn lanes". The author(s) go to state "This might impact businesses on the opposite side of the street that rely on impulse purchases because customers might decide to frequent competitors that are located on the same side of the street". The author(s)' statements are logical. Yet earlier in the DEIS the author(s) on page 3-30 paragraphs 3 and 4 make the claim that Alternatives A and B would "enhance commercial development along Aurora Avenue North". Would the author(s) of the DEIS please clarify there position?

63-112

Throughout the DEIS the author(s) continuously make reference to reducing congestion, increasing traffic flow etc. Will the author(s) of the DEIS please supply what studies were used to reach the conclusion that this 1 mile project will address any of those issues?

According to the Texas Transportation Institute (TTI) study titled Easing the Burden (exhibit 31). The Seattle-Everett area was part of that study. According to that study "TTI's data show that places that have built the most roads haven't had much success in slowing growth in congestion". Would the City of Shoreline, the WSDOT, and the author(s) of the DEIS please address some of the findings of that study:

- A. "Residents in the high road-building metro areas average 32 hours of delay annually, nine more hours than the low road-building areas (23 hours)".
- B. "Looked at over time, the metro areas in the high road-building group had no more success in keeping congestion from getting worse than the areas that added the least road space".
- C. "In the last decade, road space per person grew by 17 percent in the high-road-building group, and dropped by more than 13 percent in the low road-building group. Yet both experienced essentially the same increase in both the Travel

Index and Annual Hours of Delay. Population growth was not a confounding factor in this analysis; in fact, the average population growth for the low road-building group was actual slightly greater than the high road-building group”.

- D. “One of the reasons that road-building shows disappointing results in easing congestion are that adding capacity to highways doesn’t just meet the current demand: it actually spurs additional driving. When a road is widened more people will choose to drive on it-either switching from another route, time of day, or mode, or taking additional trips. Transportation engineers and planners call this ‘induced travel’”.

63-113 | Page 3-57 paragraph 4 refers to the property that will be lost at European Motors. The author(s) of the DEIS present an extremely deceptive view on the actual loss that of property this company will suffer. A good deal of “its parcel” is made up of buildings. The lost property is retail display space. The comparison used by the author(s) of the DEIS is akin to walling off 15 percent of a grocery store then adding the square footage of the parking lot so that it appears that only 2 percent of the store was lost. It is a basic rule of retail sales that you can’t sell from an empty shelf. Less property to display vehicles means a smaller inventory which will add up to fewer automobile sales. Exactly what methodology was used by the City of Shoreline or the author(s) of the DEIS to reach the conclusion that “the impact would be expected to be negligible” in regards to the property loss at European Motors?

On page 3-57 under PARKING for Alternative A is nothing more than an attempt by the City of Shoreline to bully the affected businesses should the proposed project be built. Why has the City of Shoreline taken this on this attitude?

63-114 | Pages 3-62 and 3-63 are again deliberate attempts to mislead the reader into believing that there will be “future improvements to Aurora Avenue North between North 165<sup>th</sup> and North 205<sup>th</sup>. The author(s) of the DEIS painting a picture of a project that even the City of Shoreline admits may never be built. Again this reader must ask what is the motivation of the authors of the DEIS in repeated attempts at deception in consistently referring to a project that is unfunded, may never be funded, and is out of the scope of the project that this DEIS should be covering?

63-115 | Page 3-72 under MITIGATION MEASURES lists a number of steps that are to be taken to assist in keeping construction pollution down. Will the author(s) of the DEIS please identify who will be responsible to see that in fact these measures are carried out?

63-116 | It is the fiduciary and moral responsibility of the City of Shoreline to maintain wetlands and watersheds that have existed for thousands of years. Page 3-91 indicates that it is the City’s plan to divert more runoff water to Boeing Creek than to Thornton Creek. Page 3-92 paragraph 1 reveals that Boeing Creek already a problem with storm water and that “retrofitted retention/detention ponds have lessened the impact of storm event flows”. Clearly the storm water problems have currently not been solved and the addition of more storm water runoff will only aggravate the situation. This appears to be

63-116

CONT.

a terrible environmental problem that has not been given proper attention. Would the City of Shoreline please provide current study data that addresses the full impact of this project on Boeing Creek?

63-117

Page 4-3 under COMMUNITY INVOLVEMENT that the "City of Shoreline has received and recorded more than 1300 public comments relating to potential improvements in the Aurora corridor". Will the City of Shoreline please detail how any 10 of those comments were used or acted upon that was not suggested or altered a suggestion from CATF?

63-118

The last sentence of 4-3 speaks of "fliers to assist the Korean business community members" that were left for the owners to read and keep abreast of the project. This sentence is under a caption that speaks of Property/Business owner meetings held in October 2000. The author(s) of the DEIS would lead the reader to believe that this is when the translated newsletters came out. According to some of the Korean business owners this did not happen until September of 2001. Would the City of Shoreline please clarify this issue?

63-118A

Both the City of Shoreline and the WSDOT believe that continuous raised center medians are the only safe alternative. Yet in other cities around the US raised medians have created a false sense of safety for pedestrians than will not take the time to go to a safe crossing. Highways in Queens New York, Fairfax and Alexandria Virginia Exhibits 32 & 33) fences had to be erected on the medians to deter pedestrians from crossing unsafely. Is the City of Shoreline willing to go to this extreme measure should the City get the same results as the previous mentioned towns?

63-119

Will the City of Shoreline please address who will maintain the amenity zones and planted raised center medians?

Would the City of Shoreline please address how often these areas will be, or are expected to be maintained?

Will the City of Shoreline please address the following questions in regards to the proposed project:

63-120

A. What types of fertilizers will be used in the landscaped areas?

a. What could be the negative short term effects of these fertilizers on plants, animals, fish, and humans because of their use?

- b. What could be the negative long term effects of these fertilizers on plants, animals, fish, and humans because of their use?
- c. What could be the negative effects, both long and short term to the watersheds and ecosystems?

B. What types of herbicides will be used in the landscaped areas?

- a. What could be the negative short term effects of these herbicides on plants, animals, fish, and humans because of their use?
- b. What could be the long term effects of these herbicides on plants, animals, fish and humans because of their use?
- c. What could be the negative impact both long and short term on the watersheds and ecosystems?

C. What type of pesticides will be used in the landscaped areas?

- a. What could be the negative short term effects on plants, animals, fish and humans because of their use?
- b. What could be the negative long term effects be on plants, animals, fish and humans from their use?
- c. What could be the long and short term effects to the watersheds and ecosystems?

Will the City of Shoreline please address the following issues:

- A. What erosion control measures will be used during the construction phase?
- B. Who will be responsible to monitor erosion control?
- C. How will storm water runoff be treated?
- D. If detention ponds are built what volume of water are they designed to hold?
- E. If detention ponds are built what volumes of water are they designed to treat?
- F. If detention ponds are built who will maintain them?
- G. If detention ponds are built how often will they be maintained?
- H. If detention ponds are built what will be their projected life span be?
- I. If detention ponds are built will they be able to:
  - a. Separate petroleum products from the water?
  - b. Remove sediment
  - c. Reduce nutrients that stimulate plant and algae growth such as nitrogen and phosphorus?
  - d. Remove toxic contaminants such as heavy metals, pesticides, and non-organic compounds like PCB's?

The Growth Management Act (GMA) (exhibit 34) along with RCW 36.70A.040 state that "governments adopting plans and regulations consider the goal of protecting private property rights". Would the City of Shoreline please explain how it is "protecting private

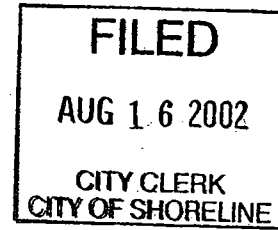
property rights by condemning property for large medians, extra-wide sidewalks and amenity zones from property owners it is suppose to protect?

Exhibit 34 also goes on to state "government entities are required to consider the impact of their actions upon private property rights. The failure to do so constitutes noncompliance with the requirements of the GMA". Would the City of Shoreline please explain to what extent they considered the impact of the proposed project on SR 99 on the people that own the land they wish to take?

63-124  
CONT.  
Further in exhibit 34 "the Growth Management Act lists the protection of private property rights as a goal in the development of plans and regulations". How has the City of Shoreline made the protection of private property rights a "goal" in considering this project?

The GMA also states there is to be "protection of property rights from arbitrary and discriminatory actions". Property owners on SR 99 through Edmonds and Lynnwood were not asked by their city governments to give up the tremendous amount of commercial property that the City of Shoreline is asking for. Neither is the City of Seattle asking the North Aurora Merchants for such large amounts of land. Would the City of Shoreline please explain why their proposed project and excessive land taking should not be judged as "arbitrary and discriminatory"?

**Log # 64**



*sm*  
*4:35 pm*

**QUESTIONS AND COMMENTS IN REGARDS TO THE  
ENVIROMENTAL ASSESSMENT and DRAFT  
ENVIROMENTAL IMPACT STATEMENT**

**Federal Highway Administration**

**Washington State Department of Transportation**

**City of Shoreline**

**Respectively submitted by:**

**Kevin S. Reeve  
17225 Aurora Avenue North  
Shoreline, Washington 98133**



August 8, 2002

Tim Stewart, AICP  
SEPA Responsible Official  
17544 Midvale Avenue North  
City of Shoreline  
Shoreline, WA 98133  
206-546-1508

Re: Draft Environmental Impact Statement, Aurora Corridor Project

Mr. Stewart,

64-1 The Shoreline Merchants Association does not support any of the three alternatives studied in the DEIS for the Aurora Corridor Project, as none of the alternatives addresses the needs of existing businesses.

64-2 SMA believes the DEIS is an inaccurate, incomplete and inadequate document in regards to the Aurora Corridor Project. The document does not address the impacts on our watersheds or fish and wildlife from water collected and then inadequately treated before being released into our streams. It also does not take into account the amount of water being directed to Boeing Creek from the \$1.8 million 3<sup>rd</sup> NW Drainage Project, which will expand the detention pond at this location.

64-3 Aurora Avenue North is only three miles long through the City of Shoreline. Each section of roadway will have environmental impacts on the rest of the Aurora Corridor, the surrounding neighborhoods and the City as a whole. Aurora Avenue should be studied as one, three-mile long project. Due to the cumulative environmental impacts of this project, it must have a NEPA/EIS prepared to ensure that all environmental impacts are studied as well as socio-economic impacts.

64-4 We believe CH2MHill has a conflict of interest in regards to the DEIS for the Aurora Corridor Project. CH2MHill is the design company for the Aurora Corridor Project. They also prepared all of the Discipline Reports that were then used to create the DEIS, which was also prepared by CH2MHill. It is in their best interests to make this project appear as if it does not have any environmental consequences or socio-economic impacts within the City of Shoreline.

64-5 The DEIS claims there will be no environmental impacts and misrepresents the monetary losses that will occur to businesses under either Alternative A or Alternative B. Business closures and loss of property and sales taxes will cause taxes to be raised across the board throughout the City of Shoreline to make up those losses. This is a major socio-economic impact that is not addressed in the SEPA/DEIS. The environmental document for this project must be a NEPA/EIS and must cover all three miles of the project.

We feel it was inappropriate for the City of Shoreline to schedule the DEIS hearing while the City Council was on hiatus. It was inappropriate to have the Planning Commission facilitate the hearing, as they are not involved in the decision making in regards to this project. It was unconscionable to hold this hearing on the same night as a national event that just celebrated its 19<sup>th</sup> year, Night Out Against Crime. This event encourages residents to have block parties in order to meet your neighbors. This would preclude many people from attending the hearing as the hearing was only recently scheduled.

64-8 | In the WSDOT document A Primer for Local Agencies on Access Management in Washington State, it states under the heading *Public Involvement and Education* "The backbone of almost every access management effort is public involvement. Property owners consider many access management applications a threat to them. They are more likely to cooperate if they are approached at an early stage of the process. They need to be invited to help solve a problem, not approve a proposal that agency staff has already developed."

Holding open houses does not constitute public involvement. The Comprehensive Plan Advisory Committee (CPAC) was public involvement, but the City Council chose not to hear the recommendations of the CPAC for the Aurora Corridor, the Interurban Trail and the City as a whole.

64-9 | The Citizens Advisory Task Force (CATF) was a hand-selected group that was not invited to "help solve a problem". Instead, the CATF was given three choices by city staff and then were told to choose between them. While some minor modifications were made to the selected "choice", when the CATF was debating sidewalk width, Mr. McKinley told them that the Comprehensive Plan required twelve-foot sidewalks along Aurora Avenue without ever mentioning that the Comprehensive Plan could be changed.

Equally disturbing is the fact that the City Council stated in October 1998 that five of the thirteen members of the CATF were to be business or property owners along Aurora Avenue. Only two business/property owners along Aurora Avenue were appointed. However, one was appointed strictly as the representative from the Shoreline Chamber of Commerce, meaning only one business/property owner from Aurora Avenue was appointed to the CATF.

64-10 | In plain talk, this means that property owners were not "...invited to help solve a problem..." We were not asked for help in designing any roadway improvements for Aurora Avenue even though we have a vested interest in and more at stake than anyone in the City of Shoreline in regards to this project. As individuals and as a group, suggestions we have made for less intrusive, more modest and less expensive improvements have been rebuffed, ignored or criticized by the Shoreline City Council and city staff. A plan created by the citizens and merchants of Shoreline would meet the goals of the Aurora Corridor Project as stated in the December 2001 issue of Aurora Corridor, "...improve safety, traffic flow and the economic vitality of Aurora's commercial

64-10  
CONT. area..." However, when the SMA asked to have this plan studied as part of the DEIS, Aurora Corridor Project we were told no by city staff.

64-10A A Value Engineering (VE) study<sup>2</sup> was performed on this project. The Transportation Improvement Board (TIB) paid for this study. When the SMA heard that this study was completed we repeatedly requested copies of the VE document beginning in June of 2001. We were told the document did not exist. At a May 23, 2002 meeting when Transportation Secretary Doug McDonald was present, a city staff member appeared with the VE study. We were finally able to obtain a copy of this document the following week, nearly a year after we had first requested it.

The VE study is dated June 2001. Why were we told this document did not exist? It appears that the City of Shoreline made a concerted effort to keep this document from the SMA. It is interesting to see the VE document repeatedly recommends that the City of Shoreline work with the AIC (now SMA) on this project. It is unfortunate that the city has refused to do so.

64-11 The Aurora Corridor, Volume 1<sup>3</sup> states "The goal of the Aurora Corridor project is to improve the safety for pedestrians and motorists...while supporting existing and future businesses and preserving the neighborhood character." Safety as the primary purpose for improving the roadway is mentioned in every volume of the Aurora Corridor (volume 1-volume 6)<sup>4</sup>, yet the DEIS *Goals and Objectives of Project* (page 1-7)<sup>5</sup> **does not even mention safety**.

What is does mention is ..."improve the economic development potential of the corridor, to provide for the enhancement of livability for communities adjacent to the corridor, and to be in agreement with the City's Comprehensive Plan for land use decisions under the Growth Management Act while recognizing the regional importance of the street in the overall transportation network."

64-12 1) Economic development will occur with an improved roadway, but a restrictive median will severely limit access to businesses along Aurora Avenue. Customers will proceed to the next business of the same type that is easily accessible (no median). This will slow economic development as existing businesses will see a reduction in the customer base and new businesses, which might locate on Aurora Avenue, will take the restrictive median into consideration when studying available sites.

64-13 2) Livability of communities adjacent to the corridor will be reduced if a restrictive median is installed on Aurora Avenue. Business customers will drive through the surrounding neighborhoods (three rights to make a left) to access the business as will freight deliveries. Our neighborhoods do not need or want this traffic and it is wrong of the city to force it on them.

3) The Comprehensive Plan can, and should, be changed. The Comprehensive Plan should not be responsible for destroying the existing business district. It is short sighted to assume that any lost businesses will be quickly replaced by new businesses. Any business assessing locations will look into why the previous

business closed and/or moved. They will study how easily a location is accessed, and from how many different streets.

- 64-14
- 4) The Growth Management Act was not created to become a tool for urban renewal, yet the City of Shoreline appears to be using the GMA in this manner.
- 64-15
- 5) State Route 99 (Aurora Avenue) is a **highway** of regional importance. It is one of only two north-south routes, the other being Interstate 5, traversing the Puget Sound area. The City of Shoreline is ignoring this when it plans to install twelve-foot sidewalks and a seventeen-foot planted median. These are inappropriate and unnecessary improvements for a highway. By not addressing the east-west traffic movements the City of Shoreline is dooming this section of SR 99 to a worsening of the Level of Service (LOS) at signalized intersections. SR 99 must be treated and improved as a state highway and a T2 tonnage freight route, not as a "main street" or a "downtown".

64-16

On **page 3-1** of the DEIS<sub>6</sub>, it lists the three locations that the Discipline Reports will be made available. These three locations are only open during normal business hours, drastically reducing the number of people who can access the reports. These reports were used to prepare the DEIS and they should have been available at the library (as WAC 468-12-455<sub>7</sub> states the DEIS shall be available at the library) or some other location that would be open in the evening or on the weekend.

When a member of SMA attempted to obtain a copy of the Discipline Reports they were unable to reach anyone at WSDOT that knew about the reports. The contact person listed in the DEIS for the City of Shoreline, Ms. Nichols said she did not have the reports and referred the SMA member to Mr. McKinley, who was out of town until August 5, 2002, the day before the DEIS hearing. The member finally turned to the city clerk who said a copy would be made and would be available on August 2, 2002.

SMA wants to know why the Discipline Reports were not part of the DEIS. Also, since they were not included in the DEIS, why were they so difficult to obtain? It again appears that the City of Shoreline was attempting to discourage citizens from reviewing related documents that ostensibly support the city's preferred plan.

64-17

**Page vi<sub>8</sub>**, "The outer limits of the project are approximately 50 feet beyond Aurora Avenue North right-of-way lines..." This is incomprehensible, as the project will impact the adjacent neighborhoods, which are beyond 50 feet of the right-of-way. Stating that it will have no effect on the neighborhoods is illogical to even the most casual observer.

**Page xviii<sub>9</sub>**, "The Interurban Trail will be environmentally documented in a separate NEPA document and then constructed in phases."

- 64-18
- 1) If the Interurban Trail, which will be three miles in length, is going to be studied in one environmental NEPA document, why wasn't the Aurora Corridor studied in one environmental NEPA document?
- 2) The Aurora Corridor is also three miles long and could then be constructed in phases, just like the Interurban Trail. Also, since the Interurban Trail and the Aurora

64-19 | Corridor parallel each other throughout the City of Shoreline, and are in close proximity to each other (within 50-100 feet), why were they not studied together in one environmental NEPA document? They will have an impact each other and on the environment (more impervious surface, more run-off added to our streams).

64-20 | The Aurora Corridor Project should be studied in one environmental NEPA document as it will be more difficult to construct than the Interurban Trail and will have greater cumulative environmental impacts on our watersheds, wetlands, streams, fish and wildlife. For this reason the environmental document must be a NEPA/EIS in order to fully study the environmental impacts of the Aurora Corridor Project. A NEPA/EIS will also study the socio-economic impacts, which the SEPA/DEIS scarcely considers and is misleading in regards to loss of businesses and the resulting loss of taxes.

64-21 | Page xix<sub>10</sub> states that Alternative A or B "...would largely be beneficial to the existing commercial land uses by providing greater vehicular, transit and pedestrian access..." In both Alternatives A and B there is a restrictive median, *which will limit access to businesses* along Aurora Avenue. To state that it will not do so defies logic. Businesses in other areas of our state and across the country have seen a reduction in business when a median was installed. In some cases, the reduction in business was 20% or more. Anyone can see what a 20% loss in income would do to a business, or a family.

- 1) How can this be presented as "beneficial" to existing businesses?
- 2) What studies were used to support this statement?

A report should have been prepared that studied how most customers access Aurora Avenue businesses. The vast majority of Aurora Avenue business customers arrive by car. Most do not ride the bus to or walk to these businesses. Adding Transit Only lanes and sidewalks will not change this fact. This report should have also studied the number of vehicles that use the two-way left-turn lane. The report would have shown that many customers use the two-way left-turn lane to access Aurora Avenue businesses.

64-22 | Page xx<sub>11</sub> states "The raised median...would have limited effects on emergency response times and no impact on police response times." Fire trucks, emergency vehicles and police cars frequently use the two-way left-turn lane to negotiate through traffic. If all three northbound or southbound lanes are blocked, and there is no two-way left-turn lane, this would force emergency and police vehicles either onto neighborhood streets or into on-coming traffic.

- 1) How can this be considered safe?
- 2) How can this not have an effect on response times?
- 3) Where is the documentation to support your statement?

This page also states "Additional signalized intersections would provide more opportunities for pedestrians to safely cross Aurora Avenue North. Neither build alternative would include bicycle lanes, however bicyclists could use the business access/transit lanes."

64-23 1) When considering the safety of pedestrians, why were pedestrian underpasses and overpasses not studied? These would separate pedestrians and motorists, increasing safety for everyone. The topography of the roadway lends itself to underpasses in several locations, thereby reducing the need for more signals that would inhibit the flow of traffic.

64-24 a) Why were "smart stud" crossings not studied?

64-25 2) A member of SMA has extensively researched "BAT" lanes. What he discovered is that BAT stands for **Bicycle And Transit**.

a) Why was the definition changed to Business Access/Transit lanes for this project?

64-26 3) Why does **page 3-47**<sup>12</sup> state "Wider sidewalks would minimize conflicts between pedestrians and bicyclists when bicyclists are on the sidewalk." The DEIS has already stated that bicycles could use the BAT lanes. Since bicycles are a mode of transportation, they should use the BAT lanes.

a) The Interurban Trail will accommodate bicycles as well, why are we concerned with making room on our sidewalks for bicycles?

b) Most cities have ordinances against riding bicycles on sidewalks. Does the City of Shoreline allow bicycles on sidewalks? If so, why?

c) Bicycles traveling at commuter speeds (20-25 mph) are a hazard to pedestrians. Is this an acceptable risk to the City of Shoreline?

4) Why were bicycle lanes not studied under any of the Alternatives?

This same page states, "Businesses that rely on the movement of goods and services along the corridor would experience reduced travel times and reduced transportation costs, as compared with the No Action Alternative." Freight Mobility is a major force in this state. Restricting access to businesses will hinder freight mobility.

64-27 1) A northbound semi-truck wanting to access a business on the west side of Aurora Avenue would have to;

a) Turn left at a signal south of the business then turn right onto a north-south neighborhood street, then turn right again onto an east-west street then access the business, if it has access, from the east-west street.

b) If the business does not have access from the east-west street, the semi-truck would have to turn right onto Aurora Avenue and then turn right into the business driveway. If the driveway is narrow, as many are, the semi-truck would have to use all three southbound lanes in order to negotiate a right turn.

2) A southbound semi-truck wanting to access a business on the west side of Aurora Avenue would have an easier time. It would have to;

a) Turn right into the business driveway. Again, if it is a narrow driveway, the semi-truck would have to use all three southbound lanes to negotiate a right turn.

3) What documentation supports the claim that either build alternative will result in reduced travel times and transportation costs?

4) Where are the studies of accidents that occur when a truck must use more than one lane to negotiate a right turn?

How can this reduce travel times or transportation costs? On **page 1-5<sub>13</sub>** it states "Aurora Avenue North also provides connection between other routes on the Regional Freight and Goods System, including Westminster Way/Greenwood Avenue (T2)..."

- 64-28
- 1) Why do Alternative A and B both restrict access to Westminster Way at North 160<sup>th</sup> street? Both Alternatives would require trucks to drive south to 155<sup>th</sup> street, negotiate a **more than 90 degree turn** onto North 155<sup>th</sup> street, and then a left turn onto Westminster Way.
    - a) How can this possibly increase freight mobility or reduce travel times and transportation costs?
    - b) What documentation supports the ability of semi-trucks to efficiently and safely negotiate the right turn at North 155<sup>th</sup> street?
      - i) Was the Washington Trucking Association informed of this proposed roadway re-configuration in order to garner their expertise and their comments on this proposal?

64-29

**Page xxi<sub>14</sub>** states, "Although predicted 8-hour concentrations are higher then the National Ambient Air Quality Standards (NAAQS) at North 145<sup>th</sup> Street, neither build alternative would create a new CO violation of the NAAQS, nor worsen an existing violation." We have several questions.

- 64-30
- 1) Is the DEIS saying that being in violation of the NAAQS is acceptable?
    - a) Why aren't steps being taken to correct the current violation?
  - 2) If the City of Shoreline has three southbound lanes, and the City of Seattle only has two southbound lanes, traffic will be "funneled".
    - a) How is it possible that the CO levels at North 145<sup>th</sup> street will not increase?
  - 3) If three lanes are trying to consolidate to two lanes at North 145<sup>th</sup> street, there will be more traffic backed up along southbound Aurora Avenue within the City of Shoreline.
    - a) During peak southbound travel times, isn't it probable that this backup will extend to North 155<sup>th</sup> street, creating a violation of the NAAQS at this intersection as well?
  - 4) With a new signal being installed at North 152<sup>nd</sup> street, won't this location also have a violation of the NAAQS? And wouldn't this be a new violation?
  - 5) With a new signal being installed at North 165<sup>th</sup> street, won't this location also have a violation of the NAAQS? And wouldn't this be a new violation?
- 64-31

On the same page it states, "...current conditions demonstrate that noise levels at two receptors (at the Shoreline Inn and Quest Inn) equal or exceed the FHWA Noise Abatement Criteria of 67dBA. The proposed project would not increase noise levels compared to the No Action Alternative. Therefore, no substantial impacts have been identified and none are anticipated for either Alternatives A or B."

- 64-32
- 1) With increased CO due to traffic backups comes increased noise. How is it possible that noise will not increase above current levels?
  - 2) At the Shoreline Inn (Motel) the traffic currently backs up northbound during afternoon peak travel times. With the installation of a new signal at North 165<sup>th</sup> street to the south, traffic will now stop southbound during all hours of the day and night. How will this location not see an increase in noise levels?
- 64-33

Again on **page xxi** it states, "Project-related impacts under the build alternatives would be limited to potential degraded water quality contributions to local streams and potential for increased flow rates and volumes that could also degrade water quality and aquatic habitat... Stormwater within the project area is presently untreated. Water quality would be improved under both build alternatives because they would require stormwater treatment. Hydraulic impacts to surface waters would be improved under Alternative A due to decreased impervious area (more potential for infiltration of precipitation) and the incorporation of stormwater detention facilities..."

- 64-34
- 1) Only oil will be filtered from collected surface water. There is no mention made of filtering in-solution contaminants. Due to the dramatic increase in planted areas that will be treated with pesticides and herbicides, there needs to be a system for filtering these solutions from the collected surface water.
  - 2) Stormwater treatment could be implemented under any alternative. It is disingenuous to imply that only Alternative A and B can do this.
  - 3) There are areas along Aurora Avenue that are gravel, soil or grass. These areas allow surface water to be absorbed into the ground, which in itself is a filter, as well as infiltration of precipitation. The planted center median will absorb some precipitation, but has the potential to add to the amount of surface water if the irrigation system is faulty, or runs on a rainy day.
- 64-35
- 4) Any build alternative will result in an increase in impervious area. When two, thirteen-foot lanes and two, twelve-foot sidewalks are added to the existing roadway, it is impossible for Alternative A to decrease the impervious area. This is a false statement.
- 64-36
- 5) There is no mention made in *Surface Water/Water Quality* of the additional water being directed to Boeing Creek from the \$1.8 million 3<sup>rd</sup> NW Drainage Project, which will expand the detention pond at this location. Because the project is being segmented, there are cumulative environmental impacts that are being ignored.
- 64-37
- 6) Detention ponds will result in a toxic "stew" if Best Management Practices (BMP) will not be followed. Why are no specifics given on what BMP will be for this project?

**Page xxii**<sub>15</sub> states, "The No Action Alternative would perpetuate the negative visual characteristics... a discontinuous street edge, numerous street signs and utility lines, and a lack of interesting visual elements, such as street trees or attractive street and sidewalk amenities."

- 64-38
- 1) The No Build Alternative could have been studied with the construction of continuous sidewalks of five-foot width and additional street lighting. Why was this not done?
  - 2) How are street signs a negative visual characteristic?
    - a) Does the above statement refer to business signs? If yes,
      - i) How can business signs that are unique and individual to each type of business be considered negative visual characteristics?
  - 3) "Interesting visual elements..." belong in our neighborhoods or along arterials, but not along state highways.
- 64-39



- a) Since the City of Shoreline already has plans for a "main street" in the North City area (15<sup>th</sup> NE with a planned reduction of lanes from four to two with a two-way-left-turn lane, street parking, wider sidewalks and street trees), why do we need to build another "main street" along Aurora Avenue?
- b) The Interurban Trail will parallel Aurora Avenue and be within 50'-100' of the highway. As the trail is intended for pedestrian use and will in effect be a new park, isn't the trail the logical area for "interesting visual elements"?

**Page xxiii**<sub>16</sub> states, "Aurora Avenue North has...unsightly commercial strip development. The City of Shoreline's goals...are to support economic stability along the corridor..."

- 1) How does the City of Shoreline plan to "support economic stability" when they are using the Comprehensive Plan, the Growth Management Act and the 32 Point Recommendations from the CATF to limit access and parking for businesses along Aurora Avenue?
- 2) According to the DEIS, **page 3-63**<sub>17</sub> "The purchase of property would impact retail and property tax revenues...relocate businesses and their employees, and remove parking from the area...Property acquisition would also displace 25 businesses and approximately 227 employees...These 25 businesses generate \$14 million in retail sales annually."
  - a) How can the City of Shoreline support economic stability along the corridor when their preferred Alternative A will eliminate at least 25 businesses, 227 jobs and \$14 million from the annual budget?
  - b) The City of Shoreline must realize that their preferred Alternative A is the reason most businesses have not maintained or renovated their buildings.
    - i) Under Alternative A, a substantial number of businesses will lose access and parking.
    - ii) Property owners will be reimbursed for property and/or structures taken for the project, but tenants (business owners) will receive nothing for any improvements made to a property or structure and are limited to \$10,000.00 in relocation costs. For most businesses this amount doesn't begin to cover renovation of a new location to make it suitable for doing business, let alone the costs of advertising to inform customers of the new business location.
- 3) There is no indication that either build alternative will improve traffic congestion, pedestrian safety or unsightly commercial strip development.

**Page xxiii** also states, "Additional environmental review, public involvement, and design analyses for the portion from North 165<sup>th</sup> Street to North 205<sup>th</sup> Street is contingent upon funding."

- 1) Why is the City of Shoreline improving only one mile of Aurora Avenue?
- 2) Why is there no funding for two-thirds of the project?
- 3) Why is the City of Shoreline spending nearly \$30 million on one mile, when \$30 million will allow for sidewalks the length of Aurora Avenue, adequate street lighting the length of Aurora Avenue, and a combination of pedestrian underpasses and street-level pedestrian crossings using smart-stud technology?

- 64-45 4) Why is the City of Shoreline spending twice as much per mile as the next most expensive SR 99 project, and six times as much as Edmonds/Lynnwood<sup>18</sup>?

Page 1-1<sup>19</sup> states, "For the past 6 years fatalities along Aurora Avenue North have occurred on average more than once per year."

- 64-46 1) Where is the documentation to support this statement?  
2) According to WSDOT the data for years 1997 and 1998 are incomplete.  
a) Was data from these two years included in the evaluation of fatalities on Aurora Avenue North?  
3) According to WSDOT accident data by milepost, there have been two fatalities for years 1999 and 2000 on Aurora Avenue in Shoreline.  
a) Doesn't this indicate an average of one fatality per year?  
4) Where are the studies showing comparisons of traffic accident data to roadways of similar design and traffic volumes?

64-47 Page 1-2<sup>20</sup> and 1-3<sup>21</sup> it states job growth will be less if no improvements are made.

- 1) Where are the documents to support this statement?

It also states, "Business types (including banks, offices, self storage, service, automobile repair, mini-casinos, porn video and appliance stores) will remain instead of transit supportive land uses, design and density that the City desires to support its Comprehensive Plan and GMA goals."

- 64-48 1) While some people might have a moral objection to mini-casinos or porn video, why is the City of Shoreline attempting to eliminate businesses that obviously have a customer base?  
2) Why are banks, offices, self storage, service, automobile repair and appliance stores not considered to be desirable businesses by the City of Shoreline?  
a). These are all businesses that are necessary to a thriving community.  
i) Is the City of Shoreline suggesting that these businesses do not belong in Shoreline, that Shoreline residents should go outside the City of Shoreline in order to use these types of businesses?  
64-49 3) What exactly are "transit supportive land uses"?

64-50 This same page misstates WAC 468-52-040 (4)<sup>22</sup>, which describes design elements of a Class IV highway, which WSDOT concurs is the correct classification for Aurora Avenue throughout Shoreline. Continuous medians are not required. No mention is made that  
64-51 the speed limit for Class IV highways is to be 30-35 mph. Signalization is to be ½ mile  
64-52 apart, yet the City of Shoreline plans to add signals at North 152<sup>nd</sup> street and North 165<sup>th</sup> street. Both new signals will be within ¼ mile of the next closest signal.

Due to misrepresentation of the WAC, this section is misleading to anyone not familiar with the WAC. Additionally, this section mentions RCW 47.50, but does not quote from it. It then quotes selected sentences from the WAC, without ever mentioning the WAC or the corresponding section. This makes it difficult for anyone to separate the RCW from the WAC and appears to be intentionally unclear.

64-53 Table 1-2 on page 1-4<sup>23</sup> shows estimated p.m. Peak Intersection LOS for 2020. It shows North 152<sup>nd</sup> street and North 165<sup>th</sup> street as LOS F. It does not list when this peak p.m. time period is, nor does it mention that the LOS F is for side street traffic delays. This is especially egregious when discussing North 152<sup>nd</sup> Street where it is currently a right-turn only onto Aurora Avenue. This table is misleading and has no documentation to support the figures.

64-54 This page discusses additional lane capacity then says the additional lane is limited to transit and business access. Adding a lane for transit only will not increase the capacity of the roadway. This will occur only if the new lane is HOV or SOV. From frequent observation of the "BAT" lane in north Seattle, one of two statements can be made;

- 1) People will not turn right out of a business into the BAT lane, they wait until there is an opening in the closest through lane.
- 2) Some people will drive in the BAT lane for extended lengths in order to bypass traffic.

Both of these defeat the purpose of a BAT lane.

64-55 This section also states "...improvements to signal equipment and timing are needed to allow arterial system to operate more efficiently." Signal Progression can only be achieved in one direction. Nowhere in the DEIS does it state this fact. Nowhere in the DEIS does it state the fact that adding more signals makes it more difficult to achieve signal progression, which would then lower the LOS at signalized intersections. These omissions are inexcusable and again appear to be calculated to mislead the public.

64-56 Page 1-5<sup>13</sup> talks of how important Aurora Avenue is to the Regional Freight and Goods System and that it provides connection to other freight routes. Westminster Way is one of those freight routes, and yet the City of Shoreline plans to turn Westminster Way into business access for Aurora Square, eliminating all freight traffic.

- 1) If this is an important freight route, why is Shoreline eliminating the current access for freight to Westminster Way?
- 2) Why does the DEIS neglect to mention that this is the plan for Westminster Way?

64-57 Page 1-6<sup>24</sup> talks of the CATF, but neglects to mention the Aurora Corridor CPAC. Why has everything this group studied, discussed and recommended been ignored by the City of Shoreline? Why weren't the CPAC recommendations studied in the DEIS?

64-58 Page 1-7<sup>5</sup> it lists the Goals and Objectives of Project. Although the City of Shoreline has repeatedly mentioned safety as the primary reason for the roadway improvements, including page 2-3<sup>25</sup> where it lists crash rates and less safe roadway conditions as justification for improving only one mile of Aurora Avenue, safety is not mentioned once in the Goals and Objectives for Project.

- 1) If safety isn't the primary reason for roadway improvements, what is the primary reason?
- 2) Is this simply an Urban Renewal project masquerading as a safety project?

64-61 | **Page 2-1<sub>26</sub>** describes the project study area. Specifically, it states the DEIS only studied North 165<sup>th</sup> street ~400 feet west and ~150 feet east.

- 1) Westbound traffic will be not only local residents but Shoreline Community College traffic as well. As SCC is obviously much farther than 400 feet west of Aurora Avenue, why did the DEIS only study ~400 feet?
- 2) Why was eastbound North 165<sup>th</sup> street only studied ~150 feet?
- 3) Eastbound North 165<sup>th</sup> street is a dead-end 1-½ blocks east of Aurora Avenue.
- 4) How can this street possibly be considered as a logical terminus for any project? It is not an arterial and does not have the infrastructure to support the additional traffic that will be directed onto this street due to the new signal. Nor are there any plans by the City of Shoreline to improve the infrastructure on North 165<sup>th</sup> street either east or west of Aurora Avenue.

**Page 2-2<sub>27</sub> and 2-3<sub>28</sub>** discusses HAL and PAL. One of the stated justifications for performing an EIS on only one mile and improving one mile from North 145<sup>th</sup> street to North 165<sup>th</sup> street is "Because this portion of Aurora Avenue North includes HALs, PALs, and has very high crash rates and less safe roadway conditions, it is the portion in greatest need for immediate improvement."

64-62 | WSDOT reports do not list Shoreline in the top 71 High Accident Corridors (HAC)<sub>A</sub> for year 1999 and 2000. WSDOT has admitted that from 1993 to 1996 the number of traffic accidents per MVM decreased. Year 1997 and 1998 are partial years and data from these two years should not be used in any traffic accident data calculations. When traffic accident data from 1999 and 2000 are calculated, after separating from accidents in Seattle and Edmonds, the accident rate is 6.08 MVM. This is much lower than 7.2 MVM for year 1996 and drastically lower than the 8.3 MVM stated throughout the DEIS.

This stated justification is based on inaccurate accident numbers, which invalidates the entire argument for segmenting the EIS. For this reason alone, the DEIS must be thrown out and the City of Shoreline must start over. A NEPA/EIS must be prepared with greater FHWA oversight to ensure all environmental aspects are studied as well as socio-economic impacts.

The existing ecological and socio-economic environment has been in place far longer than the City of Shoreline has been in existence. We are not creating a city from scratch, such as Disney Corporation did with Celebration, Florida. This is an existing entity that improvements must be planned around, rather than incorporating improvements that cause the deterioration or outright destruction of the existing entity.

64-63 | **Page 2-3<sub>28</sub> and 2-4<sub>29</sub>** discussed Logical Termini. There is no justification for North 165<sup>th</sup> street being the logical termini of this project. It is not an arterial, is not designated an arterial and does not have the infrastructure required to handle the increased traffic volumes. The City of Shoreline does not have improvements planned for North 165<sup>th</sup> beyond ~150 feet of Aurora Avenue. This is another false presumption that invalidates

64-64 the entire argument for segmenting the EIS. The DEIS must be discarded and a NEPA/EIS must be prepared. The most alarming aspect of North 165<sup>th</sup> street becoming the "terminus" of this project is that the surrounding neighborhoods are not aware that traffic is going to be directed through their neighborhoods.

64-65 **Page 2-5**<sub>30</sub> mentions the Central Sub-area Plan for North 172<sup>nd</sup> street to North 187<sup>th</sup> street and states "Entirely different design configurations for Aurora Avenue North...may be considered for that area."

- 1) What exactly does this statement mean?
  - a) How different is the City of Shoreline planning to make this section of Aurora Avenue, which is part of the same corridor?
- 2) Why are this area, and the northern section of Aurora Avenue, being treated by the City of Shoreline as separate roadways?

64-66 Also on **page 2-5**<sub>30</sub> the listing of Alternatives Examined but Rejected is states "Two advisory committees-CATF and ITAC-collaborated to develop three design alternatives for evaluation..." The CATF did not help "develop three design alternatives". The CATF was **given** three designs to review, which is contrary to A Primer for Local Agencies on Access Management in Washington State, which says "They need to be invited to solve a problem, not approve a proposal that agency staff has already developed."

64-67 **Page 2-7**<sub>31</sub> it states that Alternative 2 had the "...greatest improvement to transit operations...Pedestrian safety was improved the greatest under Alternative 2."

- 1) Where are the studies supporting these statements?
- 2) Transit already has the right-of-way when merging into traffic (state law).
  - a) Where are the studies that show transit operations are improved with a transit only lane?
  - b) Where are the studies of transit operations with bus pullouts?
- 3) Pedestrian safety could be improved under any alternative.
  - a) Why did none of the alternatives study the use of pedestrian underpasses or overpasses, the safest way for pedestrians to access the other side of the roadway?
  - b) Why are "smart stud" pedestrian crossings never mentioned in the DEIS?

64-68 On this same page it states, "Two refinements of Alternative 2 were presented in the scoping notice."

- 64-69
- 1) Why was a plan that was created by Shoreline Merchants Association and Concerned Citizens For Shoreline, in conjunction with Cottingham Transportation Engineering, not used as one of the Alternatives in the scoping? This plan was referred to as **Alternative C<sub>E</sub>** by several speakers at the August 6, 2002 hearing on the DEIS.
  - 2) Why was this plan not mentioned in the DEIS as an Alternative From Scoping?

64-70 **Page 2-8**<sub>32</sub> again states that raised medians are required, which is a false statement.  
64-71 This document refers to high volume of traffic as justification for raised medians, and

64-71  
cont.

then uses low numbers when calculating traffic accident data per MVM. There cannot be high traffic volumes to support one statement, and then low traffic volumes to support another statement. This is misleading and reprehensible.

64-72

This page also states, "...crashes would remain at high levels with continued risk of severe crashes, including fatalities." There were no fatalities in 1999 and only one in 2000 for this section of roadway. This section also neglects to mention that Aurora Avenue, with a highway classification of IV, should have a speed limit of 30-35 mph. By reducing the speed limit just 5 mph, traffic accidents can be greatly reduced, severity of accidents lowered and the risk of a fatal accident occurring would be nearly cut in half.

- 1) Where are the studies comparing traffic accident data between roadways with 40 mph speed limits and 35 mph speed limits?
- 2) Why is lowering the speed limit to 35 mph not discussed?

64-73

Page 2-9<sup>33</sup> states, "The City of Shoreline Comprehensive Plan specifies that sidewalks, street trees, pedestrian crossings, and other pedestrian amenities be provided."

- 1) Why is this statement even in the DEIS?
  - a) Is the intent of including this comment to mislead the public?
- 2) Why is no mention made that the Comprehensive Plan **can be changed!?!?**
  - a) Is this an intentional omission?

64-74

Page 2-10<sup>34</sup> states, "Providing a 4-foot-wide outside shoulder would allow for bike use; however, there are parallel bike facilities, which substantially limits bike use on SR 99."

- 1) These "parallel facilities" would also accommodate pedestrians. Why is this not mentioned?
- 2) Where are your studies on bicycle commuters?
  - a) Are you aware of the studies that show bicycle commuters want to commute on the roadway in a bicycle lane rather than on a multi-use trail?

64-75

Page 2-14<sup>35</sup> talks of the sidewalk width and the four-foot amenity zone that would act as a "buffer" between traffic and pedestrians.

- 1) Are you aware that studies show pedestrians do not feel safer on a sidewalk, no matter what the width, unless there is street parking between them and the traffic?
- 2) Where are your studies supporting the implication that a twelve-foot wide sidewalk is any safer than a six-foot wide sidewalk?

64-76

Page 3-1<sup>6</sup> States, "Because the project will not require or lead to the displacement of businesses or residences, relocation has not been addressed in this document." By reducing the access to and/or eliminating the parking for a business, you have condemned them to relocation. This should have been studied and the impacts should have been reported in the DEIS. A survey of the businesses with access from Aurora Avenue would have been beneficial in understanding how these businesses would be impacted by the studied alternatives.

- 64-77 1) Did the City of Shoreline, or CH2MHill, ever talk to business owners about the alternatives - describing exactly how the roadway and business access would change - and how the businesses would be impacted by each alternative?  
a) If not, why not?

64-78 On this same page it discusses the location of the Discipline Reports. Again, these should have been included in the DEIS, or at least been made available at the local library.

64-79 **Page 3-3<sub>36</sub>** mentions that the North City improvements were included in the traffic forecasts.

- 1) How were the North City improvements included in this document?  
2) Where are studies of traffic volumes that will shift from 15<sup>th</sup> Avenue NE to Aurora Avenue North or other north-south streets?

64-80 This same page refers to the existing right-of-way width, saying that it varies from 90-130 feet.

- 1) Why was there no alternative studied that would fit within the narrowest part of the existing right-of-way, or 90 feet?  
a) Wouldn't this type of alternative be much less expensive than either Alternative A or Alternative B?

64-81 **Page 3-5<sub>37</sub>** shows Figure 3-1, Existing Traffic Volumes and Intersection Level of Service 2000 PM Peak Hour.

- 1) Why are signalized and unsignalized intersections listed in the same figure?  
a) Listing the two types of intersections together gives the appearance that Aurora Avenue has poor LOS at North 165<sup>th</sup> street when the LOS of F is for left-turning traffic from North 165<sup>th</sup> street. Is this misrepresentation intentional?  
i) Why were no alternatives studied that would restrict left turns from North 165<sup>th</sup> street, thereby increasing the LOS?

64-82 2) Where are the studies showing that signal progression can only be synchronized in one direction?

- 64-83 a) Does CH2MHill staff know this, are they even aware of this fact?  
b) In which direction will signal synchronization on Aurora Avenue be implemented, northbound or southbound?

64-84 **Page 3-6<sub>38</sub>** and **page 3-7<sub>39</sub>** again talks of WSDOT traffic accident data for 1999 and 2000, and again the numbers in the reports do not support the statements in the DEIS.

64-85 **Page 16 of the Transportation Discipline Report<sub>40</sub>**, Table 5 shows transit service. One bus route, Metro route #358, runs the length of Aurora Avenue in Shoreline. It shows peak service frequency of 5-7 minutes, but does not list peak service times. Off-peak service frequency is only every 30 minutes.

- 1) Why are we constructing and paying for a transit only lane for one transit route that only runs two times an hour for the majority of the day?

64-86 | **Page 3-8<sub>41</sub>** in the same paragraph discusses the Interurban Trail being constructed for bicycle and pedestrian use and the sidewalks that will be constructed the entire length of the Aurora Corridor.

- 1) Why are we constructing twelve-foot wide sidewalks along Aurora Avenue when most people will use the Interurban Trail to move along the corridor?
  - a) Aren't the twelve-foot sidewalks redundant when you consider the Interurban Trail will be parallel to Aurora Avenue?

This same page states, "Truck traffic currently accounts for 4 to 6 percent of total traffic in the project area." At the estimate used in the DEIS of 35,000 to 40,000 vehicles per day, this would equal 1400 to 2400 trucks per day along the corridor. This paragraph also mentions that SR 99 is part of the Washington State Freight and Goods Transportation System, is a secondary freight corridor for I-5 and that Westminster Way is a connector between SR 99 and the Ballard-Interbay manufacturing and industrial center.

- 64-87 | 1) With the amount of trucks that use the corridor, how can the City of Shoreline consider restricting access to Aurora Avenue businesses, most of who receive freight deliveries?
- 64-88 | 2) How can the City of Shoreline consider closing Westminster Way at North 160<sup>th</sup> street to truck traffic?
  - 64-89 | a) The LOS at southbound, North 155<sup>th</sup> street will be significantly reduced by the redirection of all Seattle truck traffic to this intersection. Why is this fact not mentioned in the DEIS?

**Page 3-152<sub>42</sub> and 3-153<sub>43</sub>** shows two tables with the Survey of Land Uses for Alternative A and B:

- 64-90 | 1) Why is the Quest Inn listed as NO under Alternative A and YES under Alternative B for Land Use Likely to Generate Hazardous Materials?
  - a) What is the justification for this?

**Page 4-6<sub>44</sub> and 4-7<sub>45</sub>** the DEIS talks of the Open Houses that were held

- 64-91 | 1) Where are all the comment sheets from these Open Houses?
  - a) Why were these comments sheets not included in the supporting documents used to prepare the DEIS?

**Page 4-7<sub>45</sub>** also discusses the presentations given at various City Council meetings.

- 1) Where are the transcripts of these City Council meetings?
  - a) Why was the public input from these City Council meetings not included in the supporting documents used to prepare the DEIS?

**Page 4-8<sub>46</sub>** there is a summary of the May 23, 2002 meeting with Representative Kagi and Secretary of Transportation Doug McDonald.

- 64-92 | 1) SMA concerns regarding the safety of our neighborhoods, as well as our concerns that the safety will be increased on Aurora at the expense of the safety in our neighborhoods is missing. Why?



- 64-92  
CONT.
- 1) Why are SMA comments omitted stating that businesses do not want their customer and freight traffic in the neighborhoods?

On this same page there is a summary of the June 26, 2002 Design Alternatives meeting held at WSDOT NW region office. The last sentence states, "The WSDOT staff agreed to write up meeting notes and to respond to the questions and proposals." While we have received minutes of this meeting, there has been no response to our questions, our safety proposals or our design proposals.

This DEIS is filled with inaccuracies, misstatements, omissions and questionable or incorrect data. This document does not address the ecology of the City of Shoreline as a whole and the cumulative effects this, or any project, will have on the environment. Destroying a viable business district will have a devastating effect on city funds, forcing the city to turn to the remaining businesses and the citizens to make up the shortfall. For this to have been ignored in the DEIS defies logic. This document is incomplete and should be discarded.

64-93 | A NEPA/EIS must be performed in order to insure all environmental impacts are studied as well as the socio-economic impacts.

We reserve the right to submit more comments and documentation. CH2MHill had approximately ten months to create the DEIS. They have a cadre of employees to put the document together. We are private citizens and small business owners. We have businesses to operate and families, which restricts the amount of time available to research this document. We are only given 30 days in which to prepare comments and supporting documents. While this may be all the time the law requires, it is insufficient.

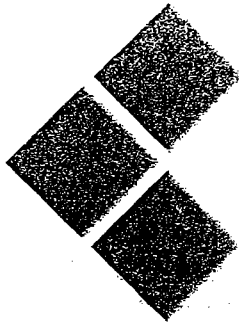
64-94 | Also, the Discipline reports were not included in the DEIS and were not made available until August 2, 2002. There appeared to be a conscious effort to limit the amount of time these reports could be studied.

Respectfully Submitted,

Diana L. Stephens,  
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We, the undersigned, support the plan for the Aurora Corridor as designed by Shoreline Merchants Association and Concerned Citizens For Shoreline. (Support for DEIS Comment Sheet - SMA)

Name	LAWRENCE M. WHEATON	Position	GO-TOBE GENERAL MANAGER	Business	GODDIES SHORELINE CASINO
Signature	<i>Lawrence M. Wheaton</i>	Address	15030 AURORA AVE N	Phone	206.730.4635
Name	JACK E. WICKERS SR	Position	Facilities Manager	Business	Goddies Shoreline Casino
Signature	<i>Jack E. Wickers Sr</i>	Address	15030 AURORA AVE N	Phone	206-510-0831
Name	Anthony Polanco	Position	Investor	Business	None
Signature	<i>Anthony Polanco</i>	Address	2433 NW 198th	Phone	206 546-9418
Name	Lighter Mykara	Position	Consulting	Business	206-498-9527
Signature	<i>Lighter Mykara</i>	Address	19025-9th Pl NW	Phone	
Name	W. Dan G Moniz	Position	Dancer	Business	
Signature	<i>W. Dan G Moniz</i>	Address	10210-10th Ave NE	Phone	364 1657
Name	Diane Cottogno	Position	Jazz N Aways	Business	Dividend Promotions
Signature	<i>Diane Cottogno</i>	Address	350 NW 175 ST	Phone	206-542-9332
Name	K. E. Cottogno	Position	Owner	Business	Cottogno Transport for Engr.
Signature	<i>K. E. Cottogno</i>	Address	350 - NW-175	Phone	206-546-3030
Name	Daniel A. Mann	Position	Home & business owner	Business	Tropical Tan Inc
Signature	<i>Daniel A. Mann</i>	Address	19926 Airway Ave NE	Phone	206-542-8824
Name	Edsel Hammond	Position		Business	
Signature	<i>Edsel Hammond</i>	Address		Phone	
Name	Edsel Hammond	Position	Home Owner	Business	Concerned Citizens for Shoreline
Signature	<i>Edsel Hammond</i>	Address	18541 Burke Ave N	Phone	(206) 546-1217
Name	W. Dan G Moniz	Position	Owner	Business	Concerned Citizens for Shoreline
Signature	<i>W. Dan G Moniz</i>	Address	711 N 193 St	Phone	206 542 3903
Name	DOUGLAS STEPHENS	Position		Business	
Signature	<i>Douglas Stephens</i>	Address	17030-2nd NW	Phone	206-542-8728



# COTTINGHAM TRANSPORTATION ENGINEERING

350 N.W. 175TH ST. - SEATTLE, WA 98177 - PHONE 206-546-3030  
P.O. BOX 7370 - SEATTLE, WA 98133 - FAX 206-546-5203

Log # 64a

DUPLICATE (Log #38)

Mr. Timothy M. Stewart, AICP  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline WA 98133-4921

August 16, 2002  
Friday by 5:00pm

#2034-1  
Page 1 of 7

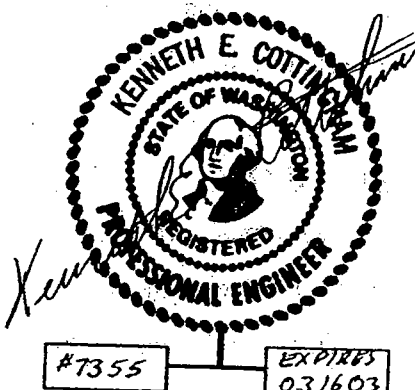
## RE: REVIEW OF DRAFT ENVIRONMENTAL IMPACT STATEMENT of July 9, 2002 AURORA AVENUE NORTH, North 145 Street to North 165 Street

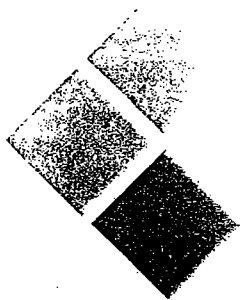
Dear Mr. Stewart:

I have reviewed the above noted document, DEIS and have previously submitted comments regarding the content of this study prior to it's inception (letter of August 24, 2001). These comments were developed with others and from my own training, experience and education knowledge in transportation engineering and jointly with the Shoreline Merchants Association (SMA). This four page document was submitted for the August 24 cutoff date for items to be included in the scoping process for the DEIS. In a summary of my comments that also represented the SMA, were the following:

[COPY ATTACHED]

1. Project Purpose and Need
2. Description of proposal
3. Location of proposal.
4. Alternatives A and B.
5. Scoping/Public comments
6. Previous Studies of the multimodal corridor project.
7. Traffic Signal System.
8. Accident Analysis.
9. Summary.





## **REVIEW OF DRAFT ENVIRONMENTAL IMPACT STATEMENT**

**Page 2 of 7**

**#2034-1**

**August 16, 2002**

### **AUGUST 24, 2001 SUBMITTAL**

It appears that very little was inputted into the DEIS of the above comments. At the top of the list would be the unreasonable section of a one mile DEIS for a three mile section. Wherein the one mile must depend upon operational features that are contained in the total three mile area. This would be true as it relates to drainage, signal system interconnection, impact of east/west streets outside of the one mile corridor that will input traffic origin and destination within the total three miles, including the one mile section and the termination of the first mile section at North 165 Street, a minor cross street that is intended to be signalized by the City. This section cannot stand alone without addressing the full three mile section and was not adequately considered in the DEIS.

### **N. 165 STREET TRAFFIC SIGNAL**

The inclusion of a traffic signal at North 165 Street is unreasonable and unwarranted for various reasons, but in particular because it violates the WAC 468-52-040, which states that signalized intersections spacing shall be one-half mile apart with signal progression. Neither the one-half mile requirement nor the signal progression requirement has been met by the DEIS. In order to keep the one-half mile requirement under Class 4 in the WAC, the traffic signal must be removed at N. 160 St. Thence we will have one-half mile spacing from 145 to 155, 155 to 165 and 165 to 175 and 175 to 185. Clearly the three-mile section should have been considered in order to properly apply WAC 468-52-040, and the need for traffic signal progression must be identified as feasible. It will not be feasible under the proposed plan and was not addressed in the DEIS.

### **BAT LANES AND LEVEL OF SERVICE (LOS)**

The BAT lane (business and access lanes) are "coined" in this description different than commonly used descriptions in the State of the Federal Standards and Guidelines. However, these two additional lanes will not be carrying thru traffic, only busses and turning. With very little bus traffic [estimated by others that one bus line each way], there will be little if any, increase in capacity of Aurora. Capacity calculations in the transportation literature envision a right only or left only lane as

## Log # 64b

DUPLICATE (Log # 27)

August 15, 2002

Mr. Timothy M. Stewart  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Ave. N.  
Shoreline, WA 98133

Subject: Comments on the Draft EIS for the SR99 Aurora Ave N. Multimodal Corridor Project: North 145<sup>th</sup> St. to North 165<sup>th</sup> St.

Dear Mr. Stewart:

I join virtually every other business owner located on Aurora Ave. in Shoreline, in opposing either of the City's proposed plans A or B. My opposition to the project design is rooted in the fact that either build alternative will result directly in the unnecessary destruction of several existing businesses (see Table 3-39). What's more, the final configuration, with relatively continuous raised center medians will, I believe, result in the eventual destruction of dozens of other existing businesses. This belief is supported by several examples, the most dramatic of which is Union Avenue, in Portland, where a once thriving commercial strip was decimated by the introduction of a raised median. 80% of the businesses along that strip failed within 10 years after the median was installed. The City of Portland has since removed the median, and the area is now recovering smartly.

The whole argument for a median is based upon two false premises:

1. WSDOT's contention that Aurora Avenue, through Shoreline, is one of the most dangerous sections of highway anywhere in the State. WSDOT's own accident statistics show that to be an outright lie. No part of this strip is anywhere to be found in WSDOT's latest list of the 71 most dangerous sections of highway in the state.
2. That WSDOT regulations require a raised center median. SR99 though Shoreline remains a "Class 4" highway, under WSDOT's own standards. "Highways in this class are typically distinguished by existing or planned non-restrictive medians" (see WAC 468-52-040).

WSDOT and FHWA must demand the City perform a NEPA EIS, which requires a study of the Socio-economic impacts of the project. How can our city officials be expected to make wise decisions on this project, which will shape the future of Shoreline forever? I strenuously object to this project going forward without such a study.

I am struck by the fact that the City of Shoreline has relegated the Aurora Avenue business and property owners to the status of outsiders. These are the very people whose lives and livelihoods will be most impacted by the project, and consequently should have been the most important stakeholders involved in the design and decision process. But from the beginning, the City seems to have deliberately excluded us. I cite as evidence the following:

1. The City ignored the recommendations of its own CPAC (Comprehensive Plan Advisory Committee), which stressed the need to respect the Aurora business owners, and wanted nothing to do with 12' wide sidewalks.

2. The City Council resolution passed on October 26, 1998 authorizing formation of the CATF stated that there should be 5 positions for Aurora Ave. business or property owners plus one for a Chamber of Commerce representative on the 13-member task force. Defying that resolution, they appointed only 1 Aurora Ave. business owner (Chuck Olson). They hand picked the task force, including the City's landlord, one of his employees (neither of whom had businesses on Aurora), plus representatives of 2 other businesses not on Aurora, to fill the other Aurora business positions. The City's landlord owns and manages several properties that stand to benefit financially, if the project is constructed under either Alternative A or B. As such, there was a clear conflict of interest for him to even serve on the task force, let alone be appointed its chair.
3. The CATF did not keep adequate records. Of the 14 meetings, they have records of only four. The minutes, such as they are, make no mention of the testimony of dozens of business owners and individuals opposed to the City's designs. They make no mention of the debate over sidewalk the width, nor do they record any votes on sidewalk widths. The only vote they do mention is recorded on a different night than when it actually occurred. These are important points, since they give such weight to the CATF recommendations throughout the DEIS.
4. The City proceeded to divide the project into 3 phases, submitting only the 145<sup>th</sup> St. to 165<sup>th</sup> St. segment for EIS review. From an EIS standpoint this makes no sense I believe it violates EIS regulations. It makes sense only if they are attempting to get approval of their flawed design on the least controversial section of highway, so they can ram this same design down our throats on the other sections, where the impacts will be even more devastating.
5. The City is also taking advantage of the fact that ethnic minorities own a disproportionately large percentage of the businesses in this first section, many of whom do not speak or understand the English language well. For cultural reasons, they are much less likely to even get involved, let alone raise their objections to this project. The City has violated the principle of Environmental Justice.
6. The City initially applied for a NEPA Categorical Exclusion instead of doing an EIS. The Categorical Exclusion can only be used if there is no significant opposition to the project. That was patently untrue, and the City knew it when it submitted the documents.
7. The EIS process requires the City to consider at least one design alternative plus a "No Build" alternative. For this purpose, the City should have considered the design concept used on the Lynnwood Model (page 2-8), but refused.
  - a. To suggest that the Lynnwood model was unworthy of study because it lacked pedestrian crossings is absurd. The Shoreline Merchants Association (SMA) has demonstrated how easily and inexpensively the Lynnwood plan could have been modified to satisfy that desire.
  - b. Access management is another straw man in this argument. As you know, access management principles can be applied to any plan.
  - c. The body of study on raised center medians versus two-way left turn lanes (TWLTL's) does not support the conclusion that "Traffic crashes would remain at high levels..."
  - d. The most ridiculous objection to the Lynnwood model is the suggestion that it does not support transit use. I suppose their HOV lane is not used for that purpose.
8. The City refused to even consider the plan prepared by CCFS and SMA (recently referred to by many as Alternative C). That plan met all of the goals of the project, and offered flexibility with regard to pedestrian safety crossings, medians at strategic locations, and access management. That plan had the additional benefit of staying almost entirely within the existing right of way, resulting in dramatically reduced costs and disruption of the businesses. At a 6/26/02 meeting with WSDOT officials, Mr. Phil Fordyce agreed that WSDOT would study the safety implications of the CCFS/SMA plan, as compared to the City's alternatives, but their representative, Mark Leth, has since refused to return repeated phone calls, to further the dialog in this matter.
9. We have not found a single Aurora Ave. business owner who prefers the City's plan to the CCFS/SMA Plan. What is more, the Mayor could not name even one business that preferred the City's plan.

August 15, 2002

To:

Timothy Stewart, ACIP  
City of Shoreline  
17544 Midvale Ave N  
Shoreline, WA 98133-4921

Reference:

Memo of 8/23/01  
To: The City of Shoreline  
Attn: Joyce Nichols  
Subject: Comments on the Scope of the Environmental Impact Statement (EIS) for  
Aurora Corridor N 145<sup>th</sup> -N 165<sup>th</sup> Streets

Subject:

City of Shoreline AURORA CORRIDOR "Transportation Solutions for Shoreline's Main  
Street" EA/Draft EIS

The reference memo of 8/23/01 clearly defined the scope required for an Aurora Project  
EIS. When there are several known projects identified for a small local area I believe it to be  
necessary for the impacts of those projects to be studied for their cumulative impacts on the  
community.

The projects that I am referring to include:

- North City
- Ronald Bog
- 15<sup>th</sup> Avenue NE
- Central Area Sub-area Plan
- Transit Oriented Development at N 192nd Street
- 3<sup>rd</sup> NW Drainage Project
- Sears Square
- Aurora from N 145<sup>th</sup> Street to N 205<sup>th</sup> Street

The entire community of Shoreline is affected by these projects and without studies that  
address their cumulative impacts the Aurora Project cannot be viewed to be in the best interest of  
the public. Shoreline citizen voted for incorporation as means of preserving our community and  
way of life. The citizens deserve to know the true impacts of these projects.

The cumulative impacts of these projects must be studied and the impacts of the  
following important elements of our community evaluated.

1. Traffic flows
2. Pedestrian safety with emphasis on the safety of our neighborhood streets (where  
our children walk to school and play)
3. Impacts on our sensitive areas and habitat
4. Air quality
5. Lights
6. Water
7. Sewers

64c-2  
CONT.

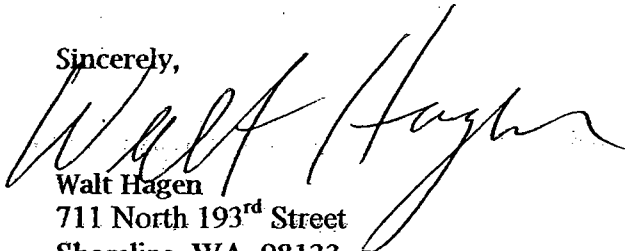
8. Design and Construction Cost
9. Recurring Costs
10. Aurora Businesses

Without the above items the DEIS is incomplete, and it is not possible to develop a truly constructive critique of this EIS.

I respectfully reserve the right to submit further comments on this EIS.

Your consideration of these comments and those of the Reference memo are urgently requested.

Sincerely,



Walt Hagen  
711 North 193<sup>rd</sup> Street  
Shoreline, WA 98133  
206 542 3903

Attachment:

Memo of 8/23/01

Subject: Comments on the Scope of the Environmental Impact Statement (EIS) for Aurora  
Corridor N 145<sup>th</sup> -N 165<sup>th</sup> Streets



## Log # 64d

DUPLICATE (Log #25)

Daniel A. Mann  
17920 Stone Avenue North  
Shoreline, WA 98133

July 22, 2002

Attention: EIS Hearing Examiners

Shoreline Planning Commission  
17544 Midvale Avenue North  
Shoreline, WA 98133

To Whom It May Concern:

I am writing to object in the most strenuous terms to Alternatives "A" and "B" in the Aurora Corridor EIS and the process by which they were developed.

My objections start with the fact that the Citizens Advisory Task Force was not representative of the Aurora businesses nor of the most impacted neighborhoods. There were only two Aurora Avenue merchants on the task force, instead of the five originally agreed to by the council. There was no representation from Meridian Park, one of the most highly impacted of the residential neighborhoods despite the application of several of its residents.

The Citizens Advisory Task Force was chaired by someone who stands to make *millions of dollars* on the basis of this plan raising the value of his real estate holdings. This was a clear conflict of interest that should have disqualified him from participation, let alone leadership. Additionally, there are few records, if any, of the alleged meetings and only one record of any voting - and that record is disputed by two of the participants.

I also object to plan design features that waste precious commercial Aurora corridor real estate and make doing business more difficult in an already difficult business environment. The 12-foot sidewalks are an extravagant waste of limited commercial frontage for an already built-out urban

commercial corridor. In many instances, those sidewalks will take most or all of small business parking - making the land commercially useless.

The continuous raised center medians will reduce access for customers and cause many of them to simply drive by without stopping. We (Aurora Corridor Merchants) have seen no proof from WSDOT that focused mid-block U-turns are safer than mid-block left turns. Common sense tells me that a U-turn across three lanes of traffic is more dangerous than a left turn. Furthermore, the medians are a huge impediment to freight mobility on this commercial corridor. Large trucks and semi-trucks are unable to make U-turns in the space available within the median, and will be compelled to access their customers by traveling through adjacent residential neighborhoods. Emergency vehicles will also be impeded by the medians.

The alternative plan for Aurora created by the Shoreline Merchant's Association will solve the traffic problems at less than one-third the cost without destroying businesses, jobs and tax flow. It increases capacity with less stoppages than the city's plan, and provides greater emphasis on pedestrian safety. It's a sensible alternative that meets the traffic, safety, and economic needs of the community.

Sincerely,

Daniel A. Mann  
Aurora Business Owner and  
Meridian Park Resident



August 13, 2002

Timothy M. Stewart, AICP  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Avenue N  
Shoreline, WA 98133

Dear Sir,

The Shoreline Chamber of Commerce respectfully submits our concerns for submission into the Aurora Improvement Project Draft Environmental Impact Statement process.

The disruption caused by the Aurora Project will be an additional stress on already overstressed businesses. We do not agree that the effect on retail sales would be "short term and not substantial" (Draft Environmental Impact Statement (DEIS), pxx). Speed of construction is essential to minimize damage to existing businesses. Reducing short and long term expense of the project would be prudent. The Shoreline Chamber of Commerce based our position on the issues our members tell us concern them most. Alternative B closest serves the business community if the following solutions were integrated into the plan.

**Points of Concern:**

1. **Signage.** (p3-64 DEIS), Mitigation measures "economics" street signage for businesses is not addressed.

**Concern:** Loss of existing signage and loss of roof mounted or pole signs causing loss of business. Expense of moving signage is another concern.

**Solution:** Any grandfathered signage that needs to be relocated should retain all of its grandfathered rights. The cost of relocating signage should be covered by the project.

2. **Sidewalks.** (pxvii DEIS), Alternative "A" would construct 8 ft. sidewalks, plus an 8 ft. amenity zone.

**Concern:** The expense of wider sidewalks and amenity zones in construction costs and maintenance is unnecessary. Currently it is required that when a property is sold on a lot where the sidewalk has been reduced to mitigate impacts on a building, that the new owner is required to bring the sidewalk up to code. This could cause a devaluation of the property. This should be changed to be consistent with other code requirements to mitigate impacts.

**Solution:** Sidewalks should be 8 ft. maximum including any amenity zone. Sidewalks should be reduced to a 5' minimum where it will save existing buildings and parking. In

event that the sidewalk is reduced to accommodate an existing building, the subsequent owner will not be required to widen the existing sidewalk and adjust the front of their building unless the building is being altered in excess of 50% of the assessed value of the land and buildings combined.

3. **Medians.** (p2-16) Both alternative "A" and alternative "B" provide less than adequate access to business. There are only 5 dual left turn lanes in alternative "A" (p2-14 DEIS) and 6 dual turn lanes in alternative "B".

**Concerns:** Extra construction costs. More time for construction causes hardship for businesses. Reduced visibility of businesses causes loss of customer traffic. Limiting access for emergency vehicles. Increased costs for maintenance of the median plantings.

**Solution:** There should be no center medians except for pedestrian safety islands at crossing areas (such as those currently at 170<sup>th</sup> and 165<sup>th</sup> on Aurora). The pedestrian islands should be no wider than 12'. For the safety of pedestrians, vegetation should be low growing. Alternative "B" with these listed modifications is preferred.

4. **Trees.** (p3-134 DEIS), Visual quality; "different maple trees would be planted along the project area".

**Concern:** Trees will cause businesses to be less visible, reducing customer traffic. The cost of maintaining trees is of concern. The extra construction cost for watering, drainage and proper soil preparation is unnecessary. The extra time needed for construction is a burden for businesses.

**Solution:** In amenity zones there should be no trees. Vegetation planted should be low growing.

5. **Mitigation of Impacts** (p3-21 DEIS), "Partnerships with adjacent businesses would be maintained throughout."

**Concern:** The construction process will hurt access to businesses and disrupt customer traffic.

**Solution:** Finish the project as quickly as possible. Maintain good communication with merchants to minimize negative impacts. Facilitate ingress and egress to businesses.

6. **Assessment of Property** (p3-33 DEIS), "Property acquired ... at fair market value."

**Concern:** That fair market value be paid for any buildings or property that the project displaces.

**Solution:** Increase the allowable expense for assessing property value to \$15,000.00. Have a mediator available to resolve disputed values.

## Log # 64f

Timothy Stewart, ACIP  
City of Shoreline  
17544 Midvale Ave N  
Shoreline, WA. 98133-4921

DUPLICATE (Log #55)

August 15, 2002

RE: City of Shoreline AURORA CORRIDOR "Transportation Solutions for Shoreline's Main Street"  
Storm water comments on the EA/Draft EIS

The information about Thornton Creek in the EIS is incorrect. The historical channel of Thornton Creek is depicted on all historical maps as having a westerly flow, or bend, once it enters Shoreline directed West towards Aurora just North of Bitter Lake. (See attachment #1 a 1897 map 3 pages)

What the report refers to as the Western Tributary is actually the historical North Fork of Thornton Creek. Contrary to the report, the storm water flows directed towards Thornton Creek off the Aurora Project will not only enter the Thornton Creek main channel, but also it's historical path. The City of Shoreline's storm drain stenciling project map, depicts open waterways of notable size within 3 blocks of Aurora conveying directly into Thornton Creek. (See attachment #2, City of Shoreline map)

The City of Shoreline's stream inventory report, paid for and completed with tax dollars, is 9 months over-due. The report claims the main channel of Thornton Creek and Ronald Bog/Twin Ponds water are separate entities. Attached is a contract from 1963 when I-5 went in specifically describing the two courses of Thornton Creek. The present main stem flows to the west through the ponds and the conveyance along the freeway is an overflow side channel. (See attachment #3 1963 contract with King County & Washington State Highway Commission 6 pages) This contract dealt with water and fish rights retained for 2326 N.155<sup>th</sup> St when the freeway came through.

The present headwaters of Thornton Creek are Ronald Bog, and that main flow water goes through Twin Ponds where it joins with the Historical Western Channel. We speculate the main flow coming from Ronald Bog was greatly increased after the removal of the peat from both Ronald Bog and Twin Ponds. This possibly created the larger flow from the north/Ronald Bog tributary. (See Attachment #4 Seattle Public Utilities Thornton Creek Watershed Map)

Other Points are:

- The Densmore Watershed so described in the EIS document seems to have been considered an impact. Has there ever been a representative from this watershed at a public hearing. Have they been informed as far down as Green Lake & Lake Union where this water will end up? The stormwater from this job will directly reach 1. The Puget Sound 2. Lake Washington 3. Lake Union through multiple stream conveyances. This is not strictly a local issue when it effects water. This project effects the entire region. Has comment from those effected areas downstream been solicited by the City of Shoreline about this projects effects on them?
- Highway 99 runs through at least 4 separate, but over-lapping water sheds in Shoreline. This EIS was supposed to be based in science. The fact that this project is split up by man-made

surveyed lines through the middle of a watershed, in which you plan to work on both sides of the line but only examine one side at a time. Is this biology? We will never know the full extent on the environment caused by this project unless it is looked at completely from where the water starts and takes a pursuit of the truth (science) downstream to where it is going to be deposited.

- This projects storm water compliance is based on general construction standards. Thornton Creek is under the ESA standards. Where are the protections for the fish? Proper protection standards for salmon creeks and especially creeks that support endangered species need to be implemented above and beyond general development standards.
- All Shoreline creeks contain salmonids. All salmonids are considered priority species worthy of special protections by Washington State Fish & Wildlife Habitat Management Plan for Salmonids. The values of these fish to us or the fishes own specific needs were not fully addressed temperature of storm water is a big concern for discharging storm water into a fish creek and the projects impacts on temperature were not addressed. Existing conveyance is not being upgraded. This conveyance is already well over capacity as is reflected by The City of Shorelines Capital Improvements Projects. Taxpayers are spending millions on Ronald Bog to update old conveyance that is failing and causing damage to homeowners and the same on Third Ave NW. There is a long waiting list for other areas with drainage problems.
- The Shoreline Sinkhole was highlighted with national news coverage and our city was bailed out with federal disaster funds for this drainage collapse.
- The new system being planned is to only handle the net additional impervious surfaces added by the project. This ignores the fact that existing impervious surface that now drains to a built, but non-channelized environment.
- Present flows are not channalized or collected by a system of curbs and gutters. Some natural soil absorption of storm water runoff happens now in it's pre-project state.
- All storm water within this project is going to be channeled and captured including the flows from the old existing impervious surface. This will create a man made river down the highway, Old and new surfaces being connected and creating a flow as large as the entire highway directed towards capturing devises (catch basins).
- The catch basin technology this project offers only consists of oil filtering capabilities. Large acreages of auto habitat is being created with this project. Autos drop or leak on to the pavement other fluids such as antifreeze and gasoline at a higher rate than oil. Oil water separators are merely a catch basin with a "T" in it and do not filter water-soluble pollutants.
- The impact for the unaccounted impervious surface is not being addressed or handled by this project. Therefore, storm water projections in the EIS are incorrect.
- The stream inventory is not being released. All of the relevant biological information on our streams in the City of Shoreline is being withheld from the public. The stream inventory was to be a tool used during land use decisions that would protect our natural resources.
- Not only is Best Available Science not being used but also Available Science (stream inventory) is being withheld from this process. Why? Does it offer what we as citizens paid for, a tool that would help protect our natural resources from bad land use decisions.

14817 Aurora Avenue North,  
Seattle, Washington 98133.  
Mosse Kim.

Log # 64g

To ; 소라인 시청.

## 의 건 서

1. 너무 막대한 예산을 들이 하는 공사업은 주민들의 더 많은 의견을 들을 수 없는  
전문가들로 하여금 신중하게 결정할 후에 장안철을 고려하고 착공해야 할 것이며  
무엇보다도 지역경제의 활성화를 위해서라도 주민들의 생계에 별로 지장을 주지  
않고서 지조보다도 장사들을 더 갖출수 있는 방안과 도움을 줄수 있는 대책을  
강구할수 있도록 공사가 완결되고 20-30년 후까지는 잘 갖다줄 소외를 들을수  
있는 계획이 아전원 후에 실행되길 바랍니다.
2. 시의 정책으로 곧 주민들의 편익을 위한 바깥위이니 마련되어야 한다고 보기  
때문에 앞의 부지기수 정책보다도 조금은 늦더라도 때때로 주민들의 의견을 듣고  
반영하여 건설하는 접근안이 아전원 후에 착공해야 한다고 보고 있으며. 거시적으로  
이용상으로 편리하게 하고 신중을 중심으로 처리해야 하회전이 너무 빨리 움직여  
하여 부러져서 미칠것을 우려한 기간별로 정하는것을 반대합니다.
3. 공사기간동안 주민들의 피해를 최소화하고 특히 중공사비의 바깥에 갖춰서  
자꾸미는 중앙분리대라 미칠기간이 조화있게 이루어져서 주민과 운전자와 방문객들  
별로 불편함없이 이용할수 있도록 미칠기간의 바깥에 갖춰서 다양성 있는 공사가  
되어 주민들의 공안이 생긴 공사를 하여 주시길 바랍니다.

2002. 8. 6.

김 모세 Kim.

## Log # 64g

August 6<sup>th</sup> 2002  
Moses Kim  
14817 Aurora Ave. North  
Shoreline, WA. 98133

To: Shoreline City Hall

- 64g-1 | 1. Greater attention must be paid to the opinions of the people living in the surrounding area as the budget for any construction becomes greater and greater. Professionals in charge must seriously research all aspects of the project and weigh the pros and cons of the project before commencing with the project. Above all else, for the prosperity of the local economy, the project must not seriously affect the livelihood of the people living in this area. I would like to see actions taken to aid and improve business activities in the surrounding area. I hope you will begin this project with full consideration that 20~30 years after completion of the project, people will still consider this project a job well done.
- 64g-2 | 2. I view the city as an entity that exists for the convenience of the citizens of the people. I believe that instead of forcing a project, though it may be a little late, the city should listen to the opinions of the citizens of the city, compile majority opinion, and follow their wishes. Any construction that takes place must take into consideration driving convenience and ease of accessibility to local businesses. The left and right turns must not be too far from the businesses. I am completely against constructing a median with intermittent turning areas without taking any of the above into consideration.
- 64g-3 |
- 64g-4 |
- 64g-5 | 3. During construction, the inconvenience to the citizens of the city and the businesses must be minimized. Future constructions of medians and signal lights must be in harmony with the local citizens, the drivers and visitors. It must not cause too much inconvenience to the accessibility of the customers of the local businesses. I hope you will conduct a reasonable construction project with the greatest consideration from the citizens of this area.

Moses Kim  
Four Seasons Owner



# Four Season Restaurant

15740 Aurora Ave.

N. Shoreline, WA 98133

To. City of Shoreline

64g-6

We object road construction in Aurora Ave.

Reason to object

64g-7

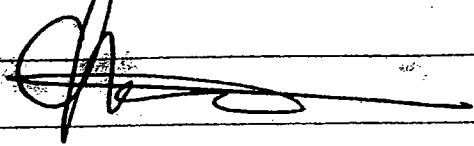
1) we already have very small parking lot. If road construction starts, our parking space getting much smaller and only few spaces available. Then where our customer should park?

64g-8

2) If construction begins, you'll block front of our restaurant's way. Then, customer getting hard to enter in. We will lose our customers.

3) We pay off our rent fee very hardly right now. If situation getting worse than now because of construction, how we going to survive? Would you compensate for loss?

Four season owner

\* 

\* Imen cho

employees.

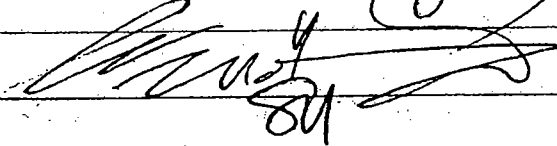
\* Sejem / Kiri

\* Gustavo B L.

\* Rigoberto VAZQUEZ V

\* ORLANDO Garcia D.

\* July, Kiri

\*   
81

Log # 64h

De bon Cosmetic

14703 Aurora ave n

Shoreline. WA 98133

Phone 364-8322

Aurora ave 에 중앙분리대를 만드는 것을 절대 반대합니다.

그 이유는 다음과 같습니다.

1. 승합차의 많은 감소가 예상 됩니다.
1. 그에 따른 이유는 사업의 부진으로 이어져 종업원 해고와 사업주도 막대한 수입 감소가 예상되며 물론 시의 세액도 감소 될것입니다.
1. De bon 의 주 고객은 한국 분들로 대부분의 승합차는 30~50대 여성 분으로서 운전이 아주 익숙치 않습니다. 상점을 지나쳐 남쪽 또는 북쪽에서 나뉘어 함으로써 사고가 다발 할수 있습니다.
1. 많은 시간과 경제적 낭비를 가져올것입니다 (고객)+(사업주)
1. 중앙 분리대를 만들것이면 보행자를 보호 하고 차사고를 줄이기 위험이라면 더욱 이유가 합당치 않습니다,
  - A. 많은 운전자 가 나뉘어 함으로써 사고는 더욱 다발할것이며
  - B. 더욱더 많은 교통 체증을 야기 하여
  - C. 보행자는 지금(현재) 보다 더욱더 아무곳에서나 횡단을 할것입니다.
  - D. Shoreline 시의 예산을 낭비 할것입니다,
1. 보행자를 보호하고 사고를 줄이기 위하여라면 중앙 분리대를 만드는 따위의 예산을 낭비 하기보다는 속도 제한을 낮추는것 과 보행자를 위한 횡단로나 육교를 만드는것이 훨씬 많은 사고를 예방할수 있다고 생각합니다.
1. 중앙 분리대를 만들므로 인하여 득보다는 손해가 많은것은 주민, 식당주, 상점주, 모두가 될것입니다.
1. 중앙 분리대를 만드는것의 부당한 이유는 위에 적은것보다 더 많은 정당한, 합당한 이유가 있습니다.

Debon Cosmetic

## Log # 64h

Debon Cosmetics  
14703 Aurora Ave. N.  
Shoreline, WA 98133  
Tel: (206) 364-8322

64h-1

I am absolutely opposed to the construction of a median on Aurora Ave. The reasons are as follows:

64h-2

1. I expect a great decrease in customers.
2. Following the decrease in business will be the layoff of employees, a great deal of decrease in revenue, and a decrease in the level of taxes collected from businesses.
3. The main clientele of Debon is Korean women, in their thirties to fifties, whose driving skills are not very good. They could get into an accident trying to make a U-turn after passing the shop going north or south.
4. It will bring about wasted time and loss of economic resources for the customers and the business owners.
5. If the median is to be put in place to protect pedestrians and decrease accidents, then the reasons for this project make less sense.
  - a. Many drivers trying to make U-turns will cause many more accidents
  - b. There will be greater congestion.
  - c. Pedestrians will J-walk anywhere, more frequently than present.
  - d. It will be a waste of budget for the city of Shoreline.
6. If the main purpose of this project is to protect the pedestrians and reduce accidents, the city should abstain from wasting money on medians and use it instead to reduce the speed limit and create crosswalks or pedestrian overpasses. I feel this will prevent accidents much more than the alternative.
7. By constructing the median, it will lead to a greater loss than gain for the landlords, restaurateurs, business owners, and everyone else.
8. There are many additional logical and appropriate reasons why the construction of the median is unreasonable.

64h-3

Debon Cosmetics

Chong B Yi  
6935 DelridgeWay SW  
Seattle, WA 98106  
August 4, 2002

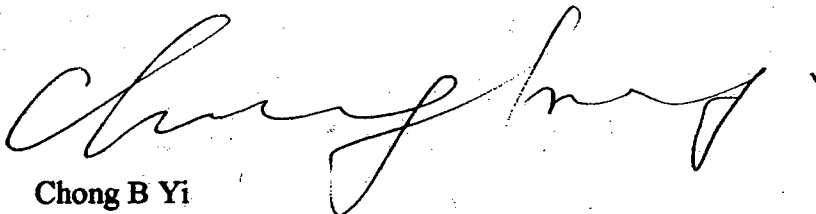
City of Shoreline  
Planning Department  
Timothy Stewart

Dear Mr. Stewart,

64:-1  
Hello, my name is Chong B Yi. I live in West Seattle. I found a location for opening my business in 99 145<sup>th</sup> St. and 165<sup>th</sup> St, but I'm considering about whether if I should open my business in the freeway 99 in Shoreline, because I heard that there would be a median strip made in 99 while searching in that area. I think that the median strip would make the customers uncomfortable, thereby making the business inefficient. And also, during the construction, there wouldn't be any business for me. Therefore, I'm avoiding the thought of opening my floral business at that location. Because I have many experiences about business, I believe that if the median strip is placed in 99, most of the businesses will be affected. Furthermore, because the economic situation isn't very good, I'm guessing that during the time of construction of the median strip, most of the business would fall. Thus, I hope that from the city, you will consider about that area more carefully.

Thank you for reading my letter.

Sincerely,



Chong B Yi

Kim's Photo Studio  
15200 Suite B, Aurora Ave. N Seattle WA 98133  
(206)363-0987, (206)362-2044(Fax)

From : David Kim  
Re: Aurora Ave. Renovation Project

8/15/02

Dear Sir,

64j-1 I own and operate a business by Aurora 152<sup>nd</sup> Street since 1995. Upon reviewing the Environmental Impact Statement, I was surprised to see proposals including 16 ft wide raised median extending numerous blocks and wide sidewalks. I concluded that the proposed plan A and B will inevitably kill or impede the business around Aurora as pointed out in the report but in much wider scale as I estimate. I hope you policymakers don't confuse wish-list with bare-bone-essentials municipal government is expected to provide without mistake.

64j-2 I believe priority should be placed on public safety, efficiency of traffic and economical impact. I am questioning what the 16 ft wide raised median will serve? It will not help traffic efficiency for sure. Instead, It will kill numerous businesses and impede the business activities in overall by turning customers off by making the access difficult. We, as a merchant, understand the consumer's instinct and know what to do (or what not to do to) in order to turn it into positive business. 64j-2A I am sorry to find plan A and B don't reflect any understanding of this nature.

I personally will might have to move after this lease term expires if the raised median is to be installed as plan A or B because I know what this will do to my business. This means at least \$ 50,000 of unexpected relocation expense for me and I am not sure I would keep the same business base elsewhere. It is very hard for me to allocate that kind of money for a move in this business climate which is already pushed my business into borderline profitability.

64j-3 With the kind of proposed budget of \$50 million/mile, you should be able to find a way to increase the public safety and traffic efficiency without 16feet wide dinosaur in the middle. 64j-4 I am for the so called plan-C proposed by Aurora Merchant Association. Thank you for consideration and please don't make it any more difficult than it is now for merchants.

Sincerely David Kim (206-362-2344)

*Signature* 8/15/02

Aurora Oriental Market  
15202 Aurora Ave North  
Shoreline, WA. 98133  
Byong Soon OH

To : 쇼어라인 시청

의견서

당국(쇼어라인시)의 A.B.항을 반대합니다.

① 회전공간이 멀쩡하니라 공사비가 많이 드는  
물리대의 설치를 반대합니다.

② 지역 경제의 활성화를 위해서라도 지역  
상인들의 장사(생업)에 지장이 없도록  
배려하여 주시기 바랍니다.

③ 불행치만 땅지은으로 불행 구역도 현상에  
맞추어 조정하여 주시기 바랍니다.

2002년 8월 15일

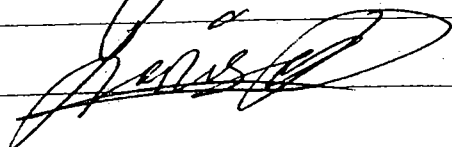


Walter Johnson

Byong Soon OH

Lee Soan OH

Jung S. Kim



## Log # 64k

Aurora Oriental Market  
15202 Aurora Ave. North  
Shoreline, WA 98133  
Byung Soon Oh

To: Shoreline City Hall

- 64k-1 | I am opposed to the A. B. proposal of Shoreline City.
- 64k-2 | 1. It would not only distance the turning location from the businesses, but the construction of the median would cost too much money. I am against it.
- 64k-3 | 2. I hope you will be considerate enough to make sure there is no negative affects on the businesses, so that the local economy will improve.
- 64k-3 | 3. I hope you will be realistic in creating pedestrian crossing areas for there are only a few pedestrian crossers.

August 15<sup>th</sup>, 2002



Log # 641



케익전문점 -

로얄 제과  
ROYAL BAKERY

• Wedding Cakes & Birthday Specialist  
• Cakes & Pastries For All Occasions

☆ 각종 한국빵 ☆

15210 Aurora Ave. N.  
Shoreline, WA 98133

(206) 362-5188  
David S. Hwang

Royal Bakery

15210 Aurora Ave N.

Shoreline, wa. 98133

Shoreline City에서 주권공인 99번 도로 불리대 선크리브  
반도 남쪽으로 반대쪽이다.

1. 기준으로 교통량이나 많이 북향한 도로를 종전대로  
이리쌍 쪽의 도로 (많은 도로를 들어서)

2. U-Turn을 할수있을 때면 100%의 양방향 도로  
양방향으로 많이한 도로를 기준으로 이어질것이다.  
또한, 때때로만 100%의 양방향 도로를 양방향으로  
그의 Shoreline을 따라 다른 City로 양방향으로  
통행하게 될것이다.

3. 또한 많은 도로를 들어서 그런 경우를 잘게 하거나  
Cynwood City같은 작은 도로를 들어서 교통량으로  
위험하게 움직이지 않고 양방향으로 움직이는 것이  
그의 재개발에 따른다 시도를 잘하게 될것이다.

4. Cynwood City 같은 도로에서 양방향으로  
양방향으로 움직이지 않고 양방향으로 움직이는 것을  
위험하게 하지 않고 양방향으로 움직이는 것을  
양방향으로 움직이는 것을

2132 이 건물 마네프 City에서 한층더 높으신  
 아래 한 층 City에 상하 두 층 사이에서  
 하나 한 층 두 층 한층 두 층 한층 두 층.

(Owner)

DAVID. S. HWANG

WANG  
D. Paul S. Wang

young jin seo

② Saoguang Tu

(3) Grace N. Haway

## Log # 641

Royal Bakery  
15210 Aurora Ave. N.  
Shoreline, WA 98133

- 641-1 | I am against Shoreline City's project to insert medians and widen the pedestrian walkways on highway 99.
- 641-2 | 1. It makes no sense to make the already congested street narrower. (Spending all that money.)
- 641-3 | 2. If U-turns are prohibited, our business, and many other businesses, will witness a great decline in revenues. As a result, the business owners will only stay in Shoreline until their leases are finished and then move their businesses to another city.
- 641-4 | 3. Instead of spending a great deal of money on this project, Shoreline should do what the city of Lynnwood did. They spent far less money, their traffic is less congested, and they have far fewer accidents. This will save the city budget and taxpayer dollars.
- 641-5 | 4. If it were a road construction project like the city of Lynnwood, I would support it. It allows for greater flow-through of traffic, ease of access to places for drivers, and will lead to a decrease in accidents as a result of unobstructed view.
5. If a median is inserted, the pedestrian crossers and the drivers may not be able to see each other and cause an increase in the number of accidents. If the road is narrowed, many drivers, trying to go their own busy way, will be angered by greater congestion. Who, then, will be the victims of this construction project?

We hope the city will take our thoughts and opinions into consideration. I hope you will make the right judgment as to what course of action will benefit the business owners and the citizens of the city.

August 13<sup>th</sup>, 2002

David S. Hwang  
Owner

old village Korean Restaurant

15200 Aurora Ave N.

Shoreline WA 98133

Log # 64m

TO: 슈라인 사장님 의 말씀

1. 너무 막대한 예산을 들여하는 행사만큼 주민들의 의견과 의견을 수렴하여 민중이 되도록 하여주신 것임에 감사드립니다. 2. 또한 예산을 고려하고 주공공해바다에 무엇보다 지역 경제의 활성화를 위하여 주민들의 생활에 지장을 주지 않도록 지냈는데 감사드립니다. 더 많은 주민들의 의견을 반영하고 도움을 주시길 부탁드립니다.
2. 시의 정책을 늘 주민들의 편익을 위한 방향으로 마련하여 왔는데 보기 때문에 조금 늦더라도 대다수 주민들의 의견을 듣고 반영하여 반영하는 편향성이 마련된 후에 주공공해바다 주민들을 중심으로 지켜본 우리편이 너무 많지 않도록 하여 불리하게 처한 할수있도록 우선순위를 정하는 것은 바람직합니다.
3. 공사기간 동안 주민들의 피해를 최소화하고 특히 교통사고는 비례에 맞춰서 화물차도 중영불리하다 처한 기간이 조화롭게 이루어져서 주민의 불편사항을 반영한 것들이 분명히 많이 있어 이점 감사드립니다. 최대한 다양한 의견을 공신시킬 바입니다.

## Log # 64m

Old Village Korean Restaurant  
15200 Aurora Ave. N.  
Shoreline, WA 98133

To: Shoreline City Hall

- 64m-1 | 1. Greater attention must be paid to the opinions of the people living in the surrounding area as the budget for any construction becomes greater and greater. Professionals in charge must serious research all aspects of the project and weigh the pros and cons of the project before commencing with the project. Above all else, for the prosperity of the local economy, the project must not seriously affect the livelihood of the people living in this area. I would like to see actions taken to aid and improve business activities in the surrounding area.
- 64m-2 | 2. I view the city as an entity that exists for the convenience of the citizens of the people. Though it may be a little late, it is my hope that the city will listen to the opinions of the citizens of the city, compile majority opinion, and follow their wishes. The left and right turns must not be too far from the businesses. I am completely against constructing a median with intermittent turning areas without taking any of the above into consideration.
- 64m-3 |
- 64m-4 |
- 64m-5 | 3. During construction, the inconvenience to the citizens of the city and the businesses must be minimized. Future constructions of medians and signal lights must be in harmony with the local citizens, the drivers and visitors. I hope you will conduct a reasonable construction project with the greatest consideration for the citizens of this area so that it will not cause too much inconvenience for the customers of the local businesses.

August 15<sup>th</sup>, 2002  
Kyung S. Kim



Log # 64n

# CITY OF SHORELINE

## AURORA CORRIDOR

TRANSPORTATION SOLUTIONS FOR SHORELINE'S MAIN STREET

Aurora Avenue 145-165 Open House August 6, 2002

General Public Comment Form -- Not for EIS

Name Lotte Gifts Shop

Address 15001 AURORA AVE. N.  
SHORELINE, WA 98133

Phone (206) 365-9732

08.13.02

### Comments:

To Whom It May Concern,

Hello, my name is YungHwa Kim. I own a small gift shop in Shoreline. I'm writing to you about my concerns on this project of the AURORA Avenue North Multimodal Corridor Project. I know that you guys would like to create more of a beautiful atmosphere here in AURORA but I just don't think this would benefit a lot of people.

64n-1

By building this mid-block it will distract a lot of businesses, no matter if there big or small businesses.

64n-2

Most importantly these stores will lose customers because of the hassle of having to turn around at the next cross section available. For an example, let's say that a customer coming from the north bound would like to stop by a store to pick something up and guess what, the store is located in a plaza on the left hand side. And, having a mid-block blocking the customers to make a left turn soon businesses would no longer customers, which means not making enough money to support the store & would resulting in having to move out to a different location, out of Shoreline. Please take our opinion

(small businesses) into consideration. not going furth writ the project. Thank you for your plan to listening to me!

Please leave your comments with us tonight or mail your comments to:

Timothy M. Stewart, AICP, City of Shoreline, 17544 Midvale Ave N, Shoreline, WA 98133-4921

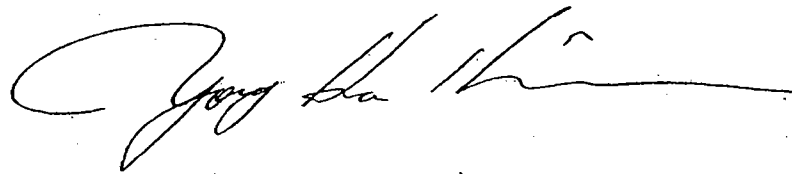
Comments must be received no later than Friday, August 16, 2002 5 p.m.

364

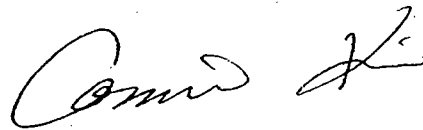


And, please think twice before you take  
action. Have a nice day.

Someone with concerns,

A cursive handwritten signature that reads "Yong Hwa Kim". The signature is fluid and elegant, with a long horizontal stroke at the end.

Yong Hwa Kim

A cursive handwritten signature that reads "Connie Kim". The signature is more compact and stylized than the one above.

Connie Kim

8/16/02

상호: 미상 거주

주소: 15033 Aurora Ave. N WA 98133

전화: 206. 411. 3158

- 1) 미상 쪽쪽 도록 중반에 보리씨 (라쓰)가  
생애에서 전파이념을 쓰는 것은 전략이 매우 좋게  
행동하는 데서도 보인다.
- 2) Exit 15에서 나가는 (freeway I-5) 도로를  
Aurora 가에서 165 가를 지나서 자리잡고 계시는 것은  
나 전해서 모든 행동이 매우 소중하게 생각됩니다  
주제에 따르면 매우 많이 생각됩니다.
- 3) 라쓰 3~4년간 가게를 하면서 자취한 것은  
도록변 가까이 계시는 사람들이 많은 것을 이용하여  
은 소중함이 더 많이 보여주고 모든 행동이 보리씨 (라쓰)  
생각을 매우 빨리 가게는 모든 사람들 (행동) 받게 됩니다.

Yi Tae H



## Log # 640

Business Name: Yedang Furniture

Address: 15033 Aurora Ave. N. WA 98133

Tel: (206) 417-3758

- 640-1 | 1. If a median appears in front of our business, large container trucks carrying furniture to our shop will not be able to freely come and go.
- 640-2 | 2. If people come off of exit #175 from I-5, they would have to go to 165<sup>th</sup> St. and make a U-turn or a left turn. This will inconvenience our customers and will lead to a decline in business revenues.
3. From my 3~4 years of conducting business in this location, I have personally seen that most people come to our shop by car, as opposed to walking. If the median is put in place, it will be a very negative impact on our business.

Tae H. Yi

**HANA TRAVEL AGENCY**

---

15017 Aurora Ave North Seattle, WA 98133

August 15, 2002

To Whom It May Concern:

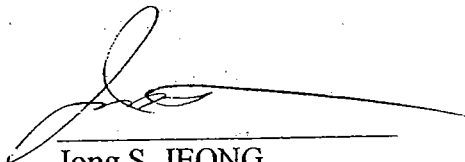
First of all please let me thank you for your service.

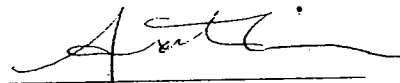
64p-1 | Having been recently advised the city is planning on blocking the center lane along the Aurora Avenue where people are currently able to take left and right turns into the business area, we are stunned at the thought of the impact of business loss this might bring about.

Consequently we come to cordially request that you should come up with other plans to not block the lane, but to make it a safer driveway so that drivers and pedestrians are able to freely make turns and cross.

Your consideration in the matter will be highly appreciated.

Sincerely,

  
Jong S. JEONG  
Manager

  
Jiah KIM  
Travel Specialist

JOHNNY S. LEE, D.D.S.  
GENERAL DENTISTRY

Log # 64q

15013 Aurora Ave. N.  
Seattle, WA 98133  
TEL: (206) 364-7731  
FAX: (206) 364-8011

14 August 2002

Attn: Mr. Kirk Mckinley  
Project Manager  
Department of Public Works  
City of Shoreline

Re: Aurora Corridor Project

To whom it may concern:

64q-1 As a business owner in the city of Shoreline, I am writing to express my concern to your proposed project. As a whole the development and redesign of the corridor are essential and needed; however, the placement of continuous center median will gravely affect many successful businesses in the region. This construction will prohibit all north and south bound vehicles maintaining accessibility to the existing businesses. Please reconsider your plans to leave the center lane for easy access to the businesses in the Aurora corridor.

Sincerely,

  
Johnny S. Lee, D.D.S.

작은 강 명에 Qvest INN 주인입니다

Shredline 사에서 제의하는 은근히 길에 간혹해서

시에서 제의하는 A항나 B항에

작사 바래들었다 인하여 Shredline 사 상의 면허에

나 제의하는 C항에 작대 지지 합니다

C항은 지금 현재 마스비하고 있는 상인들에게

부리항을 주지않는 가장 현명한 방법이기 때문에

C항을 지지 합니다

8/16/02

미구 - CL

## Log # 64r

My name is Myung-Ae Chang, the owner of Quest Inn.

64r-1 | I am completely against proposal A and proposal B created by the city of Shoreline.  
64r-2 | However, I am completely in favor of proposal C, created by the local business owners' association. I am in support of proposal C because it is the most reasonable, and it will bring the least amount of negative impact on the existing business owners.

August 16<sup>th</sup>, 2002  
Myung Ae Chang



분식일체/ 칼국수 전문/ 우동/ 만두

Koryo Bakery



교러당 분식

각종 한국빵/ 생일·결혼 케익

Mom's Teriyaki

(206) 367-3220



15200 AURORA AVE. N. #C, SEATTLE, WA 98133

Log # 64s

Mom's Teriyaki

OK YON REED

분식은 상인연합회에서

발간하는 "C" 2권 찬성함

Ok you had



Log # 64t

677 Woodland Square Lp SE  
Lacey, WA 98503

P.O. Box 3485  
Lacey, WA 98509-3485

(360) 493-6002  
(360) 493-2476 Fax

sca@scaconsultinggroup.com  
www.scaconsultinggroup.com

August 16, 2002

Timothy M. Stewart, AICP  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133

**RE: Aurora Avenue North Multimodal Corridor Project: North 145<sup>th</sup> Street to  
North 165<sup>th</sup> Street – Environmental Assessment and Draft Environmental  
Impact Statement  
SCA #02130**

Dear: Mr. Stewart

Attached are my comments on the referenced Environmental Impact Statement. These comments are submitted on behalf of the Shoreline Merchants Association by which I have been retained.

Sincerely,  
**SCA Consulting Group**

Thomas W. Holz

TWH/nc  
(f:\text\project files\02130\corres\Stewart081602)

# **Review and Comment on Environmental Assessment and Draft Environmental Impact Statement**

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**August 2002**

DESIGN/BUILD • CIVIL AND TRANSPORTATION ENGINEERING • PLANNING • SURVEYING



314



The following are observations resulting from our reading of the proposed project and recommendations for improving the project.

### THE EIS FAILS TO DESCRIBE THIS AS A "HIGH IMPACT" PROJECT

The EIS does not mention that percentage of effective impervious surface is an important criterion in assessing the impact of a project. There are two broad genres of development standards:

- High impact
- Zero (or very low) impact

The literature shows clearly that end-of-pipe management of stormwater from high-impact development is ineffective in protecting a stream. Thus, if a policy of restoration for the receiving waters were adopted in future, this project would be in conflict because it is incompatible with such a policy.

The EIS does not acknowledge the distinction between high- and low-impact standards nor does it point out that this is a high impact redevelopment project.

The proposed redevelopment project will perpetuate a percentage of effective impervious surface that is far more than that necessary to destroy a stream (if the entire basin were redeveloped with the same level of intensity). Thus, this project tacitly declares that city policy is not to restore Thornton and Boeing Creeks to the level that would sustain salmon runs. As the fundamental reason for writing an EIS is to describe such policies, it must be concluded that it is fatally flawed.

### The City's Proposed End -of-Pipe Stormwater Management

The city's proposal for this project is 30-year old, largely discredited technology. It plans to rebuild Aurora Ave with curb, gutter, catch basin, and pipe collection systems. It is then proposed to discharge runoff to surface water thus making all impervious surface hydrologically "effective". Runoff will be detained briefly in vaults and released to streams. From the description in the EIS, it is apparent that no consideration was given to alternate approaches such as low impact design.

## Agencies Recognize the Irreversibility of High Impact Development

In the past few years the listing of threatened species in the Puget Sound Basin has caused a metamorphosis in the scientific community's views on stream protection and restoration. There is an awakening to the fact that we have badly mismanaged stormwater runoff.

Beginning with the Salmon in the City conference in 1998, there have been a number of conferences and papers that declared that end-of-pipe stormwater management practices do not work to protect streams and aquatic life, regardless of their size and sophistication. May (1996) has demonstrated that impervious surface in the smallest percentages in a watershed can cause dramatic degradation. Beyerlein (1998) has shown that no amount of storage can mitigate for clearing and paving a watershed. Horner and May (1999) have declared that the effects of poor land use practices cannot be mitigated to any significant degree, and that low impact development is the only method for reducing impacts arising from turning forests to human use. Woodworth (2002) proposes that low impact redevelopment is the only reliable approach to address receiving water degradation in the District of Columbia. The Washington State Department of Ecology, in its Stormwater Management Manual for Western Washington (Volume 1, Section 1.7), states that "The engineered stormwater conveyance, treatment, and detention systems advocated by this and other stormwater manuals ... cannot replicate the natural hydrologic functions of the natural watershed that existed before development, nor can they remove sufficient pollutants to replicate the water quality of pre-development conditions. This is because land development, as practiced today, is incompatible with the achievement of sustainable ecosystems" (Section 1.7.5).

The problem of the failure of engineering remedies for high impact development is recognized in Governor Locke's *Statewide Strategy to Recover Salmon* (1999, Joint Natural Resources Cabinet of the Governor's Salmon Recovery Office). This document states, "there is strong evidence that we cannot adequately protect high quality stream ecosystems from the impacts of development through 'managed' or 'engineered' solutions" (Section IV, Page IV.113). Furthermore, "Stormwater management programs and practices are able to only partially mitigate the degradation of salmon habitat caused by new development or redevelopment" (Statewide Strategy, 1999. Section IV, page IV.118).

The Puget Sound Water Quality Authority has conducted a series of seminars around the Puget Sound Basin to inform us that end-of-pipe stormwater management is ineffective and that low impact development techniques are the only solution. The Washington Organic Recycling Council has sponsored a series of seminars called "Soils for Salmon" that have touted zero impact development as the only alternative to stream degradation (apart from no development).

Washington's Water Quality Management Plan to Control Nonpoint Source Pollution also recognizes the critical need to change development standards in order to protect aquatic habitat. In the chapter on Implementation Strategy it states "Identify and participate in a zero

impact stormwater demonstration project" as an activity that should take place before 2004 (Urb 15; Table 9.1).

The United States Office of General Administration submitted a report to the US Congress in September 2001 which stated that high impact development cannot be mitigated and that low impact development practices must be encouraged.

From the foregoing, it is obvious that there has been a sea change in the approach to stormwater management. All of the state's agencies with mandates to protect streams acknowledge that source control is the only effective way to protect streams in the path of development (or redevelopment). This change is critical to a correct analysis of a project's impact on the environment and it must not be ignored in this EIS.

### **Stream Restoration is Likely Policy Choice**

Many indications of a public demand for the protection and restoration of these streams can be referenced. A few of many examples include:

- Initiative 80 Save Seattle Streams (signature gathering now on-going).
- The 25 acre-foot stormwater pond proposed in Jackson Park Golf Course
- The Thornton Creek Alliance citizens group initiative to daylight Thornton Creek
- The City of Seattle proposal to daylight portions of Ravenna Creek

### **The Project Must Fit Into A Broader Context of Water Resources Policy**

644-3 The first issue that should be addressed in this EIS is whether the City will commit to restoring the creeks that will receive runoff from the project. It is in this context that Shorelines should be considering the character of redevelopment in this arterial corridor. The EIS is not meaningful if this issue is not addressed for it is clear that a continuation of the current tacit policy (and the implementation of the current proposal) will not lead to stream restoration and the affected streams will be fated to remain in their current very degraded state.

If the City policy is not to restore urban streams, then the EIS should make this policy clear. In that event the described proposal will probably not do the streams significant additional harm as they are already well beyond the threshold of biological integrity necessary to support salmon runs.

If the City commits to a policy of stream restoration, the project, as configured, would not meet zero impact standards (ie, those which would provide protection to a restored stream). It should be redesigned to approximate zero impact development standards. The project could then serve as the cornerstone of redevelopment in the basins.

## TECHNICAL COMMENTS

If the city will not commit to stream restoration on its urban creeks, then the following comments are provided to address the technical merit of the present proposal. These items are inadequately addressed in the EIS.

- 644-4 | 1. Existing Stream Condition Not Stated. The chemical water quality parameters used to describe the current condition of the stream are inadequate to describe stream health. These parameters make the creeks appear to be in fair condition when they are clearly recognized as ranking among the most degraded streams in the Puget Sound Basin. Benthic Index of Biological Integrity (B-IBI) data are available for Thornton Creek and should be reported. If available for Boeing and Green Lake Basins, these should also be reported.
- 644-5 | 2. Offsite Run-on Not Addressed. How will runoff from adjacent properties tributary to the project be managed? If facilities will not be sized to treat and detain runoff from offsite to DOE standards, will flow by-pass be included? It is the policy in most jurisdictions that un-managed runoff tributary to a public project is incorporated into the project.
- 644-6 | 3. Wet Vault Treatment. The Department of Ecology SWWMM requires a treatment train for runoff from highways and arterials. This manual has been available since August 2001 and must be adopted by jurisdictions in western Washington. Adoption of the manual will undoubtedly be made a condition of Shoreline's NPDES permit. The proposal does not adhere to requirements shown in Volume 5, Table 3.2, page 3-7. If the proposal is to use a wet vault for treatment, a sand filter must follow the vault.
- 644-7 | 4. If a vegetated median and "amenity" strips are to be project features, why were they not designed as bio-retention facilities to treat and reduce runoff? The EIS should address obvious alternatives to the proposal.
- 644-8 | 5. It is difficult for the reader to understand the stormwater management proposal. A map showing the location of proposed stormwater facilities, outfalls, existing conveyance systems, and receiving waters is a fundamental element of an EIS. It should be included.
6. Cumulative and Secondary Impacts. Will the policy of non-restoration of urban creeks extend to McAleer Creek?

## REFERENCES

Beyerlein, D., and J. Brascher, 1998. *Traditional alternatives: Will more detention work?* In: Abstracts of Salmon In the City conference, May 20, 1998, American Public Works Association, Washington Chapter.

May, C, 1996. *Assessment of cumulative effects of urbanization on small stream in the Puget Sound lowland ecoregion: implications for salmonid resource management.* Doctoral dissertation. University of Washington.

Horner R.R. and C.W. May. 1999. *Regional Study Supports Natural land cover Protection as Leading Best Management Practice for Maintaining Stream Ecological Integrity.* In: Proceedings of the Comprehensive Stormwater and Aquatic Ecosystem Conference, Auckland, NZ. Sponsors: Auckland Regional Council; United States Environmental Protection Agency; Ministry for the Environment, NZ. Published by New Zealand Water and Wastes Association, Inc. Vol 1, page 233 ff. ISBN 1-877134-18-X

Joint Natural Resources Cabinet of the Governor's Salmon Recovery Office, 1999. *Statewide Strategy to Recover Salmon – Extinction is Not an Option.* State of Washington Governor's Salmon Recovery Office. PO BOX 43135, Olympia, WA 89504-3135

Washington State Department of Ecology, October 1999. *Water Quality Management Plan to Control Nonpoint Source Pollution.* Washington State Department of Ecology Publication Number 99-26.

Woodworth, JW; Clarke, GA; Huang, W; Stoner, N; July, 2002. *Out of the gutter.* National Resource Defense Council, NRDC Publications Department, 40 West 20th Street, New York, NY, 10011



August 13, 2002

Aurora Corridor Responsible SEPA Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133-4921

Dear SEPA Official:

A-1-1 I support Alternative A. I think Alternative B is dangerous. I believe in a planted median and object to the current left turn lanes commonly referred to as suicide lanes. They are dangerous and should not be allowed on streets with this much traffic and with speeds between 30 mph and 40 mph. I believe in amenity areas between the street and the sidewalk where people walk. I believe in green space where water can drain into the soil rather than concrete and gutters even though the water may be filtered. Our environment needs more plantings. I believe our personal well being requires more plants. I support the business people who have concerns about blocking their businesses with trees. Trees should be spaced apart at least 40 feet. They should be limbed up. They probably do not belong in the median  
A-1-2  
A-1-3 because a pedestrian may not be seen if crossing the street and near a tree. But trees in the amenity strip would look great. I also support planting grass wherever possible. Chuck Olson and Hollywood Video have done a great job with the grass in front of their businesses. I hope more businesses can do this. I support Alternative A and hope that you recommend it.

Sincerely,

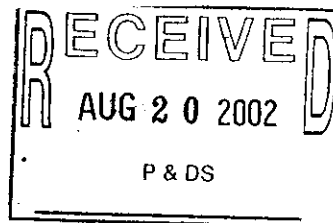
*Lindsay Sanagustin*  
Lindsay Sanagustin  
19829 8<sup>th</sup> Ave N.W..  
Shoreline, Wa 98177



**King County  
Department of Transportation  
Metro Transit**

**201 South Jackson Street  
Seattle, WA 98104-3856**

**Log # A-2**



August 16, 2002

Mr. Timothy Stewart  
Planning Director  
City of Shoreline  
17544 Midvale Ave N  
Shoreline, WA 98133

**Re: Comments on the Draft Environmental Assessment and Environmental Impact Statement for the Aurora Avenue North Multi-Modal Corridor Project, N 145<sup>th</sup> to N 165<sup>th</sup>**

Dear Mr. Stewart:

On behalf of King County Metro Transit, I want to offer our support for the City of Shoreline's proposed improvements to Aurora Avenue North between N 145<sup>th</sup> and N 165<sup>th</sup>.

Aurora is an important transit market. The Route 358 is an important regional connection which operates along the length of Aurora through Shoreline and Seattle. This is one of the most productive routes in the Metro system, carrying approximately 7,000 daily riders, 4,000 of which board and de-board in Shoreline. The Route 358 consistently ranks in the top 5 routes in terms of ridership. Currently on Aurora, buses operate every 10 minutes during the peak hours in the peak direction. Off peak service is available every 20 to 30 minutes. Looking to the future, the Aurora corridor is ripe for additional transit service investments. As financial resources become available, it would be our hope that service levels could be enhanced, particularly during the midday and on weekends.

Over the years, King County Metro has worked cooperatively with the City of Shoreline to improve the Aurora corridor for transit operations. The Aurora Village Transit Center, which opened for service in 1983, was renovated and reopened for service in April, 2002. Shoreline was one of our first city partners to install and operate transit signal priority. System testing and acceptance was completed in 2002. Prior to that, bus stops have been consolidated to improve transit flow, and a program to upgrade the remaining stops and add additional lighting is underway. All of these actions have incrementally improved the operating environment for transit, and make it a more attractive mode choice.

The proposed redevelopment project for Aurora - the subject of this environmental review process - is one of the most significant actions the City of Shoreline can take to actively promote increased transit in this corridor. This project is needed to insure that transit will carry more and more of the increased trips that are forecast, and for which general purpose roadway capacity will simply not be available.

King County Metro staff have participated in the alternatives analysis and extensive community review process that has brought us to this point. The City of Shoreline and their elected officials are to be commended for their forward-looking vision for Aurora Avenue North, one that succeeds in striking a balance between local and regional needs.

King County Metro specifically expresses its support for the following elements of the proposed project:

- A-2-1
- Continuous 24-hour business access and transit lanes, consistent with the proposed cross sections in the environmental document;
  - Access management measures to address existing and future safety problems;
  - Sidewalks, pedestrian crossings and pedestrian refuges to create a pedestrian-friendly environment;
  - Continued application of transit signal priority.

A-2-2

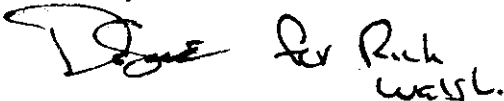
Either of the proposed build alternatives can achieve these four basic objectives. However, we believe that Alternative A will create a more positive pedestrian environment with greater opportunity to provide urban amenities. Consistent with the design principles previously adopted by the Shoreline Council in Council Resolution #156, we believe that during final design, the City should endeavor to minimize business impacts and project costs in those areas where right-of-way is constrained.

We previously demonstrated our support for this project by committing \$500,000 in local County matching funds through interagency agreement. We expect to be able to support this project with additional investments in pedestrian lighting and shelters, as may be agreed upon in the future.

In closing, we urge the city to move forward with final design and construction of the proposed redevelopment project between N. 145<sup>th</sup> and N. 165<sup>th</sup> on Aurora Avenue N. We would further urge you to begin the necessary environmental studies for similar projects from N. 165<sup>th</sup> to the county line. Pending enabling actions by the King County Executive and the King County Council in the future, and budget and appropriation authority permitting, it would be our intent to offer similar levels of financial support to these future projects.

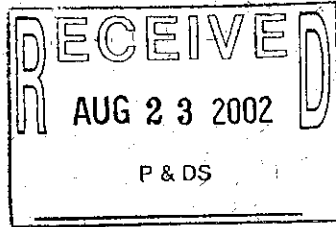
Thank you for the opportunity to provide this input.

Sincerely,



Rick Walsh  
General Manager  
King County Metro Transit





August 20, 2002

Commissioners:  
Bob Chute  
Mike Harrigan  
Ron Ricker

Ms. Joyce Nichols  
Community and Government Relations Manager  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline, WA 98133

District Manager:  
Cynthia L. Driscoll

Sent Via: US Mail

**Subject: Aurora Avenue North Multimodal Corridor Project  
Draft EIS Review Comments**

Dear Ms. Nichols:

We have reviewed the Aurora Avenue North Multimodal Corridor Project ("Project") Draft EIS. This review was performed with respect to possible implications to the future purchase and assumption of the City of Seattle water system within the City of Shoreline by the District.

This Draft EIS is written almost exclusively as a transportation impact analysis without significant review or evaluation of impacts to other public and private infrastructure. There are several brief discussions of other public infrastructure systems such as water, sewer, storm drainage and private systems such as communications, electricity and natural gas pipelines. But these discussions are brief and do not include economic or other impacts to the affected utilities infrastructure.

We offer the following comments, both specific and general from our review:

- This document does discuss a forecast of increased commercial densities and activity as a result of the project. Improved transportation would trigger redevelopment of the existing commercial properties and the improved commercial/retail activities as a result of these corridor improvements, the customer base will be increased. The impact of the increased commercial activities and increased customer impacts on other public and private infrastructure have not been addressed as part of this EIS. Comments relating to impacts are cursory and do not appear to adequately address coordination with other utilities within the project corridor.

A-3-1

- Page 2-14; Construction Staging. The second paragraph discusses relocation of above ground and below ground utilities by placing many of those utilities in a common trench. This statement is not clear in that it does not specify which utilities are to be placed in a common trench. This practice may be in violation of the individual utilities standards for construction and should be clarified. Specifically, the statement should address which utilities are to be placed in a common trench. There should also be discussion somewhere

A-3-2

P.O. Box 55367

1519 N.E. 177th St.

Shoreline, WA 98155

(206) 362-8100

FAX: (206) 361-0629



Commissioners:  
Bob Chute  
Mike Harrigan  
Ron Ricker

District Manager:  
Cynthia L. Driscoll

Ms. Joyce Nichols  
August 20, 2002  
Page 2

A-3-2  
Cont.

in the document on cost impacts, who is responsible to relocate these utilities, and how to resolve competition between all utility providers for space within the right-of-way. One concern regarding the District's specific interests is the possibility of encroachments into the watermain corridor or the undesirable location of the watermain in the final street corridor design.

A-3-3

- There is no detailed discussion of potential impacts to water lines, hydrants and services along the corridor. Widening of the right of way to accommodate a wider street cross section will necessitate relocation of hydrants and water meters to the new edge of the ROW, or beyond, and may also require replacement of service lines. Relocation of driveways to better align the new left turn pockets in the center median may cause existing hydrants, water services and meters to be in an undesirable location within driveways, again requiring new hydrants, service lines and meters. This issue may cause the property owner to relocate the private water service line to connect to the new meter location at their expense.
- The largest watermain on Aurora is a 24-inch steel main constructed in 1933. In addition there are several smaller mains in the existing ROW that were constructed later. These are generally 6-inch and 8-inch mains constructed in the 1930's and 1940's. Due to the age and materials of these watermains, they are most likely in need of replacement in the near future, especially the 24-inch steel watermain. The District is discussing this issue with Seattle as part of the assumption of the Westside water system by the District.

We hope this information helps the City with their environmental impact analysis. Thank you for the opportunity to comment.

Sincerely,

Ronald F. Ricker  
President

cc: Ms. Elizabeth Healy, Transportation and Environmental Engineer, FHWA Washington Division  
Mr. Timothy M. Stewart, AICP, SEPA Responsible Official, City of Shoreline  
Mr. Richard H. Harbert, P.E., RH2 Engineering

P.O. Box 55367

1519 N.E. 177th St.

Shoreline, WA 98155

(206) 362-8100

FAX: (206) 361-0629

324

## Log # A-4

Kirk McKinley

---

From: <earthday1992@juno.com>  
To: <kmckinle@ci.shoreline.wa.us>  
Date: 8/24/2002 1:28 PM

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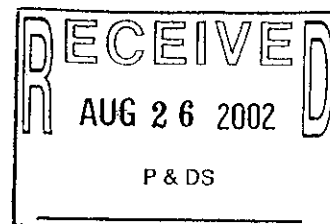
Here's my reasons why I am for the corridor project:

A-4-1  
I saw a vehicle back end another so I see why turn lanes are needed.  
Wide sidewalks make bus stops and business more accessible for wheelchairs.  
When going only 5 blocks along the side of Aurora, cars were parked in my way so I had to go into the lane to get around them. I think sidewalks will solve that problem.

Please pass this on if it's not too late. These are what comments I would've sent in.

Thank you very much!

Sincerely,  
Crystal Kroum



325

**Lanie Curry - Web Site Contact Form**

**Log # A-5**

**From:** <lisakertson@msn.com>  
**To:** <CRTeam@ci.shoreline.wa.us>  
**Date:** 9/4/02 7:24 PM  
**Subject:** Web Site Contact Form

---

A contact form has been submitted from the web site:

Name: lisa kertson  
Phone: 206.362.0540  
E-Mail: lisakertson@msn.com

**Message:**

A-5-1 | My following comments regard the Auora Cooridor Project: 1. PLEASE perform a comprehensive study of the use of Pedestrian Overpasses(using primarily recycled products), rather than (much less safe) crosswalks. 2. I would have attended the most recent public meeting on the project....however, I did not receive the "July" newsletter advising of the August meeting, until five days after the meeting was conducted. Thank You!

326

**Heidi Costello**

**From:** Williamson, Warren J [warren.j.williamson@boeing.com]  
**Sent:** Tuesday, December 03, 2002 7:20 AM  
**To:** City Council  
**Subject:** Aurora Abortion Project

Log # A-6  
**RECEIVED**  
 DEC - 3 2002  
 City Manager's Office

Hello, I remember the first meeting that I went to regarding this project, it was in the spring/summer of 1996 at Shoreline Community College. I have the same problem with the project now that I did then. You are not listening to the people in the community or this project would be dead by now. I bought my house in 1976, where were you in 1976? I have lived in the area since 1967, where were you in 1967? Hiway 99 (aka Aurora Ave North) is a state and federal hiway. Sidewalks do not always need to be on a hiway. The primary purpose of a hiway is to move traffic. The city of shoreline has now moved the priority of the hiway to move pedestrian not vehicle traffic. Your info-mercial shows people in wheel chairs trying to travel on the shoulder and is hosted by a gay dude who can't figure out how to cross the street. I have spent may hours traveling along hiway 99 on foot and on my bike. It's not hard but it does require some common sense and experience around traffic. We don't need sidewalks to get around, wide shoulders are better. They handle disabled cars and foot/bike traffic just fine and are safer that what you propose. Your plan ruins all this.

Taxes in shoreline are terrible. Driving out the businesses as you have done/ are doing reduces the tax base and puts more of the burden on me, the home owner. Don't you get it? As you drive businesses out with your poor planning you also drive out many of us home owners who can no longer justify living here. When I drive around and see poorly planned projects that ruin what we had I feel badly and angry about your learning process. Without experienced people you make mistakes and spend the rest of the time reworking them. The project on 175th near the freeway is just one example. Now we have a light that is required because you moved the street over too far to the north to turn right safely. The planning strip in the middle of the street is the problem. The thing at 155th and aurora is another example. Measure twice before you start making changes. The sidewalks you have put in the neighborhood do not line up and when cars park by the curbs there is only room for one car to travel on the street at one time. This is not safe. It looks like Ballard. Such things could be avoided with qualified people working for the city. Measure twice, cut once. Experience is also important. Just because "that's the way they do it in California." does not mean we have to do it in Shoreline.

A-6-1 | Do you think money grows on trees?!!! We need more capacity for traffic not less. Your plan reduces the amount of traffic that hiway 99 can handle.

A-6-2 | It create a maintenance problem with the planting strip. It creates a safety problem with the planting strip (aka median) because you can't see traffic or pedestrians because of all the crap in the median. People will still cross between the lights and they will be climbing on the median to to do this. In the snow this will be a night mare as people get stuck on the median, think about it!!! We spent millions to straighten out Aurora Ave

and remove the median that existed back in the 60s, don't you know the history of this hiway?!!!

I watch the meetings on cable once in a while and you should too. Look at all the opposition to your ideas. Why don't you listen to them? These are concerned citizens with better things to do than attend you silly meetings. I hate watching the meetings, they are poorly run and by people who are just "playing city". If you continue your poorly conceived plan you will drive many residents out just like the businesses. The health of a city can be seen by the health of it's businesses and how well they city works with them. Shoreline is not as healthy as it was before it became a city. You are responsible for much of that. You will drive the city right into the toilet if you continue and it's your fault not mine.

**Heidi Costello**

Log # A-7

**From:** mark williams [vonwilliams@attbi.com]  
**Sent:** Saturday, December 07, 2002 10:30 AM  
**To:** City Council  
**Subject:** Directions  
Dear City Council  
I follow with great interest your directions for this city.

**RECEIVED**

DEC - 9 2002

City Manager's Office

My thoughts:

A-7-1 | Don't slow down the Aurora traffic! More pavement is not necessarily the answer to a better Aurora Corridor. I'm shocked at the amount of money you are willing to spend on this! For goodness sakes, we are at high unemployment and every penny of taxes really does make a difference. Focus on safety, don't ignore the businesses, and get people thru on the thoroughfare or they'll increase the use of parallel corridors which would really defeat the whole purpose!

A-7-2 |

Gateways project - again, it looks like you have too much money! I notice you don't advertise in the December Currents what amount of money this will cost. Go get donations if you want to do this kind of 'enhancing' our sense of community - but save our tax dollars for true enhancements - like better mass transit so folks will get out of their cars when traveling in-city, or more human services where we need them. And just for further feedback, let's not look like we've been bought out by the big corporations - it is really tacky that the 145th street 'gateway' is totally coordinated with the Walgreen's exterior -

thanks for listening - please focus your efforts on the core issues here!  
Jan Williams  
18028 4th NW  
Shoreline

Log # A-8

**Heidi Costello**

**From:** flyingbear [flyingbear@attbi.com]  
**Sent:** Saturday, December 07, 2002 9:40 PM  
**To:** City Council  
**Subject:** Aurora corridor  
Dear Shoreline City Council,

**RECEIVED**

DEC - 9 2002

City Manager's Office

I am sure you believe you are about to make Shoreline better by your vote for the Aurora project. It is sad to see well intentioned people do grievous harm to our city. I am one citizen who will be ready to take full responsibility for my mistakes should my worst fears prove unfounded. All I want you to consider before voting is that you will also be held responsible for your mistakes. Should the concerns that the Aurora project will create the Seattle traffic disaster, we don't want in our neighborhoods you will have harmed us. I can't believe you want to do that. Economic development is only valid when it is predicated on the quality of life issues that make people want to live here. More traffic, more noise, more traffic injury, more pollution, more cut through traffic, more density more taxes to support the social reengineering of our city will not make people want to live here. In the end folks like yourself will either leave or enclave into gated residences with necessary police protection. The rest of us will suffer all the harms that high traffic, high density and high turnover produce. Why do that to people whose interest you say you represent?

**Bill Bear**



Log # A-9

**Heidi Costello**

**From:** Ken Romdall [k.romdall@worldnet.att.net]  
**Sent:** Sunday, December 08, 2019 9:27 AM  
**To:** City Council  
**Subject:** Aurora Corridor Deisgn  
December 8, 2002

**RECEIVED**

DEC - 9 2002

City Manager's Office

Dear Shoreline City Council:

A-9-1 | This is just a quick note to let you know you have my full support in your decision to delect "Modified Alternative A" for the Aurora corridor design. I am so happy that a decision is soon to be made, after what seems like years of studying, years of meetings, open houses, community workshops, and the seemingly endless controversy and criticisms over the project. You have given the citizens many opportunities to give their input and you have listened, despite what some members of the community believe. Your vision of the future of Shroeline is one that is shared by many of the residents of our community. Thank you for all your hard work, time, energy and thoughts devoted to this very important project that will define our city, set the pattern for future development and greatly improve the quality of life in Shoreline.

Regards,

Barbara Guthrie  
18531 Ashworth Ave N.  
PO Box 7064  
Shoreline WA 98133

Log # A-10

**Heidi Costello****RECEIVED****From:** Towerroc@cs.com

DEC - 9 2002

**Sent:** Sunday, December 08, 2002 6:38 PM**To:** City Council

City Manager's Office

**Subject:** Aurora corridor and the Interurban Trail

A-10 I'm against both projects and want the planning and waste of tax money to stop. I will actively solicit as many voters as I can to Vote against the election of any council member that approves these proposals. When the city of Shoreline was created we were told that taxes would not increase. What a lie. We're paying for new fire stations probably anew city hall in the future and undoubtably a new police station. Why do you think Mr. Eyman has been so successful? I can't afford to live here any more. Either you start listening to the voters or you're out of a job.

shoreline

**Heidi Costello**

Log # A-11

**RECEIVED****From:** Terry Green [hia@cmc.net]**Sent:** Sunday, December 08, 2002 11:26 PM**To:** City Council

City Manager's Office

**Subject:** Aurora

DEC - 9 2002

A-11-1 | It is far too excessive to continue with the Aurora Corridor plan as it stands. No money is free. Medians will not necessarily be any safer as proven by the recent death in the new crosswalk area. It's time to be sensible and trim off the fat.

A-11-2 | - Use 8 foot sidewalks instead of 12

A-11-3 | - Use pedestrian safety islands rather than continuous medians

A-11-4 | - Use low growing vegetation

- Trees if used should not be tall or have heavy foliage that will compromise the infrastructure. Nor should they be allowed to be any closer than 40' apart. (Personally I'd prefer trees that bloom in the spring and can be trimmed annually to prevent overgrowth.)

It's high time to give these sensible solutions the due consideration that they deserve.

Gary & Terry Green

Log # A-12

**Heidi Costello**

**From:** Ginger & Ric Botham [botham@serv.net]  
**Sent:** Monday, December 09, 2002 9:01 AM  
**To:** City Council  
**Subject:** Aurora Corridor project

**RECEIVED**

DEC - 9 2002

City Manager's Office

Dear City Council:

I've participated in the public process of the Aurora Corridor Project many times. One more time I want to restate my concerns.

- A-12-1 | 1. East-West traffic is not improved.
- A-12-2 | 2. Twelve feet of sidewalk and amenity/trees are excessive.
- A-12-3 | 3. The plantings make pedestrian visibility more difficult. This is  
KNOW because I drive the 170th & 165th new pedestrian walkways on Aurora  
every weekday morning. I can no longer clearly see pedestrians. Those two  
test cross walks NEED a red stoplight and not a moving eyes light.
- A-12-4 | 4. Sidewalks need to be shrunk to save existing businesses.
- A-12-5 | 5. Sign ordinances need exceptions for businesses on Aurora during  
the construction phase so that they can tell their customers they are open  
for business in a way that their customers can see the signs.
- A-12-6 | 6. I drove Highway 99 at SeaTac in front of the airport last month,  
missed my left turn (pocket u turn and I turned one lot too soon) so had  
to do a "u" turn across all the lanes of traffic. Luckily it was very  
early and traffic was nonexistent ... but I still needed all the lanes to  
make a very slow and clumsy u-turn. I believe u-turns on Aurora will  
cause many accidents.
7. I've watched Aurora at 95th since 1952 and have seen median  
barriers and barrier divided highway come and go in that location. I  
believe you will put up big medians/barriers and they will create more  
accidents and they will eventually be removed again.
8. You are building what is fashionable in traffic planning, not what  
is good for safety and access for our community.
9. I don't expect anything I say to change you minds. Your minds  
were made up before this process began.

Sincerely,

Ginger Botham  
542-7793  
botham@serv.net  
16334 Linden Avenue North  
Shoreline, WA 98133

**Heldi Costello**

Log # A-13

**From:** Lise Baadh and Gordon Mehus [baadhmehus@seanet.com]**Sent:** Monday, December 09, 2002 12:40 PM**To:** City Council**Subject:** Aurora Project Approval

Shoreline Council Members:

**RECEIVED**

DEC - 9 2002

City Manager's Office

A-13-1 | As a taxpayer and Shoreline resident, I ask that you approve the most aggressive reworking of the Aurora corridor now on the table. Aurora represents the worst of the 1960's "non-planning" era. With new approaches and medians, safety and access are improved. With new plantings, aesthetic improvements and wider sidewalks, the area will have an appeal to Shoreline *and* nearby residents that most certainly does not exist now. I think we can do better than "be like Lynnwood".

I believe that the most vocal of retailers, who seem to believe they own Aurora, are afraid that improvements above and beyond a few turning lanes will attract attention and new businesses to the area. New and more vibrant business activity will force the existing retailers to make capital improvements that haven't been required (beyond a coat of paint) in 40 years! Take a cold, hard look at Aurora and you see many retailers that probably no longer belong on a major corridor. There are a number of local malls that have vacancies that could be filled. Create an attractive and traffic friendly retail corridor out of Aurora, and it will thrive.

I urge you to take a bold move and move ahead with your plans. Just because the opposition in the business community get the most press, do not underestimate the support you have in the community. Everyone I talk with hopes the improvements are made and looks forward to the day when it's a pleasure and not a nightmare to shop the Aurora corridor.

Sincerely,  
Gordon Mehus  
Shoreline Resident

PS. My wife and I both appreciate the "Shoreline Currents" and other efforts by the City of Shoreline to keep residents informed. Good work!

Log #A-14

**Heidi Costello****From:** Info - thePRIME. [info@theprime.com]**Sent:** Wednesday, December 04, 2002 2:33 PM**To:** City Council**Subject:** Aurora Project**RECEIVED**

DEC - 9 2002

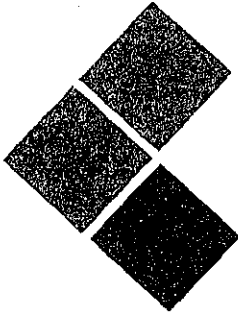
City Manager's Office

I just wanted to voice my opinion about the Aurora Project.

A-14-1 I have read some information about the project and think expanding Aurora and putting gin side walk not only hurts the local business's but is un-necessary. The funding for this project could be better spend elsewhere. Lets clean the city up, put up more signs, more awareness for the community regarding pedestrians and we'll be on the right track.  
The only way I can see this work is if there is a compromise for the business's that are standing that this project would be disrupting.

Thank you for listening. Hope this helps.

doug waun  
19920.5 aurora ave.  
thePRIME.  
888.PRIME.57

**COTTINGHAM TRANSPORTATION ENGINEERING**

350 N.W. 175TH ST. - SEATTLE, WA 98177 - PHONE 206-546-3030  
P.O. BOX 7370 - SEATTLE, WA 98133 - FAX 206-546-5203

Log # A-15

December 20, 2002

**FILED**

DEC 20 2002

CITY CLERK  
CITY OF SHORELINE

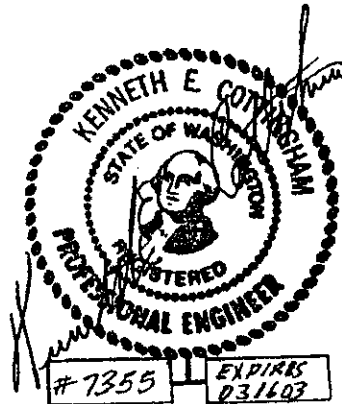
4:00 PM

Timothy M. Stewart, AICP  
SEPA Responsible Official  
City of Shoreline  
17544 Midvale Avenue North  
Shoreline WA 98133  
(206) 546-1508

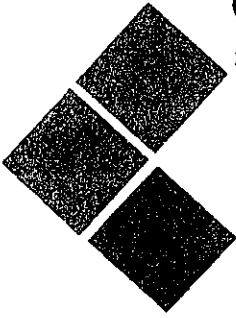
The following 13 pages of comment, correction and notice of omission to the Final Environmental Impact Statement as related to the Aurora Corridor Project, N. 145 Street to N. 165 Street are hereby submitted on December 20, 2002 to the City of Shoreline.

KEC:dbc

Enclosures



*Kenneth E. Cottingham*  
Kenneth E. Cottingham, P.E.  
Transportation Engineer.

**COTTINGHAM TRANSPORTATION ENGINEERING**

350 N.W. 175TH ST. - SEATTLE, WA 98177 - PHONE 206-546-3030  
P.O. Box 7370 - SEATTLE, WA 98133 - FAX 206-546-5203

AURORA AVENUE NORTH 145 St. to NORTH 165 St.  
FINAL ENVIRONMENTAL IMPACT STATEMENT — FEIS

RESPONSE TO NOVEMBER 27, 2002-DEIS

FINAL DATE DECEMBER 20, 2002 - FOR COMMENTS

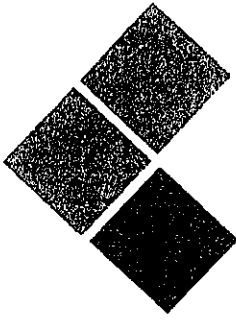
COMMENT T-30 (Page 13 of Court Reporter's August 6, 2002 Testimony)

A-15-1  
T-35 with response #64 Alternative C. The rejection of the Alternate C indicates that no consideration would be given, and as categorized as "alternative examined but rejected". This is a Alternate C reasonable proposal and one that was given no response. However, the City has adopted an alternate not contained in the draft EIS, labeled "Alternative A-Modified". We see little difference between consideration of the latter and not the former. A reasonable cross-section that would stay within the right-of-way for the greater section of the roadway of 100' wide, and retaining the two-way left-turn lane has not been included in the alternative, although the authors had received this in a timely manner and presented a feasible alternative that met goals and objectives of the project.

A-15-2  
Response ID #50, required medians, there is erroneous reference to WAC-468-52-040 that a restrictive median is "required", whereas the reading of WAC-468 indicates that the "roadway typically distinguished by existing or planned non-restrictive median". WSDOT has continuously indicated a different interpretation of WAC-468 and has stated in public meetings that the raised median is required under the law. This is a misrepresentation of the WAC and has put the merchants on the defensive on Aurora Avenue on an issue that has been misrepresented throughout the five years of the presentations by WSDOT. The City going along with this misrepresentation has also said they cannot do what WSDOT will not approve, and indicated erroneously that a raised median would be "required" to obtain project design approval.

A-15-3  
Continuing, the accident rate has been misrepresented for that section of Aurora from 145th to 165th, and comparing it to arterials throughout the State including Eastern Washington, said roadways that have lower traffic, lower number of lanes, and not compatible nor comparable to Aurora Avenue. Actually the accident rate on Aurora Avenue within the City of Shoreline is decreasing over the last two years, and it is misrepresented by both the City and the State that the accident rate is increasing. A simple look at the collision diagrams prepared late in the DEIS process, shows that simple signing and pavement markings would, more likely than not, reduce the accidents between 145th and 155th by one-half of what has existed in the past. With no channelization changes, no lighting changes, no widening, no sidewalks, this reduction can be done and will change the accident picture from what we have seen in the last two years. Nothing has been done to



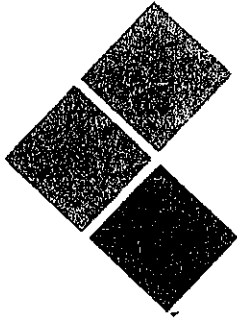


A-15-3  
CONT. reduce the accidents in this five year period, much less the last two year period, and conflicts continue to occur at mid-block locations as well as intersections that could be eliminated by simple traffic control devices without any paving whatsoever. Such a solution has not been studied or recommended to improve safety and increase capacity.

A-15-4 The State implies that WSDOT Design Manual Chapter 910, Page 910-7, indicates that in the urban setting, no more than two thru lanes in each direction for two-way left-turn lanes. That would be as the author suggests, because left turning across three lanes could be accident potential. However, without saying that, or agreeing to that, we go to the proposed alternate that shows many new added left-turn lanes in the area of 145th to 155th, unsignalized, that will be doing exactly what the State wants to eliminate, namely left-turning across the thru lanes.

A-15-5 However, there may be some value in this analysis since three thru lanes really will not exist if one of the lanes is a BAT lane which could be considered as a non-thru lane. Reasoning by WSDOT and the City that left turning at unsignalized intersections across two thru lanes cannot be done safely in a two-way left-turn lane, but can be done safely in a dedicated or focused left-turn lane, does not hold water. Obviously the subject matter cannot be clearly identified without detailed left-turn studies, studies of which none are shown. The reference to the section within the City of Seattle that shows buses striking left-turning vehicles in the northbound transit lane, cannot be alleged as to apply to the City of Shoreline, and would be erroneous to do so.

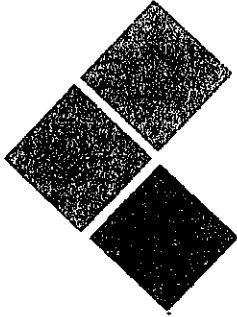
Obviously Highway Standards by WSDOT do not accurately reflect nor should they apply to urban studies since those standards have little or no application to Aurora Avenue in this area, and no background of accident statistics to identify problem areas.



Response ID #49, Increased capacity with the signal. The terminology used indicates that all traffic signals would be interconnected and have a coordinated operation, is only saying so without showing that it can be done. Coordinated signal operation is presently on Aurora with interconnection. Even bus priority is under installation and unknown to the writer. Additional signals that are proposed to allow safe access into Aurora are at North 152nd and North 165th Street, plus the existing signals stay as is. The comment that the warrant analysis has been met and is in accordance with WAC-468 cannot be substantiated since the signals are inconsistent with WAC-468 for signal spacing. Saying so, doesn't make it so. This goes for the coordination and compliance with the WAC.

A-15'6  
A coordinated signal system requires a detailed manual and/or computer analysis to determine if interconnect and coordination will work with intersection spacing to "prove-out" and provide the "green-band" progression. It is a complicated calculation that can be done manually or by computer, but nothing has been done that shows the "green-band" can be achieved. Obviously, spacing at intersections makes a big difference as well as signal cycling and phasing. Traffic volumes in one direction can be coordinated, but not always in both directions as quite often is the case on Aurora when peak volumes in each direction require a signal "green". Nothing has been done to show how or if that would work, how the east/west traffic would be affected and how the actuated signals within the system would operate while still holding to a platooning of "green-band" coordinated progression on Aurora. Attempting at coordinating a group of signals to improve the traffic flow, and capacity, of the roadway section is a true statement, but more likely than not, cannot be done on Aurora; and nothing has been done to show how these calculations would be made to show such a system. Adding traffic signals to the existing signal locations make coordination even more difficult; nothing has been done to show how this will be done, only that it will be done, without any supporting data to show if it can be done.

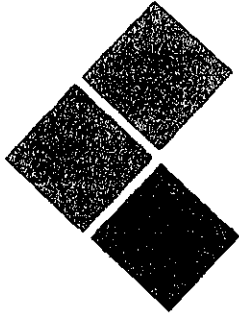
The capacity of Aurora cannot be stated as 'improved', if it is impossible to coordinate the signals into a workable system that has specific timing and offsets for each intersection. Capacity of an intersection is dependant on signal timing and nothing has been done to show that increased capacity can be achieved.



A-157 Response ID #47, How is Capacity Improved. The preliminary discussion in this item is that BAT lanes will provide additional right-turn capacity at street intersections. We do not disagree with this comment, however, a BAT lane thru the whole project is not required to get the same capacity improvement. Simply adding right-turn lanes at signalized intersections does the identical capacity improvement, allows all traffic to use the right-turn lane which is an additional lane to the two thru lanes, and based on capacity calculations, would do the same at the BAT lane. It would also provide buses a chance to do what they would rather do, namely stop in the thru lane rather than stop in a pull-off lane. Stopping in a pull-off lane requires waiting for the bus driver to pull back into the lane of traffic, which eats up more time than an actual bus pull-off lane. Metro has repeatedly indicated that they would rather see stopping in a thru lane for their capacity, even though it does reduce the capacity of the vehicles behind them. This writer prefers pull-out lanes for buses to improve capacity and safety, (no rear-end collisions behind buses).

The coordination of project traffic signals in response #47 is a good objective, but nothing has been shown that progression and/or coordination can actually be done. The platoon discussion of a planned optimal speed is a good idea, but saying so, doesn't make it so. The irregular distances between signals will disrupt the traffic platoons as stated and upset the efficient traffic flow. Addition of a traffic signal at North 152nd is such an irregular distance when comparing to 145th and 155th. The addition of a traffic signla at North 165th is a more regular distance, namely one quarter mile, 1320' from North 160th. Nowever, the usefulness of the signal at North 165th which feeds a residential area to the west and nearly a dead end to the east, makes the analysis questionable and not addressed properly.

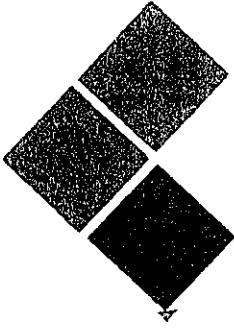
A-158 Simple traffic engineering improvements to prevent thru traffic on North 165th street at Aurora, and provide right turning only from east and west leg, and prevent east and west traffic, would take away all of the problems associated with the accident experience at this intersection, which is minimal. The collision diagram prepared late in the EIS project, indicates very little accident problem area at North 165th, and most recently, a pedestrian demonstration crossing program has been instigated, turned on in December, 2002, and more probably eliminates the need for signalization at this street of North 165th Street intersection at Aurora Avenue.



A-159 There presently is no plan in Metro to increase service on Aurora Avenue which now has Route 358 of Metro running the full length of Aurora to Downtown Seattle from North 200th Park & Ride. We find it difficult to understand that ten to fifteen percent of trips in the corridor during the peak-hour in the peak direction is carried by transit when only one bus line #358 runs on Aurora, thru Shoreline. Another line is contemplating leaving Aurora at North 185th that now uses North 175th Street. Therefore, thru the corridor of 145th to 165th there will be only one Metro line #358 serving Peak and off-peak traffic. With no new service anticipated in the future, and with a cut-back of services coming in January or February of 2003, it is unlikely that there will be any more transit services on Aurora Avenue. The BAT lanes are very inefficient to buses. It is very questionable if the BAT lanes will ever be useful in Metro Transit based on present day, December, 2002, operation. The spacing of buses on Route #358 at 20 MPH speed and 6 min. best spacing is 2 miles between buses for the peak-hour of buses in the BAT lane.

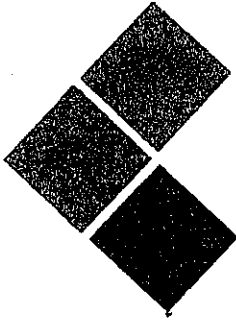
A-1510 Providing a green phase as soon as possible once the bus reaches the intersection is a desirable feature, except that it is already under installation. Transit signal priority is nothing new and is being initiated now in the year 2002 by Metro in cooperation with the traffic signal maintenance and including installation of equipment for detection of approaching buses. The FDEIS should not include this as a project that will be done in the Aurora Corridor with this present project since it is a separate project funded by others and not a part of the Aurora Corridor project.

A-1511 Response ID #51, Include Two-Way Left-Turn Lane. Rejection of other alternatives without discussion by saying "would not meet project purpose and need", is not correct interpretation of what should have been done, but is correct of what was done. To indicate projects would not be approved by WSDOT, fails when in fact, the error made in reviewing WSDOT Standards and WAC-468 is pointed out elsewhere. The two-way left-turn lanes can be left as is and the side streets and/or driveways can have traffic control devices installed to prevent some of the conflicting movements that are now accident prone. Nothing has been done to show this easy to obtain alternate and in fact, no analysis of accidents involving turning movements was made until late in the final DEIS showing the last years of 1999 and 2000 collision diagrams. Traffic safety, pedestrian safety and traffic capacity can be improved and still maintain a two-way left-turn lane, because the two-way left-turn lane can be utilized with pedestrian islands for safe east/west crossing. By lowering the number of left turning vehicles at signalized intersections will improve capacity on Aurora, capacity on the east/west streets, and eliminate the U-turning concept proposed in the FDEIS. This combination of common place, simple traffic engineering improvements has not been considered, but has been rejected.



A-1512  
Response ID #52. The CATF recommendation included some 32 points of which one of the points was "reduce the speed limit to 35 MPH". This is not included in the Response #52 and is an important one because of the lowering of collision forces from 40 to 35 MPH, results in a 44 percent reduction in the collision forces to a pedestrian or a vehicle. Forces on a person and vehicles including occupants are related to the squaring of the velocity and therefore a 5 MPH reduction results in almost one-half of the force on vehicle occupants and pedestrians. Clearly this is a great safety improvement by the lowering of 5 MPH, will fit with the WAC-468, and is recommended in the 32 points of CATF. Clearly Response #52 does not address to the 32 points correctly in the CATF recommendation, and the FEIS fails to adequately address this important item.

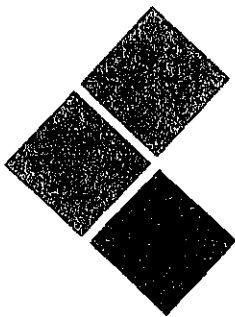
A-1513  
Response ID #56, Left-Turn versus U-Turn Safety. It is stated that the primary purpose of the median is to provide a safe refuge area along the center of the roadway for vehicles to make left-turns and U-turns and for pedestrians crossing the roadway. This statement is taken verbatim from Response #56. In order to make the U-turn or the left-turn in midblock, a vehicle will have to cross over the two thru lanes as well as the BAT lane and in some cases, into the 4' amenity zone to make the U-turn. Clearly this is considered in the FEIS as safe, whereas the two-way left-turn lane doing the same thing is considered unsafe. We find this a contradiction in analyzing the safety, not commensurate with actual traffic operations to identify it as a safer turning movement, and has no backup of statistics anywhere for support. It does not take many minutes of calculations to find out that a two-way left-turn lane provides an opportunity to reach the opposite side of the street or make a U-turn at a non-signalized intersection. Prohibiting that movement and forcing drivers to make a U-turn at a signalized intersection increases the left-turn volume which, when detectorized, increases the signal time for left and U-turning, takes away capacity north/south and east/west, and interferes with right turn on red from the side streets. This latter interference will produce accidents or delays or both, by putting U-turns into signalized intersections where they are not commonly found now under the two-way lane left-turn concept. Clearly accidents will go up, capacity will go down, and the proposed elimination of the two-way left-turn lanes will have a lowering of capacity and safety on Aurora Avenue, no other analysis would show different. TWLTL has the unmistakable feature of removing turning movements from signalized intersections and in doing so, drivers can turn during the gaps provided by signals, making the signalized intersection more efficient. The FEIS fails to consider the advantages of TWLTL, but continues to address to raised medians.



A-15-14  
Response ID #59, U-Turns for Trucks. Present operations along Aurora show that deliveries to businesses will use the smallest vehicles up to the largest articulated vehicles. Auto business along Aurora is, and will be, a continuing delivery and pick-up business. The vehicles are multi-deck and multi-length up to the largest wheelbases. Many of these loadings and unloadings are done from the center median which is common throughout the State and accepted by enforcement agencies. Elimination of this two-way left-turn lane eliminates that very type of loading and unloading. The articulated vehicles in particular, need to have an "in" and an "out", and a turn around area that presently does not exist for most of the car industry along Aurora Avenue. Only a very few have access to a thru "in and out" route, and those that do not, have very little chance to construct under the "build-up" situation on Aurora. Large vehicles will be turning, left-turning to residential areas because it allows a longer radius of turn, and little can be done to stop this type of maneuver unless putting businesses out of business is the objective. The raised median will place truck traffic onto Linden and Fremont wherever the east/west streets connect. This diversion of traffic has not been considered in the FEIS.

Response ID #60, Emergency Vehicles. Provided trees are eliminated from the planted medians, the fire and police departments will have little problem driving over the center medians to reach the opposite side. The curbing should be "mountable curb" to assist. I am sure that in the process of analyzing response time, this was their analysis, since the curbs will not be high enough such as a Jersey Barrier would have been, to prevent such maneuvers over the planted medians.

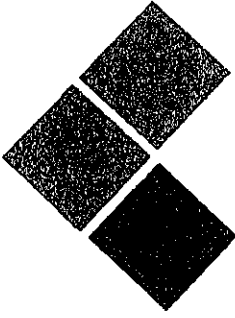
A-15-15  
The present two-way left-turn lane is an improvement over a raised median both for fire trucks and police vehicle. It allows emergency vehicles to go in the wrong direction thru signalized intersections because there is no planted or raised median in advance of the intersection far enough to cause a problem. This is how they presently operate. However, there is no question in this author's mind that the raised median will increase response time to both fire and police vehicles, and it is only common sense in watching present operations all along Aurora Avenue to see how response is made utilizing the present two-way left-turn lanes. A raised median will definitely increase response time by fire and police, and in discussions with personnel, it has been revealed that the drivers will simply drive over the raised medians if need be.



Response ID #64, Alternative C. This writer proposed Alternative C and many others thought this was a better solution in that it fit within the right-of-way. The response in #64 is "no Alternatice C has been included in the Final EIS". The alternative was rejected and with very little explanation as to why rejection. Alternative C can be built within the right-of-way, can be built using up to date standards for vehicle and pedestrian movement, improves pedestrian crossings, and retains the two-way left-turn lanes which were originally built in the mid-seventies by WSDOT when the center curbing was taken out.

A-15-16 The reasons for the two-way left-turn lanes was to improve capacity and safety and access to adjoining and abutting ownerships. This was prior to the time of incorporation of the City of Shoreline. It was an entirely WSDOT and King County project that put in a coordinated signal system, used raised channelization where required at intersections, and provided the maximum of capacity on Aurora. In order to provide the "ultimate" capacity, some right-turn lanes could have, or should have been constructed, but right-of-way was not available and therefore the extra approach to each signalized intersection was not constructed. Probably that one item alone would allow increased capacity and truly would be an alternate that would surpass the Alternate A and B, and A-modified, for capacity. However, consideration is not done and only rejection is made of Alternate C.

The DEIS was done showing capacity in terms of LOS or level of service. The analysis erroneously utilized side street capacity restrictions as if they were restrictions on Aurora Avenue, therefore indicating capacity problems that would be solved by a new Aurora Avenue. That analysis has continued into the Final DEIS. The Highway Capacity Manual clearly indicates how capacity shall be considered and as adopted by WSDOT as the Transportation Research Board Publication for analysis of capacity. Specific calculations need to be done to show that the signalized intersection will indeed have increased capacity and based on a signal system that recognizes east/west, north/south, left-turn, and U-turns. This has not been done and therefore no statement can be made that this project will increase capacity when said capacity calculations have not been provided.

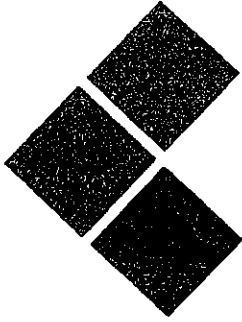


A-1517  
Response ID #69, Left-Turns in the Median. This comment recognizes that an acceptable amount of left-turn and U-turn breaks in the median will be approved by WSDOT. However, WSDOT if applying their own design manual and WAC-468, will find that additional turning that are put into Alternative A-Modified, will not meet the standards and will require exceptions and deviations, making it very similar to the two-way left-turn proposal. Once again, turns of the left and the U-turn variety will be crossing over three lanes of traffic at non-signalized intersections which is contrary to the above documents. We do not see how safety can be compromised by comparing the two plans when in fact, they result in the exact same conflict of turning traffic.

A-1518  
Response ID #73, Study Area and Pedestrian Safety. Neighborhood traffic has been a continual problem both in the draft and now the final EIS. Erroneous interpretation of the traffic signal impact of North 165th at Aurora is evident. Shoreline Community College students will find that in order to avoid the congested intersection of Greenwood at North 160th, they can go north on Greenwood and enter Aurora thru the signal at North 165th Street. This clearly will be a change in neighborhood traffic, has not been conveyed to the abutting owners as such, and will increase traffic volumes thru residential areas. The last paragraph in response #73 indicates that there will "not be a noticeable change in traffic on neighborhood streets due to this project". This is not so and no analysis has been made commensurate with the above paragraph.

Neighborhood traffic will be changed, the attraction of signalization to make all movements at 165th and Aurora will attract bypass traffic and other thru traffic to 165th, and with the Shoreline Community College having the greatest advantage to make that traffic diversion. With no sidewalks or turning lanes on North 165th between Aurora and Greenwood, development of additional traffic with Shorewood High School pedestrians crossing north/south, should be considered, analyzed, and presented as one reason for not signalizing North 165th Street. - An alternate of prohibiting turning and thru movements at North 165th was not done.



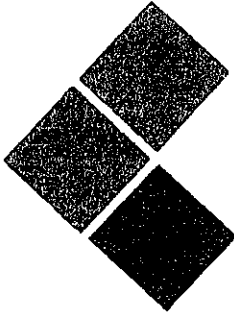
**COTTINGHAM TRANSPORTATION ENGINEERING**

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A-15-19  
Response ID #75, Value Engineering. One of the important items in the Value Engineering Study was to reduce the speed limit to 35 MPH. The response in the FEIS does not indicate thus, and it is still a viable goal in that the CATF also recommended 35 MPH. Other analysis and comments by this author have indicated the lowering of severity of crash for pedestrians, occupants and vehicles by lowering from 40 MPH to 35 MPH. The City has not instigated a request to lower the speed limit to 35 MPH. Previous studies have been done, but not presented in the draft EIS having to do with traffic volumes as measured along with their speeds when the speed limit was lowered from 45 MPH to 40 MPH. Very little consideration has been given to the request by many reviewers of the draft EIS, and the response is nil. The writer recommended consideration of lowering the speed limit to 35 MPH and nothing has been studied in support of keeping the 40 MPH limit nor a 35 MPH speed.

Response ID #76, Federal Grant Requirements. The third paragraph in this response indicates that "WSDOT would likely require less turn-outs at bus zones" if car pools were allowed in the outside BATlane. Then, during the time of the final EIS, a bus turnout was removed by WSDOT in the southbound lane at North 165th Street on Aurora Avenue at the Arden Nursing Home. This change has now resulted in the bus stopping in the thru lane at the bus shelter for passengers. WSDOT verbally indicated that very few persons used this bus stop, but this is not so. Certainly the workers that come at all hours use the bus stop, and it is very rare that the bus goes by without dropping off or picking up someone, and this occurs in the peak and off-peak hours, both day and night. This removal of the bus turnout lane was done without any public notice and for an experimental pedestrian crossing, and contrary to the above WSDOT bus zone statement.

A-15-20  
The pedestrian crossing at North 165th Street is now situated in such a way that it is neither a marked crosswalk nor an unmarked crosswalk, as defined by State Law. These two changes within the past 90 days of traffic have not been indicated in the final DEIS and in fact, quite the contrary, a photograph showing the bus turn out lane in Volume 1 of 2, Figure 3-8, the lower picture, a photograph looking south on Aurora prior to the removal of the bus turn out lane, which is between the white and the yellow curbing.



A-15-20  
CONT.

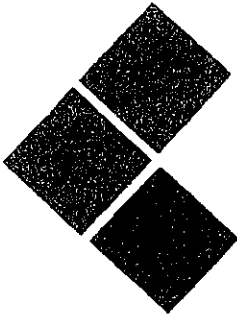
Clearly there is no coordination on traffic control between the City, the State, and the public on Aurora Avenue. This elimination of the bus turn out lane is causing peak-hour stoppage of ten to sixteen vehicles in the peak-hour every time the bus stops at the curb due to the deleted bus pull out lane. This type of traffic control analysis is inherent in the FEIS, and represents why the merchants along Aurora do not believe there will be improvement to traffic capacity and safety. The merchants truly want more driver and pedestrian safety, more crossings, higher capacity, and less backup. But this project has not demonstrated that such will be the case.

A-15-21

Response ID #77, Safety and Capacity. The first paragraph, and only paragraph, indicated that a raised median must be built with focused left-turns and according to WSDOT the project would require a median separator. The requirement is only in the minds of the engineers who have reviewed the project and not substantiated or supported by design requirements. [Once again, WAC-468 has been set aside since Aurora is a Class 4 highway and can be built with traversable medians as well as non-traversable medians.] Meetings and discussions with WSDOT have indicated their refusal to consider traversable medians, the same medians that are presently in operation all along Highway 99 from Seattle to Everett, and traversable medians that are presently under construction north of Shoreline to Everett. These two-way left-turn lanes are proving to be attractive, aesthetically pleasing, provide conflict free travel and higher capacity.

A-15-22

Response ID #80, East/West Traffic. The first paragraph indicates that all three action alternatives include additional traffic capacity on east/west streets at approaches to intersections with Aurora. No supporting documentation is given to show the east/west capacity increase. Simply increasing east/west "green" time on the traffic signals will increase capacity, but at the expense of Aurora Avenue "green" time and the turning traffic. As mentioned in other responses by this author, a complete capacity analysis has to be made assuming certain traffic signal timing, traffic volumes involved in turning, U-turning and left-turning, pedestrian volumes, and to show that the increased capacity has been achieved or will be achieved. Nothing has been shown in the draft or the final EIS to support the contention that traffic capacity will be increased. Additionally, the term "dramatically improved at 3 out of 5 intersections with the project limits", indicates that even more than nominal increase in safety or capacity will be included, but once again, without supporting documents.



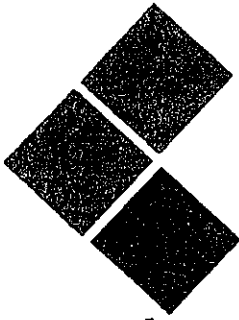
A-15-72  
CONT.

Additional east/west capacity needs to be constructed in this Aurora Corridor project, but nothing shows how or where this will be done. Added lanes must be included in the project at major intersection, signal timing must not increase for east/west traffic since it will lower Aurora capacity to do so. The BAT lane will not increase capacity over a separate right-turn lane on Aurora. The very purpose of increasing capacity on Aurora will not be met without increasing "green" time on Aurora and increasing east/west number of lanes for an overall increase in capacity on both Aurora and east/west arterials. However, this is not what the project is set out to do in the FEIS and not addressed in the FEIS.

A-15-23

Response ID #85. The second paragraph of this response indicates in convoluted wording that Class 3 may apply to Aurora, but also admits that Class 4 does apply to Aurora when reviewing WAC-468-52-040. Raised medians are not required by WAC-468, but the reading is not clear and tends to confuse the reader by speaking of length of two-way left-turn lanes, etc., etc., etc. As WSDOT clearly knows, a request by the City has not been made to retain the two-way left-turn lane which is normally how exceptions and deviations are handled by WSDOT. With no impetus by the City to either preserve two-way left-turn lanes, or to lower the speed limit, WSDOT has little to do but to sit back and say "NO." The mere inclusion of focused left-turn lanes between 145th and 165th at non-signalized intersections is clearly the exact movement made by a two-way left-turn lane that will be crossing over three lanes of traffic, if in fact that BAT lane is considered as a thru lane. The Aurora merchants have not been considered in their requests to make Aurora safer and more traffic within the design standards of all agencies and retaining the desirable features of the present roadway configuration. The FEIS has not adequately addressed the present operational problem areas in a manner consistent with known remedies as contained in the Manual on Uniform Traffic Control Devices Millennium Edition (2001 MUTCD) as published and approved by the U.S. Department of Transportation under Title 23 USCode.

Section 4B.04 "Alternatives to Traffic Control Signals" contained in the 2001 MUTCD outlines alternates to signal installation even when the warrants for installation are met. Under this section, are alternates A thru L that could be considered as alternates to signalization of North 165th Street and North 152nd Street, when an engineering study is made. The FEIS does not indicate any alternates were considered at either intersection and is therefore incomplete.



Response ID #86, Speed Limit. Lowering the speed limit to 35 MPH is a definite assist to merchants, pedestrians, and reducing accidents and accident severity. Even capacity may be improved by the lowered speed. However, the State has indicated that after the project is completed, they would make a review of reducing the speed limit, which may be more than ten years in the future. This is certainly not acceptable nor is it consistent with the CATF recommendations. It is stated that the City of Shoreline supports the reduction of the posted speed limit on Aurora. However, no document supports the City request to lower the speed limit to 35 MPH.

A-15-24  
As a Class 4 designation under the WAC-468, all requirements would be met with the 35 MPH speed limit and with the inclusion of a traversable median, meaning retaining the two-way left-turn lanes. The first paragraph of ID #86, indicates that the City may request WSDOT conduct an evaluation to determine if whether the reduction of the posted speed limit is appropriate. Obviously this working means that such a request has not been forwarded by the City. Such a speed limit reduction now, before construction, would have a decidedly improved safety impact rather than waiting 10 years and the FEIS only confuses the issue.

The speed limit to be based on a vehicular speed of the 85 percentile speed, is in conflict with urban growth and has recently been rejected by the State of California as not representative of a proper speed assessment barrier. We wish to one more time, request as the CATF had requested, and as the City now indicates they should request, that a 35 MPH speed limit study be done and that the 35 MPH speed be installed. As WSDOT well knows, that even the results of an 85 percentile speed study, under the law and the policies and procedures, a 5 MPH below that point can be done, which the State is presently using in many areas of the State.

A-15-25  
Response ID #145, Signal Spacing. The proposed signal spacing does not meet WAC-468-52-040 which requires certain spacing and traffic engineering analysis signed and sealed by a qualified professional engineer. The spacing shall "ensure adequate signal progression". Nothing has been presented in the FEIS to support the inclusion of Class 4, in WAC-468-52-040 as to signal progression certification.

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

From: unclemy@msn.com

Sent: Wednesday, April 23, 2003 5:05 PM

To: Mathis, Daniel; CarePlus@cmc.net; cbelster@earthlink.net;

Chase\_Ma@leg.wa.gov; Higharena@aol.com; jacnkatie@msn.com;

JohnChangShoreline@hotmail.com; kencott@webtv.net;

Larrywmgoldies@aol.com; mfimia@zipcon.com; Sales@exoticmeats.com

Cc: MyronP6464@aol.com

Subject: Central Shoreline Subarea Plan or is it Phase II of the Aurora Corridor Project?

Dear Mr. Mathis:

My name is Myron Phillips and I am vice-president of a group called The Shoreline Merchants Association. We are located in the City of Shoreline. I believe you have been talking to our attorney, Roberta Farris regarding the Aurora Corridor Plan(SR99) here in Shoreline.

As Roberta has already told you, the city has approved Phase I of this project from 145th-165th which is the southernmost section of the three mile project. As businesses on Aurora, we have issues with the width of the highway, the width of the sidewalks and the restrictive, raised median. We feel it is harmful towards our businesses and that a proper study was not done. Neither were businesses properly notified or heard. Also, we have a dense population of Asian and other ethnic businesses which believe their Title VI rights may have been overlooked.

A-16-1 Phase II and III constitute the two miles North of Phase I. I am sure Roberta will fill you in on our appeal of Phase I as it goes through the court system. We would ask for your further assistance and guidance for another project that the city wants to start in the middle section of Aurora(SR99). They call this the Central Shoreline Subarea Plan. This, essentially is Phase II, of the Aurora Corridor Plan.

The city has applied through the Washington State Ecology Department for further development of this project. Eventually, they want to make the central area of Aurora their downtown.

They have defined the right-of-way for Aurora in this plan. If it is approved, we feel that they have defined Phase II of the Aurora Corridor Project which has not been approved by your office, nor has there been funding approved from any source. Environmentally, nothing has been done or approved by FHWA. In short, this is "over-laying" one proposed project upon another.

We feel that since Federal Highway Trust Fund dollars have been expended to our city for preliminary design and some ecology

issues, that your guidance and approval is needed for the completion of the Aurora Corridor Project. The question I have for you is, can they go ahead with this Sub-Area plan prior to the approval of Phase II of the Aurora Corridor Plan?

A-147  
Cont'd. Lastly, numerous businesses will be displaced permanently! I asked the head of this project, Mr. Tim Stewart, if these businesses had been notified, if consideration had been given to relocation or even reimbursement for their losses, and he said that he didn't think so! I am, quite frankly, appalled at how the City of Shoreline has treated our respected business community. Our businesses on Aurora contribute greatly to the financial infrastructure of our city. We need your help! The entire corridor project, according to the NEPA Act, should have been considered as the entire project. That is, a NEPA environmental study should have been conducted on the entire project "up front". Then, if so desired, they could segment the construction into Phase I, Phase II, etc.

We would appreciate a response from your department. The latest document, for the subarea plan, has been filed with the Washington Department of Ecology. It's number is: #200302109. The document type is: DNS(Determination of No Significance)

There is a hearing with our city planning office on May 15th. It would be placed on the docket for the Shoreline City Council approval in June. Thank you so much for reading my e-mail. You can call me at my office(206)546-2426 or at my home(425)774-5707.

Myron G. Phillips, DVM(Shoreline Merchants Association)

A-17-1

63-1 Response ID: 24 is not answered in the City's response. Response ID: 24 actually makes the point as to why if what the City maintains is true why all of the available funds should be used for a "frill-less" 3 mile project. The City also states in their response that one of the objectives is "cleaning up the clutter". Since when are part of a Federal Highway project's goals set out to be urban renewal?

63-2 Response ID: 161 this question is not answered in Chapter 3 of the EIS. Title 23 section 109 requires the City to fully consider economic, social, and environmental effects of the projects. Yet the City fails in Chapter 3 to even provide simple statistics such as what is the number of employees employed in the affected area's businesses? How many of these businesses are minority owned? Many different statistical reports are cited in the EIS from studies done in other areas yet none are offered in regards to the adverse impact on small business with such a project as this. What is the City's estimate on how many jobs will be lost? The only reference is on page 3-59 paragraph 2 where the EIS states "Small businesses and businesses that depend on location or drive-by customers are most likely affected". Is this what the City would classify as being "fully considered"?

63-4 Response ID: 234 the City's response makes little sense for two reasons. First bicycle travel on sidewalks with pedestrians is very dangerous for both. People who commute by bicycle need dedicated lanes for this purpose. Portland Oregon has some 285 miles of dedicated bicycle lanes-today. Secondly the last part of Response ID: 234 addresses the fact that such lanes would "increase the construction and right-of-way acquisition const, increase environmental impacts, and cause significant impacts on property/business owners". This is a curious remark because all along the City tries to downplay the impact of this project on business. How can 4 feet of amenity zone be so insignificant to businesses, yet 4 feet of bicycle lane would bear significant impacts? ID: 234 speaks of Capital Improvement Projects for bicycle lanes as called for in the Comprehensive Plan, yet CIP funds are routinely budgeted for such projects but then the funds are then diverted into projects such as this and billed to the public as "free".

63-5 Response ID 236 the question is completely evaded by answer. Page xxiii of the DEIS in paragraph 3 states in referring to the 165<sup>th</sup> to 205<sup>th</sup> "only a limited amount of project funding is available at this time, and there is no certainty regarding if or when additional funding will become available". This being the case there is enough money to build a 7 lane road with 6 foot sidewalks with the funds available today. On one hand the City says this is a dangerous roadway because it lacks sidewalks, yet it is more important to have a tree and some grass on one mile than a 6 foot sidewalk being available to pedestrians making their way through the entire three miles of the city.

A-17-2

63-6 Response ID: 25 this answer tries to make the point that because 40,000 vehicles pass through Shoreline a day gives justification to this project. The City does not justify its position to build a lavish 1 mile piece of highway and then leave the balance of Aurora

unimproved. The City states "the project must satisfy many objectives beyond moving automobiles, including traffic safety, lighting, transit mobility, and cleaning up the clutter along Aurora". There are 3 miles that need improvement today and the City's plan will not meet the stated objectives.

63-7 Response ID: 236 if the reader of the EIS is to believe any of the City's contentions that the proposed project will bring more safety to Aurora, then Response ID: 236 is a falsehood. It would be the City's contention that better street lighting, better signalization, sidewalks and the removal of the Two-Way Left-Turn Lane will make the section of SR 99 between N 145<sup>th</sup> and N 165<sup>th</sup> safer. On the other hand the City states in ID: 236 that Safety is not being compromised". So is it the contention of the City that better lighting, better signalization sidewalks wouldn't make the 2 miles of SR 99 between N165<sup>th</sup> to 205<sup>th</sup> safer just like they contend on the first mile. Since the obvious answer is yes these improvements would enhance safety, the City is compromising safety of its citizens for the sake of amenity zones, underground power and excessive right-of-way property condemnations.

A-17-3

63-8 Response ID: 237 does not answer the question. A "No Build" alternative according to the FHWA can include safety upgrading such as sidewalks and continuous highway lighting. Such improvements should have been factored into a "No Build" option. It would appear that it was the intent of the author(s) of both the DEIS and the EIS to make the "No Build" option as distasteful to citizens as possible.

63-9 Response ID: 117 is ignorant and racist. Nowhere in the text of the DEIS or the EIS are the quantity of minority businesses detailed on this section of Aurora Avenue. This one mile section has the largest group of minority owned businesses than the last 2 miles combined. When one refers to ID: 25 one of the objectives of this project is "cleaning up the clutter" the City's polite way of accomplishing ethnic urban renewal.

63-10 Response ID: 238 the reworded text has gone from "unsightly commercial strip" to "clutter". The City has failed to name who is making these poorly worded assessments the City of the author(s) of the EIS and what businesses are in their eyes "clutter" and which ones are viable?

63-11 Response ID: 74 crash data such as this is only used to confuse readers and is used as a scare tactic. The City failed to answer, and confirm that this 3 mile section of Aurora is not even among the list of the 71 most dangerous sections of highway in the State of Washington. The City refused to truthfully answer the question as posed because it shows that their intent is to mislead the public.



63-17 Response ID: 50 much of this response is baffling. First of all the BAT lane is not a through lane except for transit which at this time number about 40 busses a day. The City compares it with a six-lane highway which it would not be. Secondly WSDOT Design Manual can change as often as fashions do at the whim of the Secretary of Transportation. Thirdly how can one compare the accident statistics of "urban principal arterials" to that of a "state highway"?

63-23 Response ID: 40 this response does not address the question of regardless how wide the sidewalk is or whether or not is has an amenity zone are pedestrians comfortable walking along any urban commercial highway and what statistics are available from any source to back up the City's assertion?

63-24 Response ID: 245 if the information that is offered in the explanation is true the City has provided excellent evidence as to why this grandiose project should not be built and a scaled-back project put into place that would include all 3 miles of Aurora.

63-25 Response ID: 246 continues to quote WSDOT that this corridor is "critical in its 20-year plan" yet skirts the main issue which is why isn't the entire corridor being enhanced with the money that is available now?

63-26 Response ID: 247 this response refers one back to "How This Project Will Provide Independent Utility" in Chapter 2 of the EIS. This section of the EIS doesn't address the bottle-neck that the reduction of roadway at N 165<sup>th</sup> will create which both north and south bound traffic will encounter. It is the Pollyanna attitude of the author(s) of the EIS that drivers will not abuse the new BAT lane-yet these are the same drivers that the author(s) of the EIS claim abuse the current Two-Way Left-Turn lanes. This contention makes no logical sense.

A-17-4 | On page 231 the last paragraph which continues onto page 232 deals in freight mobility on Aurora yet this question was ignored by the author(s) of the EIS.

63-27 Response ID: 247 which again refers one back to "How This Project Will Provide Independent Utility" simply does not address the questions posed. If any source were to be referred to in answering these questions it should be from the Value Engineering Study.

A-17-5 | 63-28 Response ID: 47 needs to be addressed paragraph by paragraph.

A-17-5  
CONT.

1. Paragraph one states that traffic volumes "continue to grow, placing an ever increasing demand on our transportation". It goes on to say "our state highways and arterial systems will have to bear much of the upcoming growth, and Aurora Avenue is no exception". If the author(s) of the EIS or the City give those statements any credibility logic would dictate you improve all 3 miles with the dollars that are available today.

2. The second paragraph tells the reader "improved signal timing plans that move traffic more efficiently" which might be a true statement if the entire 3 mile corridor were being improved. This project will only decrease the LOS at every signaled intersection between N 165<sup>th</sup> and 205<sup>th</sup> street. This plan may get commuters through the first mile with less time lost at the new synchronized lights but that only means traffic will only hit the "dumb" signalized intersections faster-which will result in spill-over traffic into the neighborhoods.

3. Paragraph 4 states "Based on national statistics, accidents are expected to immediately be reduced by 20 percent with the new lane configuration". This statement is made in reference to converting the TWLT lanes into "focused left turn u-turn lanes". The EIS fails to detail just what statistical reports or data it used to make this assertion. According to NCHRP ) my exhibit 22) that "the impact of an increase in the u-turns on the safety of the road is not clear". The NCHRP with the assistance of FHWA and AASHTO are studying the safety of these maneuvers but that report is not slated for release until May 6, 2003.

4. Paragraph 4 assumes that all of the traffic along Aurora is commuter traffic which will be affected by signalization. Traffic is constantly entering and exiting businesses, along with vehicles making "free right turns". The current TWLT lane will accommodate from 1 to 12 or more vehicles wishing to make a left turn. Restrictive left turn or u-turn lanes can cause traffic to back up into travel lanes causing more back-ups or erratic lanes changes causing accidents.

5. Paragraph 5 speaks of the Transit Signal Priority System is planned all along SR 99 from South Snohomish County through much of King County and should not be touted as a feature of this project. Even the 2 miles that will be left out of other improvements will receive this system.

63-29 Response ID: 248 does not address the question as asked. The City states on page 1-5 in the DEIS that "The needs for improvements along Aurora Avenue North have long been recognized by local governments". This statement is made by the City to justify this project. The City has already admitted that there are no funds to complete all of the needed improvements between N 165<sup>th</sup> and N 205<sup>th</sup> street. The cities of Edmonds, Lynnwood, and now South Everett have taken the funds available to them and have given users of SR 99 complete projects. These cities did so by scaling back on extras cost items to provide transportation utility and safety for the entire section of SR 99 that travels through their towns. Doesn't the City of Shoreline bear the same fiduciary responsibilities as Edmonds, Lynnwood, and Everett to the citizens of Shoreline and to those taxpayers who utilize Aurora Avenue?

63-32 Response ID: 39 makes the statement "It is unlikely that potential customers would drive through the project area to reach businesses in Seattle or Snohomish County" but no study data or survey results are quoted. The author(s) of the EIS attempt to confuse the reader with their inclusion of Seattle being a great distance away from the area when one of its city limits begins 30 feet from the beginning of the project, and the end of the project is only 1 mile away-2 miles away from the border between King and Snohomish County. Every business in the first mile will be put at a disadvantage because of median restrictions in competing with other Shoreline businesses that have full freedom of access and egress just up the highway.

A-17-6 | Page 233 paragraph 3 was ignored by the author(s) of the EIS.

63-33 Response ID: 249 does not address the much larger question which is if the Comprehensive Plan's intent to "balance vehicular, transit, and pedestrian needs" then it is not possible for the DEIS or the EIS to conclude that there can be any other Logical Termini other than 205<sup>th</sup> street. It is not correct for the author(s) of either the DEIS or the EIS to use the Comprehensive Plan as a reference when it suits them, and then to ignore it when it does not suit their contentions.

A-17-7 | 63-36 Response 83 refers the reader to a section of the EIS titled "Areas of public controversy" yet this is not listed in the Table of Contents. Why?

A-17-8 | 63-39 Response ID: 39 does not address the questions at hand. How can the DEIS and the EIS quote the wishes of the CATF when there is virtually no record of their meetings, how they were held, who was in attendance and how they voted and whom decided on what was voted on?

63-40 Response ID: 83 does not address the fact that the WSDOT's own recommendations were not followed for the planning and formulation of this project. Is it the assertion of the author(s) of the EIS that it is permissible to follow some regulations and ignore others that may not suit their end goals?

A-17-9 | 63-41 Response 250 asserts that the CATF was commissioned "with establishing a design concept for Aurora" yet according to taskforce members they were spoon-fed proposals from employees of the City and got to choose from variables presented. This is not the intent of such appointed taskforces. The response of the author(s) of the EIS that the CATF design concept was for "Aurora 145-205, yet they claim N. 145<sup>th</sup> to N 165<sup>th</sup> construction plans do not lock in the design for the balance. Simple logic would dictate

A-17-9  
CONT. that if virtually every "idea" offered by the CATF except for a reduction in the speed limit has been adopted for mile 1 it will also be adopted for the remaining 2 miles.

63-42 Response ID: 97 does not address the social impacts that medians can, and have had on other communities. This answer also does not address the economic downturns suffered by other communities because of medians. The author(s) of the EIS quote the City's wish to revitalize the business community yet fail to address the real-life fact that such projects have severely damaged not only business districts but also the surrounding neighborhoods on urban commercial highways in other cities across the United States.

A-17-10 63-43 Response ID: 251 expects the reader to refer to a report that would not be in print by NCHRP until January 2003. How is the reader supposed to accomplish that when the EIS was printed in November 2002?

63-44 Response ID: 37 never addresses the findings of TCRP report #26 which analysis of BAT lanes that shows that the effectiveness of the lane for transit in reducing commute time is reduced or eliminated because of vehicle's either entering or leaving businesses. Paragraph 3 also cites "The right-turn and transit lanes in Seattle had some increases in traffic accidents associated with them initially. However, the accidents on the Seattle portion of Aurora Avenue were do to a lack of necessary access safety measures such as median and safe driveway design. Traffic accidents on Aurora in Seattle resulted when traffic attempted left-turns from two-way left-turn lanes crossing three lanes of traffic". What scientific report was done to substantiate this claim? How does a left-turn across three lanes of traffic differ from a two-way left-turn lane or from a median left-turn lane?

63-45 Response ID: 252 has a childlike response to the question posed. The City did not respond to "The Field of Dreams" question "if we build it will they come" and the answer is other industrial countries have made the same attempts to get commuters out of their personal vehicles and into mass transit and it has been met with little success. If the real mission of this project is coping with traffic through the City of Shoreline through 2020 then all three lanes should be general purpose lanes.

63-46 Response ID: 253 states "Business Access and Transit lanes would be continuous so that confusion would be avoided. This would be an improvement over the design for the outside lanes on the project built on SR 99 in Lynnwood/Edmonds/South Snohomish County". The first thing that comes to mind is that the City is acknowledging that contrary to their claims N 165<sup>th</sup> to 205<sup>th</sup> plans are cast. Secondly for a commuter traveling from south Everett to Seattle will enjoy a fairly simple roadway for 10 or so miles with three lanes open for travel for much of the distance until they hit the "Shoreline Chicanes".

A-17-11 63-49 Response ID: 56 ignores the question completely. The state of California and the province of British Columbia have banned u-turns on urban commercial highways. The Institute of Transportation Engineering Council terms u-turns as "undesirable turning movements". Unsignalized u-turns may be more dangerous than a TWLT lane but unfortunately the NCHRP along with AASHTO will not publish their report until May 6, 2003 for clarification. The City, WSDOT, and the author(s) of the EIS maintain this to be a safe design but lack the scientific data to back up that assertion.

63-52 Response: 256 SR 99 through Shoreline is not just "an Urban Principal Arterial" it is a Federal Highway and the City needs to refer to it as such. State Farm Insurance Company shows 145<sup>th</sup> and SR 99 to have a higher than average number of alcohol related car crashes. Doesn't that mean we need better police not better roadway?

63-53 Response ID: skirts the complete issue. Throughout the EIS the safety of this project is touted and accident statistics in regards to HAL's and PAL's are often noted. The author(s) of the EIS have not responded as to why according to the King County Public Health Department all SR 99 in King County has more than 5 times the number of alcohol related accidents, and nearly 8 times the number of crashes compared to other state highways. Even though areas such as SeaTac have "improved" SR 99 SE 188<sup>th</sup> and SR 99 is still one of the deadliest intersections in the state.

63-54 Response ID: 74 again attempts to confuse the reader with improper comparisons. Not all Urban Principal Arterials are Federal Highways. How high is high according to WSDOT. None of the intersections in the City of Shoreline is in the top 72 of WSDOT's list of HALs.

63-56 Response ID: 33 can only be described as outrageous. N. 165<sup>th</sup> is a small two lane road with no sidewalks. It is obvious that none of the author(s) of the EIS are familiar with this area or they could never make the comment "Little or no traffic diversion onto neighborhood streets as a result of this project alternatives is (sic) anticipated". The Main access for North Seattle Community College is 160<sup>th</sup> which is a 4 lane road to help compensate for the College traffic. A traffic light at 165<sup>th</sup> will encourage students to access the College via N 165<sup>th</sup> because of the heavy back-ups that occur at N 160<sup>th</sup>. It is only human nature for people to find the easiest and fastest way to their destination. N 165<sup>th</sup> has no sidewalks and coming eastbound has a blind spot just over the top of the hill near Fremont. This street was never engineered for anything but local traffic.

63-59 Response ID: 27 only the author(s) of the EIS would believe that during the several hours of rush-hour traffic that transit won't wait until the last minute to pull back into traffic as the BAT lanes end. Then there will be the motorists who will abuse the lane

who will have to cut back into line. I don't want excuses about the police solving the problem they can't even deal with our alcohol related crashes. There clearly will be bottleneck conditions created by this design.

63-60 Response ID: 259 cites studies but where are the pedestrians along SR 99 in Edmonds and Lynnwood. I drive through there often and I didn't see many prior to construction and I don't see many now. On International Boulevard (SR 99) in SeaTac I do not see families flocking to enjoy their grand street. Most of the people out on SR 99 in SeaTac are young people that many businesses would not see as an asset hanging out in front of their businesses.

A-17-12 | 63-67 Response ID: 147 has nothing to do with the question as posed and are simply not answered. There is nothing in the response tendered by the author(s) of the EIS that comes remotely close to the question.

63-74 Response ID: 267 does not address the fact that Table 3-5 is mostly conjecture and heavily waited toward building the project. An EIS should not be tainted by those who stand to gain by its approval.

63-75 Response ID: 56 gives no information as to what data was used by the City or the author(s) of the DEIS to make the statement "crash experience would be expected to worsen". In other cities "pedestrian refuges" have turned into pedestrian killers because they invite jaywalking. Left-turn or u-turn lanes are unproven so what source is used to backup their statement?

A-17-13 | 63-76 Response ID: 74 leaves much dispute about the accident rate on Aurora through Shoreline. It is true that WSDOT keeps track of accidents and does so by Mile Post. It is also clear that it is improper for the author(s) of the EIS to include part of North Seattle in its findings. The first bullet point on Response ID: 74 lists as one of the HAL locations MP 40-21 to MP 40.59 (N 140<sup>th</sup> to N of N. 145<sup>th</sup>) which would for the most part be outside the city limits of Shoreline.

63-77 Response ID: 268 really substantiates why Parsonson et al is not a valid study to use as a data source for this project. Parsonson et al as stated in my question to the author(s) of the EIS did not include roadways with left-turn or u-turn lanes so the safety of these "turn pockets" is unknown. The author(s) of the EIS state "Some of the research covers projects with longer distances between left-turn/u-turn opportunities" yet cite no actual studies by name. This gives the reader a false sense that the author(s) of the EIS have actually studied these lanes. There are hundreds of highway studies and even more so-called "experts" but without citing an actual study by name the author(s) of the EIS

may well be comparing suburban highways to urban commercial highways. The author(s) of the EIS further indict themselves because in the next sentence they state "When the distances between left/u-turn opportunities are longer, then convenience for access to businesses is reduced while overall traffic safety is likely improved. If the author(s) of the EIS actually had the studies they purport to have there statement would not contain the word "likely", this is just conjecture on the part of the writer(s). The author(s) of the EIS really show their hand in the last sentence of their response "if a high number of accidents result from a left/u-turn location, that location may be eliminated". If there was real data to substantiate the author(s) contentions in this response they never would have ended their comment with a statement like that.

63-78 Response ID: 259 states that the "International Boulevard Sidewalk Impact Study conducted by the Center for Applied Research on International Boulevard Phase 2 provides findings that support the alternatives developed for the Aurora Avenue 145<sup>th</sup> to 165<sup>th</sup> project. According to that study Hunter et al quoted in the study found that only 7.9 percent of pedestrian/motor vehicle crashes were related to "walking along roadway". According to Hunter et al overrepresented variables were pedestrians 15 to 44 years of age, alcohol involvement by the driver or pedestrian, rural two-lane roads, dark conditions, and interstate and county roads. Nowhere in Hunter et al does the lack of sidewalks play a role in pedestrian/motor vehicle accident. In 1996 according to the International Boulevard report Knoblauch et al did an analysis on pedestrian/motor vehicle crashes and "exposure under various roadway situations, locations with no sidewalks were more than twice as likely to have pedestrian/motor vehicle crashes than sites where sidewalks existed. The presence of a sidewalk was found to have a particularly large safety benefit in residential and mixed residential areas. However, sidewalks had no effect on pedestrian/motor vehicle crash experiences in commercial areas". The author(s) of the EIS either never read the report they cite from or have deliberately attempted to deceive the reader. Knoblauch also noted on page 19 of his report on International Boulevard "Because other street improvements (i.e.; median, repaving, new crosswalk) were also done at the same time, it was not possible to attribute any of the effects observed solely to the sidewalk improvement.

63-80 Response ID: 259 does not address the fact that previous to the EIS being printed the last pedestrian/motor vehicle accident was a bicycle rider and a automobile-yet there are no provisions in this project for bicycle lanes to protect the safety of these commuters. The City certainly should have taken this into consideration as other cities have. The last pedestrian fatality on Aurora Avenue in the City of Shoreline was in a marked crosswalk- so exactly how would sidewalks have in any way saved these victims?

63-81 Response ID: 269 basically states that the author(s) of the DEIS pulled non-scientific numbers out of thin air. Any statistics or data should come directly from Metro or none should be used at all. The inclusion of this statement is more proof that the DEIS

and the EIS are not set out to be fair assessments of the impacts of this proposed project, but only the author(s) clear intent to write a "pro" project piece.

63-82 Response ID: 270 touts "These openings will make it possible for trucks and emergency vehicles to make left turns into properties along the corridor". According to page 3-51 of the DEIS the City claims that there are 52 businesses in this 1 mile of Aurora between N 145<sup>th</sup> and N 165<sup>th</sup>. The City claims on page 1-5 paragraph 2 of the EIS "The timely delivery of goods is extremely important to business operations and economic vitality" After making such a statement the City admits that there will only be a limited number of left/u-turn lanes so obviously not every business will be able to be reached with a left-turn. Therefore a u-turn will be necessary and according to page 3-16 bottom paragraph, and in Response ID: 270 only vehicles in a WB-55 class will be able to accomplish a u-turn in the radius provided in the proposed plan for Aurora. A WB-55 class truck has a wheelbase of approximately 159 inches which might sound impressive except a Subaru sedan had a wheelbase of 104.3 inches. A WB-55 is considered a light duty delivery truck. Many of the businesses affected by this proposed project receive freight on a daily basis and in some cases in large quantities. Some of the vehicles that are in and around delivering to Aurora businesses who utilized vehicles with wheelbases longer than 159 inches are UPS, Federal Express, Viking Truck Company, Oak Harbor Freight, and Conway. Many of these companies deliver to a number of businesses on both the east and west side of the highway. Truck drivers are under tight schedules and if it is difficult to travel on Aurora already crowded arterials will be used along with residential streets so that they can accomplish their deliveries. (Exhibit 63-82)

63-83 Response ID: 271 specifically asks the City to provide "scientific data which was used to substantiate the City's claims that in their claims outlined in A, B, and C of question 63-83. The City's response clearly conjecture which is not based on any provable fact.

Paragraph 2 on page 246 is not addressed by the City and the point is pertinent. According to King County Aurora Avenue is not considered part of the arterial system. Some sections of SR 99 are considered to be classified as part of the arterial system-but not in Shoreline. It simply is unfair to accident statistics from real arterials, much of which are Interstate Freeways and rural arterials and then compare them with the accident statistics of Aurora which is an urban commercial highway. (Exhibit 1)

A-17-14 63-84 Response ID: 84 again the answer does not answer the question. The City maintains that this project "will help future development attain transportation concurrency" is laughable. Every roadway, especially a Federal Highway should share commonality for its length, not change as it enters each new city limit. What would our Freeways look like if every time a city limit was crossed it took on a new look with different lanes for different purposes?



63-85 Response ID: 245 cites a "leading reference book entitled: 'Public Transportation' by Gray and Hoel. What the writer(s) of the EIS do not tell you is this book was published in 1979 and would have to be considered outdated. It is clear that by King County Department of Transportation-Metro Transit division that we as taxpayers already subsidize transit heavily through State and Federal programs. (Exhibit 63-85)

A-17-15 63-Response ID: 119 answer "Cumulative impacts is a study of the net incremental impact of this project and other reasonably foreseeable projects. If the reader is to take that answer literally then the City has admitted that this EIS should have covered the entire 3 mile section of Aurora, not just the first mile. It is also odd that the City the plural term "projects" yet on page xxiii states that there are only "two improvement projects for Aurora Avenue North from the southern City limits at North 145<sup>th</sup> Street to the northern City limits at North 205<sup>th</sup> Street". The Sub-Area plan had to been known to the author(s) of the DEIS and the EIS yet was not disclosed. It is also interesting that on page xxiii of the DEIS it is stated "there is no certainty regarding if or when additional funds will become available" referring to N 165<sup>th</sup> to N 205<sup>th</sup>, and page 2-4 of the EIS states "Improvements along Aurora Avenue North from North 145<sup>th</sup> Street to North 165<sup>th</sup> Street will not preclude other forms of project designs". Those two statements would indicate that the future for any roadway project between N 165<sup>th</sup> and N 205<sup>th</sup> is pretty much in the air, with that being the case how can they be termed "reasonably foreseeable projects" for the EIS?

63-95 Response ID: 116 attempts to give the reader of the EIS the illusion the City was concerned about performing the proper studies. The author(s) of the EIS state "A joint decision between FHWA, WSDOT, and the City of Shoreline was made on the appropriate level of documentation for NEPA" The author(s) of the EIS seem to have forgotten to mention that the City of Shoreline attempted to slide this project past the FHWA with just a Categorical Exclusion-well short of an EIS. Only when the Shoreline Merchant's Association brought to the attention of the FHWA that there was a great deal of opposition to the project the City was then ordered by the FHWA to perform an EIS. The City was not upfront in their duties and responsibilities from the beginning.

63-102 Response ID: 271 makes the claim "Access safety improvements, including the median, would enhance access to properties by providing safer and easier access". If any part of that claim were true why can't the City produce any businesses between N 145<sup>th</sup> and N 165<sup>th</sup> that believe this project as it now stands is an will "enhance" their business access? Virtually every business owner along Aurora signed a letter against this project being built. Would it be the City's position that the business owners are too stupid to know what is good for them? Why didn't the author(s) of the EIS address the result of medians on Portland Oregon's Union Street, or Atlanta Georgia's Memorial Drive which

are similar to Aurora? The author(s) again present a "Pollyanna" viewpoint without any hard facts presented, and ignore those which have been tendered.

63-104 Response ID: 279 nothing in the question refers to transit-it speaks to construction vibration caused by bulldozers, road graders, pneumatic hammers, dump trucks, cement trucks, ground compactors, paving machines. Many of the businesses are close to the right-of-way and construction vibration and resulting property damage should be assessed and studied.

The last paragraph on page 250 and the first three on page 251 have been ignored. It is not conceivable that the letters attributed to Chief Mehlert and Chief Orndorf were not extracted by political force because the comments simply go against what actually occurs by police and firefighters when they use Aurora Avenue to respond to emergencies. Their statements go against simple logic. Page 3-50 beginning with the last paragraph, and resuming on page 3-51 top paragraph the author(s) of the EIS agree by making the statement "based on the preliminary median design, access to some properties for emergency vehicles would be slightly less direct, thus increasing emergency response times".

63-106 Response ID: 117 is nothing short of a lie. Whether or not the author(s) of the EIS wish to admit it Aurora Avenue through Shoreline has been segmented into 3 separate projects. Of the three segments N 145<sup>th</sup> to 164<sup>th</sup> has the highest percentage of minority owned businesses. Of the 52 listed businesses listed by the City 22 are owned by minority owners. According to a recent census minorities comprise approximately 23 percent of the population of the City of Shoreline, yet in this one mile of Aurora minorities own approximately 42.3 percent of the businesses affected by this project. The type of businesses mainly owned by minority business people in this mile of Aurora depend on excellent access and egress which will be greatly reduced by the City's own EIS. This certainly would have to be addresses as an adverse impact.

63-107 Response ID: 280 refers to "By professional judgment it has been determined that wider sidewalks would result in fewer pedestrian and bicycle conflicts". Professional's who make "judgments" have names, usually have published articles, and have respected backgrounds, yet no wishes to take credit for this statement. There is, however, documentation which was supplied that commuter bicyclists do not want to ride on sidewalks. If commuter bicyclists don't like to ride on sidewalks then would it be the contention that the sidewalks should be made wide to lure children out to ride up and down on a Federal Highway?

63-108 Response ID: 234 seems to forget the Purpose, Need, and Objectives section of the EIS page xvii. This section states "The purpose of this project is too improve the

safety of all users on Aurora” and “to improve the multimodal mobility”. Other states such as New Jersey’s DOT have determined that bicycle commuters and pedestrians do not mix on sidewalks. AASHTO recommends dedicated bicycle lanes for the safety of the riders. Asking bicycle riders to share a lane with wide transit busses and right-hand turning vehicles certainly does not address the safety of bicycle commuters, nor does it address true “multimodal mobility”. Nor does it address the fact that transit will either have to slow down when encountering a bicyclist or encroach in the next lane to leave a margin of safety for the rider. Most bicycle riders will be on the highway during commute times. Because of heavy congestion the transit busses will not be able to encroach into the next lane so they will be forced to slow down thereby diminishing any advantage a BAT lane might provide in travel time savings.

A-17-14 63-109 Response ID: 221 uses two reference guides to support the author(s) of the DEIS contention that “Some businesses might experience a temporary increase in revenues” on page 3-55 of the DEIS. Those two references are listed as “Input-Output Economics” 2d edition By Leontief, and “A User Handbook for the Regional Input-Output Modeling System” (RIMS II) 3<sup>rd</sup> edition. Apparently the author(s) of the EIS have not read those books or manuals and by making reference to either attempt to deceive the reader. Leontief’s book was first written in 1973 and reprinted in 1986 with some revisions. Leontief’s claim to fame was a formula he created to create a model for regional, national or international statistical input-output economical factors. Leontief was awarded the Nobel Prize for his work in this area. RIMS II is touted as a “regional input-output (I-O) multipliers, which account for inter-industry relationships within regions, and are useful tools for conducting regional economic impact analysis. According to provided documentation RIMS II applications have been used to estimate the “regional economic impacts of the following: opening or closing of military bases, hypothetical nuclear accidents, tourist expenditures, new energy facilities, energy conservation, offshore drilling, opening or closing manufacturing plants, shopping malls, new sports stadiums, and new airport or port facilities”. 1 mile road construction projects are not listed. Looking at real-life construction impacts on three different road projects in the United States two in Illinois and one closer to home just north of Shoreline in Mukilteo the actual business affected by road construction seem to have a strikingly different view than that of the author(s) of the EIS. In real life, not in some laboratory, these people are suffering because of lost revenue, but they are forced to lay-off good employees. Quite a different picture from the one presented by the author(s) of the EIS from their statement on page 3-59 paragraph 2 “Some businesses might experience a temporary increase in revenues from the increased construction and purchases by construction workers”. (Exhibits 63-109)

63-111 Response ID: 281 suggests that currently that a problem exists in entering businesses via a right-hand turn which there is not. The problem will affect businesses on both sides of the street because access via a left-hand turn will be reduced. It is human nature to follow the path of least resistance. Secondly the author(s) of the EIS seem to be of the opinion that this project will ease congestion yet cite no proof of that contention. I

would refer the author(s) of the EIS to the study done on this subject by the Texas Transportation Institute titled "Easing the Burden". According to that study "places that have built the most roads haven't had much success in slowing growth in congestion. Even though road building has been outpacing population growth in the metro areas studied". The study also relates "One of the reasons that road-building shows disappointing results in easing congestion is that adding capacity to highways doesn't just meet the current travel demand: it actually spurs additional driving. When a road is widened, more people will choose to drive on it-either switching from another route, time of day, mode, or taking additional trips". (Exhibit 63-111)

63-112 Response ID: 47 makes statements but has no statistical data to backup the author(s) of the DEIS and the EIS assertions that this project will ease congestion at all. The author(s) of the DEIS and the EIS completely ignore the source quoted.

63-113 Response ID: 282 is ignorant at best. European Motors is no different than a grocery store-you live and die by shelf space. If you reduce the shelf space in a grocery store your sales will go down because there are fewer products to sell and fewer choices to attract consumers. The same is true of an automobile dealership. The author(s) of the EIS indicating "businesses may be forced to reorient their inventory" is foolish because it takes space to have an inventory. The author(s) of the EIS indicate this matter is addressed in Chapter 3 under economics. The only comment that seems to fit in this chapter is on page 3-59 paragraph 2 where the author(s) of the EIS state "A potentially large decline in revenues could result in business failure or cause a business to move to a different location". That is quite a heart-felt commitment from the City to the Aurora businesses.

A-17-17 | 63-114 Response ID: 119 states it is the goal of the final EIS to perform "an analysis of secondary and cumulative impacts" on "other reasonably foreseeable projects". Then why isn't a full EIS being done on the full three miles? An EIS on N 145<sup>th</sup> to N 165<sup>th</sup>, and an EIS from N 165<sup>th</sup> to N 185<sup>th</sup> and the another EIS from N 185<sup>th</sup> to N 205<sup>th</sup> may not provide all of the negative impacts these projects can produce because of segmentation.

A-17-18 | 63-116 Response ID: 159 indicates that "Flows to Boeing Creek would remain at current levels". At this time storm water runoff is not channeled by curbs so its volume is spread out over a wider area taking longer to reach the creek. Based on this how can the water flow be kept at the current level?

63-117 Response ID: 284 evades the question completely. 36 citizens of the City of Shoreline apply to be members of the CATF of which 13 "positions" are appointed by the Mayor and are approved by the City Council. The author(s) of the EIS like to remind the reader that this was an Ad Hoc Committee, without official board status, yet every one of

their recommendations was not only taken into consideration, but is part of the final design. 1300 other public comments were made and the City nor the author(s) of the EIS cannot come up with even one suggestion out of those 1300 that was given due consideration and used in the final design plans. We have a hand-picked group of CATF members by the Mayor and interestingly enough only their "suggestions" are taken into consideration for the final design. It is even more interesting that members of the CATF report that they did not start from a blank slate but were given many options at each meeting that were "spoon-fed" to them by City staff and consultants hired by the City. One has to question the legitimacy of the CATF because it would appear it was only a group of citizens used to provide the Empire Builders of the City with the plan they wanted all along.

A-17-19 | Page 254 paragraph 3 deals with another city's problem with a raised center median's safety yet the question is not addressed by the City or the author(s) of the EIS.

63-119 Response ID: 287 only deals with half of the question which is "how often these areas will be, or are expected to be maintained". The current medians in the City of Shoreline are overgrown with weeds and are a blight on the community. The current medians are made of asphalt; one has to consider what medians made out of dirt will look like. How does the City expect to be able to afford to maintain medians and amenity zones when they can't take care of the ones that exist now?

63:120 Response ID: 287 basically says we don't know what chemicals will be used. This is an EIS and there is no reason that information was not provided.

Log #A-18

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

From: unclemym@msn.com  
Sent: Thursday, July 03, 2003 11:28 AM  
To: Leighow, Dave  
Cc: CarePlus@CMC.net; cbelster@earthlink.net; crows4u@aol.com;  
hia@CMC.net; Higharena@aol.com; JanetWay@YAHOO.COM;  
JohnChangShoreline@hotmail.com; kencott@webtv.net;  
Larrywgmgoldies@aol.com; loveyourplants@uswest.net;  
Maralyn\_Chase@msn.com; mfimia@zipcon.com; Sales@exoticmeats.com;  
SherwoodSage@juno.com; unclemym@msn.com; whagen@CMC.net  
Subject: City of Shoreline

Dear Mr. Leighow,

My name is Myron Phillips and I co-chair a group here in the City of Shoreline called the Shoreline Merchants.

For the past three years, my group has been trying to lessen the impact of the Aurora Corridor Project (Highway 99) through our city. We 300 or so businesses feel our access will be greatly diminished (and in some cases lost!) and there has been no way to convince our city that the plan needs to be modified.

When Shoreline became the Lead Agency for the project, they decided to divide it into three phases. They have reached the point of getting, perhaps, a FONSI on Phase I. As the environmental process was going on, they decided to go ahead with a land-use decision for the second phase. What they are trying to do is set the ROW for this second phase BEFORE approval by Federal Highways. The footstep for Phase II will be identical to Phase I and set the ROW between 110-120 feet. We feel this is wrong and, if Federal monies are used to complete the entire corridor, then they must use our Federal NEPA guidelines. Obviously, they are trying to pull a "fast one" on their own businesses. Their actions from the beginning included lying to our businesses. For this reason they were made to do a more comprehensive environmental study..a SEPA EIS and a NEPA EA. They did a lousy, incomplete job on that! Elizabeth Healy of your office has seen these documents, along with Dan Mathis.

- A-18-1 | What we need from you as I know you are the ROW expert is: 1) If a design (done by CH2MHill) is in place for the ENTIRE corridor, how can they attempt to set ROW at this time? 2) Since CH2MHILL did their environmental study for them and Federal Money has been used to pay them, hasn't Federal monies been co-mingled for the city's study? (Also, doesn't CH2MHILL being used for Design and Environment give them a HUGE conflict-of-interest?) 3) If the city sets ROW at this time, it is my understanding that Federal Highways will not re-imburse them later for ROW acquisitions..is this correct?
- A-18-2 |
- A-18-3 |

Thank you so much for taking of your time to help us out.  
Sincerely, Dr. Myron G. Phillips

ATTACHMENT 6

# **Errata to Environmental Assessment**

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## ATTACHMENT 6   **ERRATA TO ENVIRONMENTAL ASSESSMENT**

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Since the SEPA Draft EIS / NEPA EA was issued on July 5, 2002 , Alternative A Modified is designated as the PROPOSED ACTION in this FONSI. This recommendation was made by the project team and confirmed by the City of Shoreline Council action on December 9, 2002 and FHWA with this FONSI. This action was taken in response to comments received on the SEPA Draft EIS / NEPA EA from public agencies, and comments from the public.

The discussion on the description of the proposed action, impacts, mitigation measures are described in the SEPA FEIS titled SR 99, Aurora Avenue North Multimodal Corridor Project, north 145<sup>th</sup> Street to North 165<sup>th</sup> Street as issued by the city of Shoreline on November 27, 2002. This SEPA FEIS is incorporated by reference into this Finding of No Significant Impacts as a supporting technical document.

Impacts of Alternative A Modified fall within the range of impacts described in the SEPA DEIS / NEPA EA for the build alternative A and B.

As errata to the EA, the following text describes the Proposed Action (Alternative A Modified).

The proposed action would modify the existing state route by constructing a business access/transit (BAT) lane in each direction and installing a center median with left- and u-turn pockets. New signals would be installed at North 152<sup>nd</sup> Street and North 165<sup>th</sup> Street and existing traffic signals located at North 145<sup>th</sup> Street, North 155<sup>th</sup> Street, and North 160<sup>th</sup> Street would be modified. The BAT lane would serve transit buses and right-turning general purpose vehicles. Transit buses would be allowed to operate in the BAT lane throughout the entire length of the Aurora Corridor Project 145-165 area. The BAT lane would also allow general-purpose vehicles entering and existing businesses to accelerate and decelerate in a dedicated lane without affecting the speed of through traffic. This low volume lane would enhance safety by improving access to and from businesses and properties along Aurora Avenue North and also would increase the capacity of the general purpose through lanes by allowing traffic to maintain constant speeds. General purpose vehicles in the BAT lane would be required to turn right at each street intersection. Left turn/u-turn openings in the raised center median would be provided at signalized intersections at North 145<sup>th</sup> Street, North 152<sup>nd</sup> Street, North 155<sup>th</sup> Street, North 160<sup>th</sup> Street, and North 165<sup>th</sup> Street. Additional left turn/u-turn pockets would be provided southbound at Jiffy Lube/The Brake Stop, northbound at North 149<sup>th</sup> Street, southbound at Seattle Restaurant Supply, northbound at Westover Plaza, northbound at North 163<sup>rd</sup> Street, and southbound at Vons Square/Sarah's Auto Center. The width of the median at turn pockets would be 4 feet; left-turn lanes would be shortened at intersections with new left-turn pockets. In addition, dual left-turn lanes would be provided northbound at North 160<sup>th</sup> Street and eastbound on North 155<sup>th</sup> Street at Aurora Avenue.



Additional proposed improvements include constructing curbs and gutters on all sidewalks, planting street trees, and providing other pedestrian amenities. Continuous 7-foot-wide sidewalks would be constructed along both sides of Aurora Avenue North to provide pedestrian walkways that are safe and attractive; sidewalks would be narrowed where building conflicts exist. A 4-foot wide amenity zone would be constructed adjacent to the 6-inch curb, and would serve as a buffer between pedestrians and street traffic. Pedestrian railings would be provided as necessary to protect pedestrians at vertical grade separations, such as along retaining walls. North 160th Street would be closed to through-traffic on the east side of the intersection with Aurora Avenue North. The sidewalk and amenity zone would be continuous on the east side of Aurora Avenue North through this intersection.

Refer to Attachment 3 and 4 for a discussion of impacts and mitigation measures of Alternative A Modified.

Other revisions to the document are as follows:

Page 1-1 “Purpose of Project”, first paragraph – “The purpose of this project is to improve the safety of all users on Aurora Avenue North (SR 99). . . .”

Page 2-14 “Construction Staging”, third paragraph – “The first stage of construction would also involve construction of curbs and gutters, sidewalks, driveways, and other off-road appurtenances, and improvements to the stormwater drainage system. ~~The City would explore and consider the possibility of performing certain construction tasks at night to minimize daytime traffic delays and to speed the construction process. Only relatively quiet construction activities would be considered for nighttime.~~ In order to minimize impacts to businesses and other users, the City will construct the project as quickly as possible. This will include using the full range of construction hours allowed by the City's noise ordinance. The City does not intend to have construction occur beyond the hours currently allowed by City Code. Should it become necessary to work outside the allowed hours, a noise variance will be required.”

Page 2-18 “Permits and Approvals” – “City of Seattle Construction Permit—Necessary for construction activities in the right-of-way”

Page 3-3 “Affected Environment” – “Existing right-of-way width varies from ~~90~~ 100 feet to 130 feet over the length of the project.”

<b>Table 3-3</b> <b>2000 Existing p.m. Peak Intersection Level of Service Summary</b>		
Cross Street	p.m.	
	LOS	Delay (seconds)
North 145th Street	F	88.7
<u>North 145th Street</u>	<u>F</u>	<u>82.7</u>
North 152nd Street	G	30.2
<u>North 152nd Street</u>	<u>C<sup>1</sup></u>	<u>20.7</u>
North 155th Street	E	55.5
<u>North 155th Street</u>	<u>D</u>	<u>45.3</u>
North 160th Street	G	22.5
<u>North 160th Street</u>	<u>C</u>	<u>20.3</u>
North 165th Street	F	>100
<u>North 165th Street</u>	<u>F<sup>1</sup></u>	<u>&gt; 100</u>
Source: CH2M HILL, 2001		
<sup>1</sup> Unsignalized intersection		

Page 3-7 “Transit”, end of first paragraph – “This is one of the most productive routes in the Metro system, carrying approximately 7,000 daily riders, 4,000 of whom board and deboard in Shoreline. Buses on Aurora operate every 6 minutes during peak hours in the peak direction. Off-peak service is available every 20 to 30 minutes.”

Page 3-20 “Cumulative Transit Impacts”, 3<sup>rd</sup> paragraph – “Enhance bus shelters, transit lanes, and transit signal priority are among the improvements proposed in ~~both three~~ projects along the Aurora corridor (i.e., from North 145<sup>th</sup> Street to North 165<sup>th</sup> Street, ~~and from North 165<sup>th</sup> Street to North 205<sup>th</sup> Street, and Metro’s Bus Rapid Transit Project~~). Each of these projects would support an improved transit environment.”

Page 3-26 “Affected Environment”, 2<sup>nd</sup> paragraph, 3<sup>rd</sup> sentence – “~~There is a preponderance of are several~~ automobile-related businesses: automobile sales, rentals, repairs, and service stations.

Page 3-39 “Services”, after 7<sup>th</sup> paragraph on page – “Sewer trunks are also located where Aurora Avenue North intersects North 145th Street, North 155th Street, and North 160th Street.”

Page 3-51 “Affected Environment”, 5<sup>th</sup> paragraph on page, 1<sup>st</sup> sentence – “There are approximately ~~52~~ 86 businesses along Aurora Avenue North between North 145th Street and North 165th Street and an additional 27 businesses on sidestreets crossing Aurora Avenue North.



Constructed detention facilities are expected to be used for the required flow control of the runoff from the net new impervious surfaces created by each of the three build alternatives. Under both manuals, the detention facilities should be designed based on a continuous hydrologic simulation model, i.e. a computer model that estimates stormwater runoff flows from rainfall occurring across many years and not for just a single design storm. Both manuals agree on the design standard for the flows released from the detention facilities: durations of the flows released from the facility should not exceed the durations estimated for stormwater flows from the same area under predeveloped conditions for the range of flows from 50 percent of the 2-year peak flow up to the full 50-year peak flow. The duration of any given flow is the percentage of the time that flow occurs or is exceeded. For example, if under predeveloped conditions 2.0 cubic feet per second (cfs) is between the flows estimated as 50 percent of the 2-year peak flow and the 50-year peak flow and flows of 2.0 cfs or more occurred 0.5 percent of the time, then the detention facility can release 2.0 cfs or more only 0.5 percent of the time or less and similarly for all flows in the range from 50 percent of the existing 2-year peak flow up to the full existing 50-year peak flow.

Two parameters are required to calculate the sizes of the constructed flow control facilities: 1) the size of the net new impervious surfaces created by the project and 2) predeveloped land cover conditions for these new areas. The two manuals do not agree on what predeveloped land cover conditions are. The SMMWW defines predeveloped conditions as forested. The SWDM defines them as the conditions that existed in May 1979 when King County first adopted stormwater flow control standards. For the Aurora Corridor Project, the pervious areas that will be converted to impervious surfaces are now mostly vegetated with grass and some bushes and trees. These areas were similarly vegetated in 1979 because the project area has not changed much since then. Less stormwater runoff is generated from forested conditions than from the existing vegetation. Using forested land cover for predeveloped conditions will yield lower release rates from the detention facilities and larger detention storage designs. Therefore, the stormwater detention facilities will be designed based on the SMMWW standards (i.e., forest as the predevelopment condition), which are the more conservative criteria. Again, these criteria will be applied to the net new impervious surfaces only, in accordance with the regulations.

### **Quality Treatment**

For redevelopment projects, the SWDM requires basic quality treatment of stormwater runoff from new and replaced PGIS. PGIS include areas that are subject to vehicular traffic such as roadways, shoulders, and bike lanes within the travel lane of a roadway. Sidewalks are not PGIS. For roadways, replaced surfaces are those areas of the road where the existing pavement is removed down at least to the existing base course. Existing pavement that is overlaid and/or restriped is not considered replaced PGIS. The SWDM also requires basic quality treatment of stormwater runoff from new and modified pollution generating pervious surfaces (PGPS) if they are greater than 1.0 acre within a threshold discharge area. PGPS are any non-impervious surface with vegetative ground cover subject to use of pesticides and fertilizers. The SWDM defines the basic level of stormwater quality treatment as having a goal of removing 80 percent of the total suspended solids for a typical rainfall year.

Ecology's SMMWW differs from the SWDM for quality treatment criteria in several ways. First, the SMMWW requires quality treatment of stormwater runoff from only the new PGIS (not replaced), unless the roadway project creates 50 percent or more new impervious surfaces. If the net new impervious area is greater than 50 percent of the existing impervious area, then the SMMWW does require quality treatment of stormwater runoff from existing or replaced PGIS for roadway projects. Second, the SMMWW requires quality treatment of stormwater runoff from new and modified PGPS if they are greater than 0.75 acres within a basin. Finally, if the runoff is from a highway and it is discharged to a fish-bearing water, then the SMMWW requires an enhanced level of stormwater quality treatment. The enhanced level of treatment includes some removal of dissolved metals in addition to the basic goal of 80 percent removal of total suspended solids.

The SWDM and the SMMWW require special oil-control facilities for intersections where the average daily traffic (ADT) for the main road (Aurora in this case) is 25,000 or more and the ADT for the cross street is 15,000 or more. The special oil-control facilities are required at high traffic volume intersections since there is a higher probability of a spill due to an accident and there is a greater amount of leaked oil from the large number of idling vehicles at these types of intersections. The special oil-control facilities are specifically required to treat the stormwater runoff from only the intersection and the traffic lanes where vehicles accumulate during the signal cycle. There are two intersections within the proposed project area that have or would have traffic volumes high enough to require the special oil-control facilities. These are the intersections of Aurora Avenue North with North 145th Street and with North 155th Street.”

This project is being designed to be consistent with the Washington Coastal Zone Management (CZM) Plan delegated to and administered by Ecology. In accordance with the

CZM policy, a final determination by Ecology of proposed project's compliance with the CZM Plan cannot be made until after the EA/EIS is issued and all permits are received."

Page 3-88 "Regulations", after 3rd paragraph – **"Existing Stormwater Drainage System**  
Stormwater from the proposed project area is presently collected and conveyed in a system composed primarily of storm drains and a few areas with open ditches. There are two areas where the stormwater from the roadway flows overland onto adjacent properties: 1) along the east side of Aurora between the south project limit and Roosevelt Avenue (this area is in the City of Seattle limits), and 2) along the west side of Aurora between North 155th Street and Westminster Way. Conversely, there are many areas where stormwater runoff from the adjacent, offsite properties flows overland onto Aurora Avenue, which then is collected and conveyed in the road's drainage system (gutters and stormdrains). Stormwater runoff from many of the adjacent properties is also collected on-site and then piped to Aurora's storm drain system.

As mentioned above, there are only a few open ditches receiving storm drainage from Aurora Avenue north within the project limits. There is a ditch along the north side of North 155th Street between Aurora Avenue North and Westminster Way, and also one on the west side of Aurora Avenue North just north of 155th street (adjacent to the Denny's).

There are no existing stormwater quality treatment facilities or stormwater flow control facilities within the proposed project area.

There are no streams, lakes, or wetlands within the proposed project area.

#### **Proposed Stormwater Drainage System**

Under each of the three build alternatives, stormwater runoff from the roadway, the median, the sidewalks, and the amenity zone (where present) would be collected and conveyed in a mostly new storm drain system. Existing storm drains would continue to be used generally where they are in an appropriate location, have adequate capacity to carry the flow, and are in good condition. The stormwater would be conveyed to the same ultimate discharge location as under existing conditions. The stormwater would be routed through stormwater quality treatment facilities and detention facilities as required prior to discharge to the offsite downstream drainage system.

Stormwater from the adjacent properties that presently flows through the road's drainage system, would continue to be conveyed in the new drainage system for the road. The stormwater from the adjacent properties would not be treated or detained in the new facilities installed for the runoff from the project. A flow splitter would be installed upstream of each of the flow control and quality treatment facilities. Stormwater flows up to the water quality design flow would go to each of the quality treatment facilities and flows in excess of the water quality design flow would generally be conveyed around these facilities. For the detention facilities, the estimated equivalent flow from the offsite area would be routed around the detention facility throughout the whole range of flows, so that only the equivalent of the flow from the project area would be routed through the detention facility.

The stormwater detention facilities are expected to be vaults that would be installed under the roadway and/or sidewalk. The stormwater quality treatment facilities would most likely be

As indicated above, there are two intersections within the proposed project area that have or would have traffic volumes high enough so that special oil-control facilities would be installed for each of the three build alternatives, i.e., the intersections of Aurora Avenue North with North 145th Street and with North 155th Street. The special oil-control facilities would be catch basin inserts, baffle oil/water separators, or coalescing plate separators as required by the manuals. These facilities are engineered system specifically designed to separate free oils from the stormwater. Maintenance of the oil-control facilities would be handled by King County under contract with the City of Shoreline.”

Page 3-91 “Affected Environment”, 4<sup>th</sup> paragraph, 2<sup>nd</sup> and 3<sup>rd</sup> sentences – “The low infiltration rates limit/preclude the use of infiltration facilities for treatment/discharge of stormwater runoff. ~~Locations of the proposed water quality and detention systems, most of which will~~ The preliminary locations selected for the proposed stormwater quality treatment and detention facilities, which are expected to be underground structures (at North 155th Street, North 160th Street, ~~North 152nd Street [Boeing], North 152nd Street [Thornton], and Roosevelt Way [West Lake Washington-Densmore]~~), have not been identified as having problems with high groundwater; therefore, groundwater should not be a concern.

6.8	<i>Errata to Environmental Assessment</i>	<i>Finding of No Significant Impact SR 99, Multimodal Corridor Project: N 145th Street to N 165th Street</i>
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for the Boeing Creek basin include improvements to the North Pond or the M-1 dam, replacing the existing manhole at North 160th Street and Fremont Avenue with a new control structure, or installing a detention facility within a portion of the Westminster Way right-of-way.”

Page 3-92 “Boeing Creek”, 5<sup>th</sup> paragraph – ~~“A basin-wide planning-level effort for Boeing Creek watershed is currently under way. Through this planning-level effort the City is identifying concepts for further consideration as capital and/or maintenance projects to achieve basin-wide improvements. Concepts might include improvements to the North Pond or the M-1 dam, replacing the existing manhole at North 160th Street and Fremont Avenue with a new control structure, or installing a detention facility within a portion of Westminster Way right-of-way.”~~

Page 3-92 “Thornton Creek”, 1<sup>st</sup> paragraph – ~~“The mainstem of Thornton Creek flows from the Ronald Bog area south towards Twin Ponds and then southeast from the Twin Ponds, located approximately 0.75 mile west of Aurora Avenue North, is eventually piped under Northgate Mall, and then flows southwest to enter towards Lake Washington. The stream enters Lake Washington near Matthews Beach. The Thornton Creek mainstem is approximately 5.7 miles long, with an additional 12 miles of tributaries (Williams, 1975). Thornton Creek drains a watershed of basin approximately 7,402 acres (Thornton Creek Watershed Characterization Report, 2000), and the basin 7,200 acres (Dorothy Craig and Associates, 2000).is extensively urbanized.”~~

Page 3-92 “Thornton Creek”, 2<sup>nd</sup> paragraph, last sentence – ~~“This tributary flows into Twin Ponds. Flow from Ronald Bog is conveyed to Twin Ponds, and then into the main channel of Thornton Creek.”~~

Page 3-92 “Thornton Creek”, 3<sup>rd</sup> paragraph, 1<sup>st</sup> and 3<sup>rd</sup> sentences – ~~“The Watershed Characterization Report (Dorothy Craig AssociatesSeattle Public Utilities, 2000) indicates that although chinook and coho salmon have been found in Thornton Creek, only minimal numbers of these fish return to spawn when compared to the numbers that returned to spawn historically. . . . According to these maps, both species are found below the confluence of Maple Leafs Creek and Thornton Creek. Trout (cutthroat and steelhead/rainbow) were also identified as being found in the creek (Dorothy Craig AssociatesSeattle Public Utilities, 2000).”~~

Page 3-102 “Review of Information,” 7<sup>th</sup> bullet – ~~“Draft Thornton Creek Watershed Characterization Report and Water Quality Assessment (Dorothy Craig and AssociatesSeattle Public Utilities, 2000)”~~

Page 3-102 “Coordination with Agencies,” end of last paragraph – “The species of interest that have been identified so far for this project are chinook salmon (which are a listed species under the ESA) and coho salmon (which are a candidate species under the ESA).”

Page 3-103 “Aquatic Habitats,” 5<sup>th</sup> sentence – ~~“The West Lake Washington basin is an urban, semi-contained basin that outlets to the Ship Canal waterway discharges to Lake Union.”~~



Page 3-103 “Boeing Creek,” 4<sup>th</sup> paragraph – Williams (1975), during his work to identify salmonid use of Western Washington streams, recorded unknown salmon use of Boeing Creek prior to development within the basin. Chinook salmon are not presently found in Boeing Creek (Hennick, pers. comm., 2000; King County, 2001). Coho and chum salmon have been found in the creek downstream of the dam in the golf course, which is an impassable fish barrier. Salmonid habitat above this barrier is limited. ~~Sedimentation due to sedimentation and severe downcutting of Boeing Creek’s channel, offer little suitable habitat for salmonids.~~ Williams (1975), during his work to identify salmonid use of Western Washington streams, recorded unknown salmon use prior to development within the basin. As such, ~~cutthroat are the only likely residents of Boeing Creek above the golf course dam~~ (Williams, 1975; Boehm, 1994; King County, 2001). These species Coho and chum salmon may spawn within the lower reaches of the creek where suitable habitat occurs. Rearing may also occur for fry born in the creek. Cutthroat trout are found throughout the creek as residents and are the only likely residents of Boeing Creek above the golf course dam (Boehm, 1994; King County, 2001). Several programs have introduced coho salmon eggs and juveniles into the reach of Boeing Creek between the M-1 Pond and Hidden Lake.

Page 3-104 “Thornton Creek”, 1<sup>st</sup> paragraph – ~~“The mainstem of Thornton Creek flows southeast from the Ronald Bog, located approximately 0.75 mile west of Aurora Avenue North, and flows southwest to enter from the Ronald Bog area south towards Twin Ponds and then southeast from the Twin Ponds towards Lake Washington. The stream enters Lake Washington near Matthews Beach. The Thornton Creek mainstem is approximately 5.7 miles long, with an additional 12 miles of tributaries (Williams, 1975). Thornton Creek drains a basin of approximately 7,200 acres (Dorothy Craig and Associates, 2000). 7,402 acres (Thornton Creek Watershed Characterization Report, 2000), and the basin is extensively urbanized.”~~

Page 3-104 “Thornton Creek,” 2<sup>nd</sup> paragraph – “Thornton Creek is a lowland-type stream with numerous areas of the basin covered with large conifers in the residential communities (Williams, 1975). There are two small areas where stormwater runoff from the proposed project would drain to a tributary of Thornton Creek: the portions of North 145th Street and North 152nd Street. The centerline crest of the roadway that are in the project area that is east of Aurora Avenue North, between North 145th Street and North 155th Street would be considered the basin boundary between Boeing Creek (to the west) and Thornton Creek (to the east). Adjacent to the roadway along the eastern side and southern portion of the project area, stormwater runoff flows to Thornton Creek. As a result of the topography, the redevelopment of both North 152nd Street and North 145th Street (including some of the intersection area) is located within the Thornton Creek drainage basin. Aurora Avenue stormwater contributions to Thornton Creek will occur in the creek’s northwestern-most tributary. This flow to a tributary of the creek which is an intermittent-flow channel, that may be characterized as a wet, heavily vegetated swale with limited channel characteristics.”

Page 3-104 “Thornton Creek,” 3<sup>rd</sup> paragraph, 1<sup>st</sup> sentence – “The Watershed Characterization Report (Dorothy Craig and Associates, IPU, 2000) indicates that although chinook and coho salmon have been found in Thornton Creek, only minimal numbers of these fish return to spawn when compared to the numbers that returned to spawn historically.”

Page 3-104 “West Lake Washington (Densmore) Basin,” entire section – “Stormwater from a small area of the southern extent of the Aurora Corridor Project flows southeast from the project area in stormwater pipes starting near Roosevelt Way. The storm drain system runs along Roosevelt Way toward Stone Avenue. From there, the stormwater is conveyed south toward Green Lake in a storm body (over 300 acres) for stormwater contributions from the proposed project in the West Lake Washington Basin. The water level in Green Lake has been raised and is currently controlled by a constructed concrete weir along the eastern section of the lake (RCA, 2001). The weir control was designed to contain runoff within the basin to various storm event levels, but can be manually controlled to allow water to flow downstream to Ravenna Creek. Water released through the weir control enters a storm pipe and flows east to its discharge in Cowen Park and into the spring-fed Ravenna Creek.

Ravenna Creek is currently channeled within Ravenna Park, where the stream is completely contained, into a collection grate at the southern end of the park, where it is conveyed to the Ship Canal waterway. Currently, King County Metro, the City of Seattle, and Ravenna Creek Alliance have proposed to “day-light” Ravenna Creek in Cowen Park and return it to its historic channel/drainage.

King County (King County, 1997) indicates that although chinook and coho salmon were likely found in the historic Ravenna Creek, only resident cutthroat trout are identified as being found in the creek above the sewage trunk line. Rainbow trout were also observed in the creek during entomology studies (O'Neill, 1996). It is suspected that these fisheries are a remnant populations of the historic Ravenna Creek. Currently, no anadromous salmonids use Ravenna Creek.

drain system that generally parallels Aurora Avenue North. Upstream of Green Lake, the stormwater is discharged to a King County Department of Metropolitan Services storm drain that discharges to Lake Union.

Page 3-153, Table 3-50 – Alternative B – Survey of Land Uses

Business Name	Total Area (square feet)	Right-of-Way take (square feet)	% Take of Total	Land Use	Land Use Likely to Generate Hazardous Materials?
Quest Inn	23,026	0	0.0%	COM	Yes/No

Page B-7, after “Pedestrian Safety Demonstration Project”, new heading and paragraph –

### **Bus Rapid Transit Project**

King County Metro Transit is in the process of developing one arterial bus rapid transit (BRT) corridor as part of the Six Year Transit Development Plan that would be implemented between 2002 and 2007. Three candidate corridors are being considered by Metro for initial implementation, including Aurora Avenue North. The Aurora Avenue BRT service corridor would operate from downtown Seattle through north Seattle and Shoreline. The BRT service concept would include high-frequency service throughout the day, fewer stop locations, and transit priority features to increase the convenience, speed, and reliability of the service.